



Final Proposal

Broadband Equity, Access, and Deployment program

Prepared for US National Telecommunications and Information
Administration

Draft Issued for Public Comment on August 27, 2025



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Acronyms

Acronym	Definition
BABA	Build America, Buy America Act
BEAD	Broadband Equity, Access, and Deployment
BOB	Benefit of the Bargain
BSL	Broadband Serviceable Location
CAI	Community Anchor Institution
EOED	Executive Office of Economic Development
FCC	Federal Communications Commission
Gbps	Gigabits per second
IJJA	Infrastructure Investment and Jobs Act
ISP	Internet Service Provider
LEO	Low Earth Orbit
MBI	Massachusetts Broadband Institute
Mbps	Megabits per second
NOFO	Notice of Funding Opportunity
NTIA	National Telecommunications and Information Administration
PSA	Project Service Area
RPN	Restructuring Policy Notice

Overview

Massachusetts is at a pivotal moment to drive transformative change in broadband access across the Commonwealth. The Massachusetts Broadband Institute (MBI) is the central broadband office for the Commonwealth of Massachusetts. MBI is one of seven divisions of the Massachusetts Technology Collaborative (MassTech), a quasi-public economic development agency that works closely with the state Executive Office of Economic Development (EOED). MBI is partnering with EOED, the Eligible Entity on behalf of the Commonwealth, to manage the Broadband Equity, Access, and Deployment (BEAD) program.

Massachusetts has made significant investments to expand high-speed internet access across the state because of its vital role in society. MBI and EOED have funded last mile projects, established a middle mile network, and facilitated public-private partnerships to extend high-speed internet access to unserved and underserved areas. The BEAD program builds on MBI's previous initiatives and provides a unique opportunity to achieve universal access to reliable broadband service for all residents and unlock meaningful economic potential across Massachusetts.

A draft of the Final Proposal is available below, describing how Massachusetts plans to expand broadband service to eligible locations in accordance with guidance from the National Telecommunications and Information Administration (NTIA). The Final Proposal is available for public comment from August 27, 2025 - September 3, 2025. Following this period, MBI will submit its Final Proposal to NTIA and access funds to implement the initiatives described herein upon NTIA's approval.

0. Final Proposal Data Submission

0.1 Attachment (required): Complete and submit the Subgrantees CSV file (named "fp_subgrantees.csv") using the NTIA template provided.

See Exhibit A

0.2 Attachment (required): Complete and submit the Deployment Projects CSV file (named "fp_deployment_projects.csv") using the NTIA template provided.

See Exhibit B

0.3 Attachment (required): Complete and submit the Locations CSV file (named "fp_locations.csv") using the NTIA template provided.

See Exhibit C

0.4 Attachment (required): Complete and submit the No BEAD Locations CSV file (named "fp_no_BEAD_locations.csv") using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.

See Exhibit D

0.5 Question (Y/N): If the Eligible Entity intends to use BEAD funds to serve CAIs, does the Eligible Entity certify that it ensures coverage of broadband service to all unserved and underserved locations, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C §1702(h)(2)?

Yes

0.6 Exhibit E Attachment: CAIs CSV file (named "fp_cai.csv") using the NTIA template provided. Although CAIs are not included under (f)(1) development projects, to confirm the Eligible Entity's compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTOA template is required. The Eligible Entity must only include CAIs funded via BEAD in this list; the Eligible Entity may not propose funding CAIs that were not present on the approved final list from the Eligible Entity's Challenge Process results.

See Exhibit E

1. Subgrantee Selection Outcomes

1.1 Text Box: Describe how the Eligible Entity's deployment Subgrantee Selection Process undertaken is consistent with that approved by NTIA in Volume II of the Initial Proposal as modified by the BEAD Restructuring Policy Notice.

Overview

In accordance with the BEAD Restructuring Policy Notice (RPN or Policy Notice) published by the National Telecommunications and Information Administration (NTIA) on June 6, 2025, MBI updated its approach to Subgrantee Selection as initially outlined in Volume II of the BEAD Initial Proposal. MBI's changes to the program timeline, prequalification process, application expectations, and scoring criteria are described in more detail below. MBI has administered a Subgrantee Selection process that achieves NTIA's goals and objectives as embodied in the Policy Notice. The pool of provisional subgrantees are implementing a range of technologies that are providing cost-effective access to reliable, high-speed internet service for the remaining 2,596 unserved and underserved broadband serviceable locations as well as enhancing connectivity for 2,343 community anchor institutions. The average BEAD outlay cost per location is \$3,777.00

MBI has conducted outreach and awareness activities to keep stakeholders aware of the status of the BEAD program, the changes implemented through the Policy Notice, and MBI's implementation of the BEAD Benefit of the Bargain solicitation round. MBI has continuously updated the BEAD program page on the MBI website, posted updates through social media channels, sent direct email notifications to broadband providers, and held office hours to answer questions from potential applicants.

Timeline

MBI updated the program timeline set forth in Volume II of the Initial Proposal. The initial timeline included up to 3 rounds of BEAD funding for broadband deployment, with Round 1 focused on municipalities, Round 2 on remaining locations, and Round 3 on CAIs. In light of the RPN, MBI refrained from making provisional awards under Round 1 and canceled Rounds 2 and 3. MBI opened the Benefit of the Bargain (BOB) Round from July 11, 2025 to July 31, 2025, to solicit applications for BEAD funding.

Prequalification

All applicants for BEAD funding were required to provide qualification information and documentation before submitting their project applications. The requirements for qualification as outlined in Volume II of the Initial Proposal were used during the BOB Round. MBI administered a standalone prequalification process during the Fall of 2024 that resulted in the prequalification of 7 entities. During Round 1 of BEAD, two additional entities were qualified by MBI.

Any applicant that was qualified prior to the BOB Round was not required to complete qualification again for the BOB Round. However, applicants to the BOB Round that were not previously qualified were required to undergo this process. MBI published a list of applicants that were prequalified in Round 1 and therefore could directly proceed with submitting applications in its Benefit of the Bargain Solicitation.

Benefit of the Bargain (BOB) Round

As required in the RPN, MBI launched the Benefit of the Bargain Round with the objective of providing universal broadband access while minimizing costs to the BEAD program. Several application requirements in the BOB Round differed from Volume II of the Initial Proposal, including the list of eligible locations, the definition of project service areas, the elimination of many non-statutory requirements and their associated application requirements, priority broadband project evaluations, and primary and secondary scoring criteria.

Applicants that participated in Round 1 were permitted to stand on their initial applications. MBI required applicants standing on existing applications to certify that the project budget for each proposed PSA in the existing application did not include any costs to comply with BEAD program subgrantee requirements and obligations, including reporting and compliance requirements, that were eliminated by the BEAD Restructuring Policy Notice. For these applications, MBI considered the existing proposed Low-Cost Plan to be the applicant's proposed plan to satisfy the requirements for the Low-Cost Service Option. All applications were subject to the updated Priority Broadband Project and scoring criteria described in Sections 12 and 13.

Eligible Locations

MBI updated its list of eligible BEAD locations and CAI locations ahead of the BOB Round. All applicants, including those who applied in Round 1 and stood on their initial applications, were required to base proposals on this refreshed list of locations.

Project Service Areas

To comply with the RPN, MBI updated language in its Solicitation around Project Service Areas (PSAs). In the BOB Round, applicants could remove certain BSLs from the PSAs included in their proposals if the location was excessively high-cost or the costs of serving that location would make the project economically unviable. Applicants were not required to provide a narrative justification around their decision to exclude BSLs from a given PSA. Applicants could also combine multiple PSAs/municipalities into an omnibus PSA, as long as the applicant submitted a project budget for the omnibus PSA as well as project budgets for each constituent PSA/municipality.

Elimination of Certain Non-Statutory Requirements

Through the Policy Notice, NTIA eliminated many non-statutory requirements contained in the BEAD NOFO that was published on May 12, 2022. MBI modified the application submission requirements and application scoring to align with the Policy Notice. Requirements associated with areas that were removed from the BEAD BOB application process and the BEAD subgrantee form of agreement include: (1) labor, employment and workforce development; (2) climate change; (3) open access and net neutrality; (4) local coordination and stakeholder engagement; (5) middle class affordability plan; and (6) Low-Cost Service Option requirements in the Initial Proposal.

Priority Broadband Projects

MBI updated its application scoring criteria to reflect the technology-neutral approach established in the RPN. NTIA's Policy Notice states that applicants must meet the following criteria to qualify as a Priority Broadband Project:

- provide broadband service at speeds of no less than 100 Mbps for downloads and 20 Mbps for uploads;
- provide latency less than or equal to 100ms; and
- can easily scale speeds over time to meet the evolving connectivity needs of households and businesses;
- support the deployment of 5G, successor wireless technologies, and other advanced services.

For purposes of this Priority Broadband Project status review, MBI required applicants to submit a narrative with clear and convincing, objective evidence demonstrating that the proposed technology meets technical requirements outlined below. All applicants were required to demonstrate that their proposed projects met standards for speed, latency, scalability, ability to support advanced technologies, and ability to serve every unserved and underserved location within 10 business days upon request within the proposed PSA (collectively, the "Priority Broadband Project Technical Requirements"). MBI provided applicants with two technical narrative options to demonstrate that the proposed projects meet these requirements.

Additional details about the application requirements for applicants seeking Priority Broadband Project status and the process for evaluating and making Priority Broadband determinations are provided in Section 12 of this Final Proposal.

Application Review and Scoring

Following the close of the BOB Round, MBI evaluated proposals against updated criteria to comply with the RPN.

Evaluation Process

MBI formed an Evaluation Committee comprised of three MBI/MassTech employees familiar with the BOB Round Solicitation. The committee conducted a threshold review of each application for completeness, and compliance with solicitation requirements, rejected materially non-compliant applications, and evaluated and scored each application in alignment with NTIA BEAD requirements. MBI issued clarification and/or curing questions to applicants, where necessary and appropriate, to ensure that each application was evaluated in accordance with BEAD program requirements. MBI provided applicants with the opportunity to cure areas where an application did not comply with solicitation requirements. MBI also sent clarification questions that addressed issues that included applicant qualifications, alignment of project budget amounts, broadband serviceable location counts, network design details, and the technical capabilities of a proposed network to meet the requirements for priority broadband project status. All applications that passed threshold review, including those submitted by applicants who participated in Round 1 and chose to stand on their Round 1 applications, were scored by MBI according to the updated scoring criteria below.

When MBI determined that an application submitted for a Priority Broadband Project did not have sufficient information to determine whether the proposed project meets the requirements in this Solicitation for a Priority Broadband Project, MBI designated the proposed project as a Non-Priority Broadband Project and such project was evaluated and scored accordingly.

MBI prioritized Priority Broadband Projects over Non-Priority Broadband Projects. However, when MBI determined that selecting a Priority Broadband Project would incur excessive costs and there were no other Priority Broadband Project applications for a particular Project Service Area, MBI selected a lower cost Non-Priority Broadband Project. MBI rejected any proposed PSA where the associated costs were determined by MBI to be excessive.

Scoring Criteria

MBI updated its scoring rubric from Volume II of the Initial Proposal to reflect changes in the RPN. MBI utilized the criteria to analyze competing Priority Broadband Project applications, as well as competing Non-Priority Broadband Project applications if no such priority project was submitted for consideration for that respective PSA.

Primary Criteria: In deciding among competing applications covering the same PSA, MBI selected the option with the lowest cost based on minimal BEAD program outlay.

Minimal BEAD Program Outlay: MBI selected the combination of project applications with the lowest overall cost to the BEAD program. When appropriate, this involved selecting an application that was not the lowest-cost option for a given

set of BSLs but was part of the combination of selected projects with the lowest overall cost to the BEAD program. When comparing competing proposals, MBI assessed the total BEAD funding that will be required to complete the project (i.e., the total project cost minus the applicant's proposed match) and the cost to the BEAD program per location (i.e., the total BEAD funding that will be required to complete the project divided by the number of BSLs the project will serve).

Secondary Criteria: If an application to serve the same PSA proposed a project cost that was within 15% of the lowest cost application received for the same PSA on a per location basis, MBI evaluated such applications based on the following Secondary Criteria. There were 100 total points available through Secondary Criteria scoring, and the project with the highest Secondary Criteria point total was selected. Priority Broadband Project applications competed against other Priority Broadband Project applications. If no Priority Broadband Projects were awarded for a PSA, Non-Priority Broadband Project applications competed against other Non-Priority Broadband Project applications.

Table 1

<u>Secondary Criteria</u>	<u>Total Possible Points</u>
<i>Speed of Network and Other Technical Capabilities.</i> MBI weighed the speed, latency, and other technical capabilities of the technologies proposed by prospective subgrantees.	40 Points
<i>Preliminary/Provisional Subgrantees.</i> For locations where MBI has already identified preliminary subgrantees, MBI gave additional weight to those applications in the Benefit of the Bargain Round.	60 Points

Points for Speed of Network and Other Technical Capabilities were allocated on the following scale with corresponding point totals:

Table 2

<u>Secondary Criteria – Speed of Network Scoring</u>			
Download Speeds		Upload Speeds	
100 Mbps	0 Points	20 Mbps	0 Points
Greater than 100 Mbps but less than or equal to 250 Mbps	5 Points	Greater than 100 Mbps but less than or equal to 250 Mbps	2 Points
Greater than 250 Mbps but less than or equal to 500 Mbps	10 Points	Greater than 250 Mbps but less than or equal to 500 Mbps	5 Points
Greater than 500 Mbps but less than or equal to 1 Gbps	15 Points	Greater than 500 Mbps but less than or equal to 1 Gbps	7.5 Points
Greater than 1 Gbps	20 Points	Greater than 1 Gbps	10 Points

Table 3

<i>Secondary Criteria – Latency Scoring (as measured from the customer premises of an active subscriber to a remote test server at an end-point consistent with the requirements for a FCC-designated Internet Exchange Point)</i>	
Latency	Points
100 ms	0 Points
Greater than or equal to 50 ms but less than 100ms	2.5 Points
Greater than or equal to 25 ms but less than 50 ms	5 Points
Less than 25 ms	10 Points

Table 4

Secondary Criteria – Preliminary Subgrantees	
BEAD Status	Points
MBI has identified the applicant as a Preliminary Subgrantee in the same general project area based on the applicant's submission in response to MBI's Round 1 BEAD program Solicitation No.2025-MBI-06	60 Points

Subgrantee Awards

1.2 Text Box: Describe the steps that the Eligible Entity took to ensure a fair, open, and competitive process, including processes in place to ensure training, qualifications, and objectiveness of reviewers.

MBI has taken great care to ensure that its subgrantee selection process was fair, open, competitive, and transparent. MBI utilized its capabilities and structures developed for previous state and federal programs including the Gap Networks program to inform the BEAD deployment subgrantee selection process.

This approach ensured the selection process for deployment activities was conducted in a fair manner, as safeguards were also in place to prevent collusion, bias, conflicts of interest, and arbitrary decisions. Safeguards in place included:

- Requiring Evaluation Committee members to disclose any real or perceived conflicts of interest. MBI reserved the right to remove any Evaluation Committee members if conflicts of interest were identified.
- Requiring applicants to certify that answers, statements, and information contained in their application were to the best of their knowledge complete, true, and correct.
- Prohibiting direct collusion between applicants to coordinate bidding and other anti-competitive behavior. Applicants were required to self-certify in their application materials that bids were developed independently and without coordination or collusion with other prospective applicants. Evidence of collusion would lead to denial of awards.
- Developing evaluation criteria that were competitively neutral and unbiased to ensure there was no preference for any specific type of applicants. See Section 13 for more detailed scoring criteria.

- Maintaining transparency measures implemented throughout the process design, which included providing an objective scoring process based on quantitative measures that were published in publicly available procurement documents, and alignment with state and federal laws and guidance, such as the BEAD NOFO. MBI documented the scoring and evaluation process, and the resulting documentation will be retained.
- Ongoing and frequent communications with written materials and two live Q&A events to enable maximum information sharing with potential applicants. MBI conducted outreach to a wide variety of fiber providers to encourage their participation in the BOB Round and answered application questions in these sessions.

Solicitation Process:

In addition to the above, MBI's process for awarding funds to subgrantees for broadband deployment programs included the following safeguards to ensure fairness, transparency, due process, and compliance with federal and state requirements:

1. The approved solicitation contains objective standards for awarding funds that apply to all applicants
2. The approved solicitation includes an explanation of the scoring criteria that apply to all applicants
3. The approved solicitation includes a detailed timeline that applies to all applicants
4. The approved solicitation contains requirements for applicants to demonstrate financial capacity to conduct the funded activities
5. The approved solicitation contains requirements for applicants to demonstrate managerial and organizational capacity to conduct the funded activities
6. The approved solicitation contains requirements for applicants to demonstrate technical capacity to conduct the funded activities and provided two narrative options for applicants seeking Priority Broadband Project status to ensure that all providers were offered a fair opportunity to achieve Priority Broadband status regardless of the technology that would be deployed with BEAD funding.
7. The approved solicitation includes an agreement template that all applicants must sign prior to receiving funds.
8. The agreement template contains reporting requirements, payment milestones, and detailed obligations arising from federal and state requirements

9. MBI posted the solicitation on the MBI website and on COMMBUYS (the Commonwealth of MA's procurement website)
10. Prior to the application deadline, MBI conducted a webinar for potential applicants. Upon receipt of applications, MBI conducted a threshold review to include an evaluation that each applicant has not been debarred on the state or federal level
11. MBI formed an Evaluation Committee including three MBI/MassTech employees familiar with the solicitation
12. The Evaluation Committee reviewed each application for completeness and rejected materially non-compliant applications
13. The Evaluation Committee used the evaluation criteria contained within the approved solicitation to evaluate and score each applicant that submitted a compliant application
14. Based on the scoring, the Evaluation Committee recommended that the highest scoring applicant(s) receive funding
15. The resulting funding agreement contains detailed reporting and compliance requirements for fund disbursement, and monitoring by MBI will continue throughout the funding agreement period of performance

1.3 Text Box: Affirm that, when no application was initially received, the Eligible Entity followed a procedure consistent with the process approved in the Initial Proposal.

In Volume II of the Initial Proposal, MBI proposed a plan to engage in individual conversations with providers operating in or adjacent to municipalities with unserved or underserved BSLs remaining after initial rounds of BEAD funding. Since all BSLs received qualifying bids in the BOB Round, MBI did not need to conduct further outreach to providers to serve these areas.

1.4 Text Box (If applicable): Describe the Eligible Entity's methodology for revising its eligible CAI list to conform with Section 4 of the BEAD Restructuring Policy Notice.

MBI updated its CAI list prior to opening the Benefit of the Bargain Round based on guidance in the BEAD Restructuring Policy Notice. Section 4 of the RPN narrowed the definition of a Community Anchor Institution to that established by IIJA. Accordingly, MBI applied the updated definition of a CAI, resulting in a reduced number of Community Anchor Institutions in the BOB Round. After the BEAD Benefit of the Bargain solicitation round closed, NTIA provided a list of 301 CAIs that NTIA determined did not meet the updated criteria to qualify as a community support organization as defined in Version 12 of the BEAD Program Frequently Asked

Questions posted by NTIA. MBI removed those CAIs from eligibility for BEAD funding during the process of evaluating and scoring applications.

1.5 Question (Y/N): Certify whether the Eligible Entity will retain all subgrantee records in accordance with 2 C.F.R. § 200.334 at all times, including retaining subgrantee records for a period of at least 3 years from the date of submission of the subgrant's final expenditure report. This should include all subgrantee network designs, diagrams, project costs, build-out timelines and milestones for project implementation, and capital investment schedules submitted as a part of the application process.

Yes.

3. Timeline for Implementation

3.1 Text Box: Has the Eligible Entity taken measures to (a) ensure that subgrantees will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant, (b) ensure all BEAD subgrant activities are completed at least 120 days prior to the end of the Eligible Entity's period of performance, in accordance with 2 C.F.R 200.344; and (c) ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by the end of the period of performance for its award, in accordance with 2 C.F.R 200.344?

MBI affirms that it has taken measures to ensure that subgrantees will begin providing service to customers who desire it within the project area no later than four years after the date on which the subgrantee receives the subgrant. In the BEAD Grant Agreement, MBI defines the period of performance as four years. In the Solicitation, MBI required applicants to certify that their proposed network designs would be capable of delivering service that meets speed, latency, and scalability requirements in this timeframe.

MBI certifies that it will ensure all BEAD subgrant activities are complete at least 120 days prior to the end of the period of performance and that MBI will complete programmatic activities by the end of its period of performance. During the Benefit of the Bargain Round, applicants were required to submit proposed project schedules. In its application review process, MBI evaluated these project schedules to ensure subgrantee activities would be completed at least 120 days prior to the end of the period of performance to allow for time for MBI to conclude all programmatic activities. For each of the milestones in the table below, applicants provided proposed start and end dates:

Table 5

Phase	Milestone
Pre-Engineering	Site surveys, field work, and completion of preliminary design and engineering

Final Engineering	Execution of cable television license agreement (if applicable)
Regulatory Approvals and/or Permits	• Filing make-ready applications for pole and conduit licenses and payment of associated fees • Payment of make-ready estimates to utilities • Receipt of all make-ready licenses needed to complete the Project • Receipt of municipal grants of location to public rights of way (if applicable) • Compliance with National Environmental Policy Act (NEPA) and Environmental and Historic Preservation (EHP) requirements
Construction	Completion of 50% of construction buildout (measured by premises passed)
Testing and Project Closeout	Final Completion (measured by 100% of premises passed and completion of initial customer installations)

MBI recognized that applications from LEO satellite providers may have different milestones than traditional ISP projects. LEO satellite applicants were provided with the flexibility to submit a milestone project schedule in table format that includes proposed phases and milestones and associated start and end dates for each proposed PSA.

To ensure compliance with the proposed milestones, MBI will require periodic subgrantee reporting, desk reviews, and field visits as outlined in the Monitoring Plan. Additionally, MassTech will make payments to subgrantees upon completion of specified project milestones. BEAD subgrantees will receive funding on a fixed amount subaward basis based on pre-determined and agreed invoice submission. The fixed amount subawards provide for a maximum payment amount based on a reasonable estimate of actual eligible project costs. Payments to subrecipients will be based on actual project costs supported by documentation of project expenses as further detailed in the Funding Agreement. Each payment request will also be accompanied by a report, the format of which will be provided by MBI, on the project's progress, expenditures, risks and impact.

4. Oversight and Accountability Processes

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

Yes. The Commonwealth of Massachusetts has a 24-hour confidential fraud hotline through the Office of the Inspector General. Reports can be made via phone (800-322-1323), email (IGO-FightFraud@mass.gov), or online form (<https://www.mass.gov/forms/report-fraud-waste-or-abuse-of-government-funds-or-property-to-the-oig-online-form>).

4.2 Attachments: Upload the following two required documents:

(1) BEAD program monitoring plan;

Attached as BEAD Monitoring Plan.

(2) Agency policy documentation which includes the following practices: a. distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds in the subgrantee fails to take the actions the funds are meant to subsidize) or on a basis determined by the terms and conditions of a fixed amount subaward agreement; and b. timely subgrantee (to Eligible Entity) reporting mandates.

Attached as BEAD Subgrant Agreement.

4.3 Question (Y/N): Certify that the subgrant agreements will include, at a minimum, the following conditions:

a. Compliance with all relevant obligations in the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, if applicable, including regular reporting and updates to track the effectiveness of the use of funds provided;

b. Compliance with the obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;

c. Compliance with all relevant obligations in Eligible Entity's approved Initial and Final Proposals, including these BEAD General Terms and Conditions and the specific Award Conditions incorporated into that Eligible Entity's BEAD award;

d. Subgrantees, at a minimum, must include their obligations on a reimbursable basis for a maximum of all deployment projects on funding to subgrantees;

e. Subgrantee accountability practices that include the use of clawback provisions between the Eligible Entity and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);

f. Mandate for subgrantees to publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) and/or subgrantee internal ethics office (or comparable entity) for any purpose related to misuse or fraud or abuse of program funds. This includes an acknowledgment of this requirement by each

subgrantee accountable for passing such information down to related program Officer; and

g. The use of effective oversight, such as subgrantee accountability measures based on performance against budget performance; financial management; compliance; program performance is measured accurately over time so that subgrantee performance is consistently assessed and tracked over time.

Yes.

5. Local Coordination

5.1 Text Box: Describe the public comment period and provide a high-level summary of the comments received by the Eligible Entity during the public comment period, including how the Eligible Entity addressed the comments.

As required by NTIA, MBI conducted a 7-day public comment period, from August 27, 2025, to September 3, 2025. MBI made the Final Proposal available for public comment through posting on their website with a feedback form to solicit responses. Additionally, MBI sent out multiple communications to stakeholders to raise awareness and promote the opportunity to submit a public comment.

MBI received a broad range of feedback from internet service providers (“ISPs”), local and tribal governments advocacy organizations, and individuals. While some comments expressed support for the outcomes of the subgrantee selection process, others expressed high-level concerns about the mix of technologies that would be deployed by provisional subgrantees. There were also localized feedback regarding the accuracy or treatment of certain locations. Other points raised by commenters include:

- Suggestions for revisions to the BEAD Grant Agreement terms and conditions;
- Concerns that the format of the Final Proposal and associated data files should be presented in a manner that would be easier for members of the public to review;
- Concerns that the Benefit of the Bargain subgrantee selection process and scoring rubrics, including the Minimal BEAD Program Outlay, did not take into consideration other factors of importance to stakeholders, including a federally recognized tribal nation; and
- Support for NTIA to make available to Massachusetts the remaining BEAD allocation for the state, which exceeds \$125 million, to support complimentary investments that would enhance and expand the statewide value and benefit of the proposed deployment projects.

EOED and MBI appreciate the time and effort of the organizations and individuals that read the Draft Final Proposal and submitted comments. The level of stakeholder interest

and engagement reflects the vital importance of access to reliable broadband service for residents and businesses. The diversity of feedback received during the public comment period is indicative of the broad range of stakeholder interests and perspectives. EOED and MBI will continue to consider feedback that does not impact the submission of the BEAD Final Proposal to NTIA on September 4, 2025. However, EOED and MBI have determined that is necessary and appropriate to move forward and seek NTIA approval of the Massachusetts BEAD Final Proposal, which complies with federal statutory requirements and the NTIA's programmatic and policy documents, including the BEAD Restructuring Policy Notice issued by NTIA on June 6, 2025.

6. Challenge Process Results

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

Yes.

6.2 Text Box: Provide a link to the website where the Eligible Entity has publicly posted the final location classifications (unserved/underserved/CAIs) and note the date that it was publicly posted.

MBI posted final location classifications on December 20, 2024. The Post Challenge BSL List, the Post Challenge CAI List and the lists with disposition of all submitted BSL and CAI challenges is available on the BEAD program webpage on the MBI website at the following link: <https://broadband.masstech.org/bead-program>.

7. Unserved and Underserved Locations

7.1 Question (Y/N): Certify whether the Eligible Entity will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2)(X).

Yes.

7.2 Text Box: If the Eligible Entity does not serve an unserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.

Not Applicable.

7.3 Attachment (Optional): If applicable to support the Eligible Entity's response to Question 7.2, provide relevant files supporting the Eligible Entity's determination.

Not Applicable.

7.4 Question (Y/N): Certify whether the Eligible Entity will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2)(X).

Yes.

7.5 Text Box: If the Eligible Entity does not serve an underserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.

Not Applicable.

7.6 Attachment (Optional): If applicable to support the Eligible Entity's response to Question 7.5, provide relevant files supporting the Eligible Entity's determination.

Not Applicable.

7.7 Question (Y/N): Certify whether the Eligible Entity has utilized the provided reason codes to investigate and account for locations that do not require BEAD funding, that the Eligible Entity will use reason codes 1, 2, and 3 for the entire period of performance, and that the Eligible Entity will maintain documentation, following the guidelines provided by NTIA, to justify its determination if there is a reason to not serve any unserved or underserved location on the NTIA-approved final list of eligible locations through a BEAD project. The documentation for each location must be relevant for the specific reasons indicated by the Eligible Entity in the *fp_no_BEAD_locations.csv* file. The Eligible Entity shall provide the documentation for any such location for NTIA review, as requested during Final Proposal review or after the Final Proposal has been approved.

Yes.

7.8 Question (Y/N): Certify that the Eligible Entity has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that the Eligible Entity was notified of and did not object to, and/or federally-funded awards for which the Eligible Entity has discretion over where they are spent (e.g., regional commission funding or Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects.

Yes.

11. Implementation Status of Plans for Cost and Barrier Reduction, Compliance with Labor Laws, Low-Cost Plans, and Network Reliability and Resilience

11.1 Text Box: Provide the implementation status (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment.

In Volume II of its Initial Proposal, MBI outlined 3 initiatives to reduce costs and barriers to deployment: promoting the use of existing infrastructure, promoting policies that facilitate access to critical enabling infrastructure, and promoting an efficient make-ready process.

To promote the use of existing infrastructure, MBI proposed exploring the development of infrastructure asset maps in its Initial Proposal. This specific initiative has not been started.

MBI's initiatives related to promoting policies to facilitate access to enabling infrastructure and promoting an efficient make-ready process are in progress. MBI is convening a Make-Ready Working Group in coordination with EOED and the Department of Telecommunications and Cable (DTC) with utility pole owners and providers awarded grants under MBI's Gap Networks Grant program, which is funded through the American Rescue Plan Act Capital Projects Fund. These monthly meetings provide a forum to track every phase of the make-ready process to obtain licenses for aerial attachments to utility poles and troubleshoot issues that may be impeding progress. The Make-Ready Working Group was initially created as part of the Last Mile broadband infrastructure grant programs launched in 2016 with state bond funds. MBI, EOED and DTC intend to use the Make-Ready Working Group to support BEAD-funded projects.

The Department of Telecommunications and Cable (DTC) and the Department of Public Utilities (DPU) jointly issued order D.P.U. 25-10/D.T.C. 25-1 in January 2025 to open an inquiry exploring utility pole attachment, conduit access, double poles and related issues applicable to utility work conducted in Massachusetts public rights-of-way. The process of accessing utility poles and conduits, and the performance of make-ready work are critical elements for broadband infrastructure projects expanding access to high-speed internet service for residents and businesses across the state. Massachusetts does not currently mandate one touch make-ready. The public was encouraged to submit

comments on this inquiry by March 18. DTC and DPU promulgated draft regulations, which were posted for public comment. The public comment period closed on August 8, 2025, and DTC and DPU are currently reviewing the comments.

11.2 Question (Y/N): Affirm that the Eligible Entity required subgrantees to certify compliance with existing federal labor and employment laws.

Yes.

11.3 Text Box (Optional – Conditional on a ‘No’ Response to Intake Question 11.2): If the Eligible Entity does not affirm that subgrantees were required to certify compliance with federal labor and employment laws, explain why the Eligible Entity was unable to do so.

Not Applicable.

11.4 Question (Y/N): Certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.

Yes.

11.5 Text Box (Optional – Conditional on a ‘No’ Response to Intake Question 11.4): If the Eligible Entity does not certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period, explain why the Eligible Entity was unable to do so.

Not Applicable.

11.6 Question (Y/N): Certify that all subgrantees have planned for the reliability and resilience of BEAD-funded networks.

Yes.

11.7 Text Box (Optional – Conditional on a ‘No’ Response to Intake Question 11.6): If the Eligible Entity does not certify that subgrantees have planned for the reliability and resilience of BEAD-funded networks in their network designs, explain why the Eligible Entity was unable to do so.

Not Applicable.

12. Substantiation of Priority Broadband Projects

12.1 Text Box: Describe how the Eligible Entity applied the definition of Priority Project as defined in the Infrastructure Act and the BEAD Restructuring Policy Notice.

MBI updated its definition of Priority Broadband Projects in accordance with the BEAD Restructuring Policy Notice and adopted a technology-neutral approach at the project service area level to determine whether an application merited “Priority Broadband Project” status consistent with directives outlined in the Infrastructure Investment and Jobs Act and the BEAD Restructuring Policy Notice.

The methodology applied a two-part test aligned with the statutory definition of priority broadband project:

- 100/20 Mbps with less than 100 ms of latency by the end of the Period of Performance; *and*
- Demonstration of scalability to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies and other advanced services.

100/20 speed and 100 ms latency thresholds were clearly established in statute and were a required commitment in all subgrantee applications. For scalability, MBI adopted an approach requiring subgrantee applicants to submit a technical narrative demonstrating by “clear and convincing” evidence their project proposals could meet these additional statutory requirements. MBI provided applicants with the following two technical narrative options:

Option 1: Applicants choosing Option 1 were required to submit a narrative demonstrating that the proposed technology has the capability to meet the future end-user speed threshold of 1,000 Mbps download and 500 Mbps upload by the end of the period of performance (approximately 4 years from date of award) and the future latency threshold to support emerging real-time applications and high-precision applications, to include AR, AI, and IOT applications. Further, applicants had to demonstrate that this level of service would be accessible to all BSLs in which service is proposed in each PSA.

Furthermore, applicant narratives were required to include the following information in support of the technology capability of the proposed approach to satisfy the criteria of a Priority Broadband Project for each proposed PSA (where the information and/or documentation was the same for multiple or all proposed PSAs the applicant were able to indicate such in the application):

1. A network design narrative for the proposed broadband delivery technology clearly demonstrating hardware, software, and backhaul infrastructure considerations for the proposed and/or existing network. Applicants were required to include plans for future increased backhaul and bandwidth capacity growth over the next 4 years to account for increased per-user throughput.
2. Network technology design that provide clear and convincing evidence of the proposed technology's technical capability to reliably deliver within the next four year a minimum of 1 Gbps bps download and 500 Mbps upload end user speeds with latency levels that do not exceed 50ms. Broadband service that meets these standards shall be or become available within the 4 years following award without any technology availability contingencies. The applicant could opt to include, but not solely rely upon, third party evidence such as vendor studies, third-party field studies, and/or other technical documentation highlighted in relevant parts to substantiate speed and latency claims made in a project proposal.
3. Certification with supporting evidence that the applicant has the financial capacity to support network maintenance, growth and capacity expansion over the next 4 years to manage additional users and substantially increased throughput on the proposed network.

Independent, third-party research further underscores that bandwidth demand growth will quickly make sub-gigabit service inadequate for many households and businesses. The 2023 IEEE Communications Surveys & Tutorials study on “Broadband Network Requirements for the 2030s” concludes that next-generation applications—including AR/VR, holographic conferencing, and industrial IoT—will necessitate symmetric throughput in the 1 Gbps range and <50 ms end-to-end latency to ensure seamless user experience and operational reliability.

The continued evolution of mobile wireless further drives demand for robust, fixed network connectivity. According to the International Telecommunication Union (ITU) Recommendation ITU-R M.2516 (2023), the backhaul and fronthaul demands of 5G Advanced and early 6G deployments will require fixed access networks in served areas to sustain multi-gigabit symmetric rates to support dense small-cell architectures, edge computing, and massive machine-type communications. Networks built to a 1,000/500 Mbps, ≤50 ms standard inherently provide the scalable, low-latency fabric needed for these advanced wireless services, ensuring that communities served by Priority Broadband Projects remain competitive as both fixed and mobile connectivity demands continue their substantial growth trajectory.

Option 2: In effort to ensure technology neutrality and equal consideration of all access technology platforms, MBI also offered applicants another pathway for priority

broadband consideration. Applicants who did not want to use the speed/latency threshold in Option 1 were provided the option to submit a Scalability and Advanced Services Narrative. This narrative required supporting technical documentation from third party sources that would demonstrate through clear and convincing evidence that the proposed technology has the capability to meet the speed and scalability requirements in the statutory priority broadband project definition. Minimum requirements for this narrative included each of the following per project service area:

1. A network design narrative clearly demonstrating hardware, software, and backhaul capacity for the proposed broadband network, and backhaul capacity considerations for any supporting or existing network.
2. Clear and convincing evidence, which may include third party evidence such as vendor studies, third-party field studies, and/or other technical documentation highlighting the relevant parts to substantiate the network's technical ability to reliably deliver speed and latency as designed.
3. A description of how the proposed network can provide broadband service at speeds of no less than 100 Mbps for downloads and 20 Mbps for uploads, has a latency below or equal to 100 ms.
4. A description of how the proposed network can easily scale over time to meet the evolving connectivity needs of households and businesses.
5. A description of how the proposed project can scale to support the deployment of 5G, successor wireless technologies, and other advanced services.
6. A description of how the network capacity will be monitored, including upgrade triggers, such as utilization thresholds or service adoption rates, that will prevent capacity constraints from impacting service quality.
7. Information defining the proposed network's point-to-point backhaul, describing current backhaul capacity, commitments for increased backhaul capacity to account for scaling, and the technology to be utilized for future backhaul needs.

Plans for deployment and scalability were required to avoid speculation about emerging methods and prospective capabilities. Option 2 was designed to preserve full technology neutrality and ensure that applicants using diverse and potentially lower cost access platforms had an equitable pathway to Priority Broadband Project status if they chose not to benchmark their proposal against the 1,000/500 Mbps, ≤50 ms standard in Option 1.

By allowing applicants to submit a Scalability and Advanced Services Narrative, MBI ensured that providers using technologies with credible upgrade paths—but which may not currently be able to certify to the Option 1 speed/latency target—could still demonstrate compliance with the IIJA's Priority Broadband Project definition through "clear and convincing" technical evidence. This approach recognized that some

networks could potentially achieve statutory scalability through different architectures or phased deployments, particularly where innovation in spectrum management, capacity prioritization, backhaul upgrades, or hybrid fiber-wireless integration may enable future capacity growth. As such, this option afforded every opportunity for applicants to make their case for achieving statutory scalability.

Further, this pathway was also critical to achieve the overarching BEAD goal of internet access for every BSL. Communities proposed to be served by non-fiber platforms were not excluded or disadvantaged solely because of their service network design, market positioning, or lack of adjacent gigabit infrastructure. At the same time, Option 2 maintained a rigorous standard by requiring detailed engineering narratives, third-party documentation, vendor or field studies, backhaul capacity commitments, and clearly defined upgrade triggers to prevent future congestion. By focusing on documented scalability, support for advanced services, and robust upgrade planning, Option 2 allowed MBI to evaluate the long-term viability of diverse network designs on their own merits.

By establishing two distinct options for applicants to demonstrate their eligibility for Priority Broadband Project status, MBI effectively incorporated NTIA's policy objectives of technology neutrality, cost efficiency, and program accountability into the priority designation process. This structure ensured that applicants employing any qualified access technology could receive equitable consideration, including those proposing lower-cost approaches that could preserve BEAD funds for broader coverage. At the same time, this process safeguarded public investment by requiring that all claims be supported by clear and convincing, verifiable, and performance-based evidence rather than overly generalized or speculative assertions.

13. Subgrantee Selection Certification

13.1 Text Box: Provide a narrative summary of how the Eligible Entity applied the BEAD Restructuring Policy Notice's scoring criteria to each competitive project application and describe the weight assigned to each Secondary Criteria by the Eligible Entity. Scoring criteria must be applied consistent with the prioritization framework laid out in Section 3.4 of the BEAD Restructuring Policy Notice.

MBI updated its scoring criteria during the Benefit of the Bargain Round to reflect changes outlined in NTIA's Restructuring Policy Notice. MBI utilized the criteria to

analyze competing Priority Broadband Project applications, as well as competing Non-Priority Broadband Project applications if no such Priority Project was submitted for consideration for that respective PSA.

Primary Criteria: In deciding among competing applications covering the same PSA, MBI selected the option with the lowest cost based on minimal BEAD program outlay.

Minimal BEAD Program Outlay: MBI selected the combination of project applications with the lowest overall cost to the BEAD program. When appropriate, this involved selecting an application that was not the lowest-cost option for a given set of BSLs but was part of the combination of selected projects with the lowest overall cost to the BEAD program. When comparing competing proposals, MBI assessed the total BEAD funding that will be required to complete the project (i.e., the total project cost minus the applicant's proposed match) and the cost to the BEAD program per location (i.e., the total BEAD funding that will be required to complete the project divided by the number of BSLs the project will serve).

Secondary Criteria: If an application to serve the same PSA proposed a project cost that was within 15% of the lowest cost application received for the same PSA on a per location basis, MBI evaluated such applications based on the following Secondary Criteria. There were 100 total points available through Secondary Criteria scoring, and the project with the highest Secondary Criteria point total was selected. Priority Broadband Project applications competed against other Priority Broadband Project applications. If no Priority Broadband Projects were awarded for a PSA, Non-Priority Broadband Project applications competed against other Non-Priority Broadband Project applications.

Table 6

<u>Secondary Criteria</u>	<u>Total Possible Points</u>
<i>Speed of Network and Other Technical Capabilities.</i> MBI weighed the speed, latency, and other technical capabilities of the technologies proposed by prospective subgrantees.	40 Points
<i>Preliminary/Provisional Subgrantees.</i> For locations where MBI has already identified preliminary subgrantees, MBI gave additional weight to those applications in the Benefit of the Bargain Round.	60 Points

Points for Speed of Network and Other Technical Capabilities were allocated on the following scale with corresponding point totals:

Table 7

<u>Secondary Criteria – Speed of Network Scoring</u>			
Download Speeds		Upload Speeds	
100 Mbps	0 Points	20 Mbps	0 Points
Greater than 100 Mbps but less than or equal to 250 Mbps	5 Points	Greater than 100 Mbps but less than or equal to 250 Mbps	2 Points
Greater than 250 Mbps but less than or equal to 500 Mbps	10 Points	Greater than 250 Mbps but less than or equal to 500 Mbps	5 Points
Greater than 500 Mbps but less than or equal to 1 Gbps	15 Points	Greater than 500 Mbps but less than or equal to 1 Gbps	7.5 Points
Greater than 1 Gbps	20 Points	Greater than 1 Gbps	10 Points

Table 8

<i>Secondary Criteria – Latency Scoring (as measured from the customer premises of an active subscriber to a remote test server at an end-point consistent with the requirements for a FCC-designated Internet Exchange Point)</i>	
Latency	Points
100 ms	0 Points
Greater than or equal to 50 ms but less than 100ms	2.5 Points
Greater than or equal to 25 ms but less than 50 ms	5 Points
Less than 25 ms	10 Points

Table 9

<i>Secondary Criteria – Preliminary Subgrantees</i>
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BEAD Status	Points
MBI has identified the applicant as a Preliminary Subgrantee in the same general project area based on the applicant's submission in response to MBI's Round 1 BEAD program Solicitation No.2025-MBI-06	60 Points

14. Environmental and Historic Preservation (EHP) Documentation

14.1 Attachment (Required): Submit a document which includes the following:

- Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's National Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESPATT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.
- Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.
- Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant chapter of the FirstNet Regional programmatic Environmental Impact Statement (PEIS)
- Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet PEIS.
- Description of the EE's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds which projects await EHP clearances.

See attached Environmental and Historic Preservation Documentation.

15. Consent from Tribal Entities

15.1 Attachment (required if any deployment project is on Tribal Lands): Upload a Resolution of Consent from each Tribal Government (in PDF Format) from which consent was obtained to deploy broadband on its Tribal Land. The Resolution(s) of Consent submitted by the Eligible Entity should include appropriate signatories and relevant context on the planned (f)(1) broadband deployment including the timeframe of the agreement. The Eligible Entity must include the name of the Resolution of Consent PDF in the Deployment Projects CSV file.

Not Applicable.

16. Prohibition on Excluding Provider Types

16.1 (Y/N): Does the Eligible Entity certify that it did not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for a BEAD subgrant, consistent with the requirement at 47 U.S.C §1702(h)(1)(A)(iii)?

Yes.

17. Waivers

17.1 Text Box: If any waivers are in process and/or approved as part of the BEAD Initial Proposal or at any point prior to the submission of the Final Proposal, list the applicable requirement(s) addressed by the waiver(s) and date(s) of submission. Changes to conform to the BEAD Restructuring Policy Notice should be excluded. If not applicable to the EE, note "Not Applicable."

Not Applicable.

17.2 Attachment (optional): If not already submitted to NTIA, and the Eligible Entity needs to request a waiver for a BEAD program requirement, upload a completed Waiver Request Form here. If documentation is already in process or has been approved by NTIA, the EE does NOT have to upload waiver documentation again.

Not Applicable.

Exhibits

Exhibit A - Subgrantee CSV file

Exhibit B - Deployment Projects CSV file

Exhibit C - Locations CSV file

Exhibit D - No BEAD Locations CSV file

Exhibit E - CAIs CSV file

Exhibit F - BEAD Program Monitoring Plan

Exhibit G - Draft Subgrant Agreement and LEO

Exhibit H - Environmental and Historic Preservation (EHP) Documentation