

BEAD PROGRAM APPLICATION

Frequently Asked Questions

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IDAHO DEPARTMENT OF COMMERCE

OFFICE OF BROADBAND



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FAQ Document Overview

The Idaho Office of Broadband (IOB) will post an updated Frequently Asked Questions (FAQs) document daily during the application period. The cover will include the date the document is posted to the Link Up Idaho website. The document sections include the application categories and other subjects critical to the Broadband, Equity, Access, and Deployment (BEAD) Program. The new questions will appear at the top of each section and will be noted as NEW or UPDATED.

If you have questions about the BEAD Program that are not currently addressed in the FAQs, you may email IdahoBEAD@mbakerintl.com. Both the question and answer will be added to the next iteration of the FAQs. However, please note that **the IOB cannot respond to questions that relate to an applicant's application strategy, approach to answering application questions, application preparation, or subjects outside the scope of the application.**

General

Topics Include: Excessive Cost, Round 2 Eligibility, Round 1 Applications, CAI Service, Subgrantee Agreement, Deconfliction, Application Deadline, IBAB Meeting, Reimbursements, Priority Projects, Penalties

1. To facilitate more bids, has the IOB reduced any of the application requirements, including questions and required templates or documentation, for Round 2?

- No, the application requirements and associated templates are the same as required in Round 1. While the IOB understands the compressed nature of the application window, all applicants are required to complete the full application for Round 2. There will be no curing, so please ensure that you correctly complete all templates, including the Round Two: Application Project Area and BSL Template, Proforma Template, Fixed Wireless Performance Template (if applicable), Network Route Diagram, and Logical Network Drawing. The templates can be found on the Subgrantee Selection Process page of the Link Up Idaho website at <https://linkup.idaho.gov/beadsubgrantee/>. Please note that applicants are required to use the Round Two: Application Project Area and BSL Template.

2. What is Idaho's excessive cost per BSL?

- The IOB is still calculating and analyzing the excessive cost figure. The Round 2 data will also impact this, so the IOB does not anticipate having this figure until the Final Proposal is posted.

3. We submitted an application during Round 1 for one of the APAs listed as eligible for Round 2. What does that mean for our application?

- You do not need to reapply. The application submitted during Round 1 is still being considered.

4. Will the IOB cure during Round 2?

- No. Due to the significantly compressed schedule, the IOB will not be curing any components. Applicants should use the Application Guide as a reference and focus on completing the templates correctly. If there are questions, contact IdahoBEAD@mbakerintl.com.

5. We started an application during Round 1 but didn't complete it. Do we have to start a new application for Round 2?

- Draft applications, or applications submitted after the deadline, have been reopened to allow applicants to complete and submit applications. It is important to note that applicants are required to use the current version of the Application Project Area and BSL Template posted on Link Up Idaho under the "New: Idaho BEAD Application Resources" section of the Subgrantee Selection Process page at <https://linkup.idaho.gov/beadsubgrantee/>. Using the new Round Two template is critical because it lists the 305 APAs eligible for Round 2, which may impact your Round 1 application.

6. Can you share information about the applications received during Round 1 for the 305 APAs that are eligible for Round 2?

- No, the IOB cannot share application details from Round 1. The available data about the 305 eligible APAs includes the unserved/underserved BSL data and APA numbers.

7. Are there any changes to the application for Round 2?

- All the questions and materials are the same. The Application Project Area and BSL Template was updated to reflect the APAs open for bidding during Round 2, and applicants are required to use the Round Two: Application Project Area and BSL Template that is posted on the Link Up Idaho website under the "New: Idaho BEAD Application Resources" section of the Subgrantee Selection Process.

Please be aware that the truncated schedule does not allow for curing, which is why there is an emphasis on completing the templates correctly, especially the Round Two: Application Project Area and BSL Template, Proforma Template, Fixed Wireless Performance Template (if applicable), Network Route Diagram, and Logical Network Drawing.

8. Where can I find the list of APAs that are eligible for Round 2?

- The eligible APAs and BSLs can be found in the Eligible Locations Reference tab of the Round Two: Application Project Area and BSL Template, which is available for download under the "New: Idaho BEAD Application Resources" section of the Subgrantee Selection Process page at <https://linkup.idaho.gov/beadsubgrantee/>.

9. If there are BSLs identified as Community Anchor Institution (CAI) locations in my proposed project area, do I have to commit to serving those BSLs with 1 Gbps symmetrical service?

- Yes. The NTIA rules require all BEAD-funded projects to serve BSLs identified as CAIs at 1 Gbps symmetrical service. If your project will not meet those speeds at the time of project closeout, you must exclude those BSLs and

explain your reasoning. You can identify CAI BSLs in the “Eligible Locations Reference” tab of the Application Project Area and BSL Template, which is discussed in the question above.

10. Can you confirm that all APAs in Idaho received at least one application during Round 1?

- Yes, all 589 APAs received at least one application.

11. May we see the draft BEAD subgrantee agreement?

- It's in draft stage right now, and the IOB intends to publish it at the same time as the Final Proposal. While Idaho will have its own agreement incorporating Idaho-specifics, there is also guidance from the NTIA for states related to certain provisions that are required to satisfy the BEAD rules.

12. Do you have any updates on deconfliction and negotiations?

- There are instances in the case of preliminary awards that have been analyzed and evaluated where severability may be involved. The IOB is working on this task this week and hopes to identify and reach out to applicants where severability may be an issue related to an application from Round 1. The IOB intends to contact ISPs towards the middle or the end of the week of August 25.

13. What is the Round 2 application deadline?

- The BEAD funding application portal will close on Tuesday, September 2, at 12:00 pm MT.

14. Is there an IBAB meeting scheduled?

- Not at the moment, but one will be scheduled prior to the Final Proposal submission. The Final Proposal is due September 25.

15. Does the portal allow multiple users for the same application?

- There is one login and password per entity, but the login information can be shared with multiple people working on the same application.

16. Are there any penalties or consequences for an applicant to withdraw an application or withdraw a bid for an APA?

- There is no penalty for an applicant to withdraw an application prior to the approval of the applicant's provisional award by the NTIA. The applicant must notify the IOB of its decision to withdraw as soon as possible, and the IOB will then determine if the withdrawal impacts its deconfliction and grant award process.

17. How will Idaho structure its BEAD reimbursements?

- The details and requirements of the BEAD reimbursement process will be included in Idaho's subgrantee agreement. The IOB plans to post a draft of

the Subgrantee Agreement by September 4, 2025. Further discussion of IOB's plans for reimbursement requirements and processes within the terms and conditions of a grant agreement can be found in its Initial Proposal, Volume II, Section 2.16, and in the NTIA FAQ documents.

18. I'm looking for the updated templates referenced in your email. However, the templates on the website still show a last update date of July 15. Where can I find the corrected spreadsheets?

- Please ensure that you refresh webpages and documents and clear the cache if necessary.

19. Can you explain the large number of BSLs designated as high cost by the State in APAs 1295 and 1015 in the CSV data? It is our understanding that the State cannot designate high-cost locations.

- The State is not designating high-cost locations. The high-cost locations or areas reflected on the BEAD APA Map 4.0 and associated CSV files were predetermined by the NTIA as locations eligible for a match waiver. The State will determine "excessive cost" at a later date.

20. Other states have defined the high cost per location threshold. Has the IOB determined its high-cost-per-location threshold, and if so, when will this number be publicly released?

- The IOB will determine its high-cost-per-location threshold after the application window closes.

21. Can you verify the end date for the BEAD Benefit of the Bargain Round?

- The closing date for the Benefit of the Bargain Round and the Prequalification Application is Tuesday, the 29th of July, at noon MT.

22. What qualifies as a "Priority Broadband Project" in Idaho?

- To determine whether a project qualifies as a "Priority Broadband Project," each application—regardless of technology—will be assessed against the full definition outlined in the NTIA 2025 Policy Notice. This includes the requirement that a project must "...easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services."

23. What are the penalties or consequences if an applicant withdraws from its funding obligations after receiving an award?

- The penalties for non-compliance or withdrawal from a final BEAD award will be described in the Idaho BEAD Subgrantee Agreement. The IOB plans to post a draft of the Subgrantee Agreement by September 4, 2025. Further

discussion of the IOB's plans for enforcement mechanisms and penalties for non-compliance with the terms and conditions of a grant agreement is discussed in its Initial Proposal Volume II, Section 2.16.Prequalification.

Prequalification

Topics Include: Round 2 Eligibility, Application Window, Previously Prequalified

24. Will the Prequalification Application be reopened for Round 2?

- No, Idaho's Prequalification Application will not be reopening, so Round 2 is limited to the 40 eligible applicants listed on the Link Up Idaho website at https://commerce.idaho.gov/content/uploads/2025/06/IOB-Prequal-Approvals-for-Web_V2_6.5.25.pdf.

25. When will Prequalification open?

- The Prequalification Application and Funding Application opened at noon MT on Tuesday, July 15, 2025, and will close on Tuesday, July 29, at noon MT.

26. If we were preapproved during the Prequalification Application Phase, do we need to resubmit a Prequalification Application for preapproval again?

- No. View a complete list of Idaho BEAD eligible applicants [here](#). If an applicant is already on this list, nothing further is needed. If an applicant is not on this list, then a Prequalification Application must be completed and submitted.

Application Information and Required Certifications

Topics Include: Final Attestation, 1:1 Template Meetings, P.E. Certification, Templates, Period of Performance, Project Name, Similar Prequalification Questions, Minimal BEAD Outlay

27. We submitted an application during Round 1. Do we have to complete another Final Attestation for Round 2?

- Yes, you must complete a Final Attestation for an application submitted during Round 2, even if one was completed during Round 1, because the notarized document is project-specific.

28. When are the Application Project Area and BSL Template meeting options for one-on-one guidance, and how do we sign up?

- To walk through the Application Project Area and BSL Template, please contact IdahoBEAD@mbakerintl.com to schedule an appointment. Times are available Thursday and Friday from 11 am – 3 pm MT for 15 minutes each.

29. Will there be an extension for submitting the P.E. Certification for Round 2?

- The IOB will allow applicants to submit the P.E. certification after the application window closes. The certification must be submitted by September 10.

30. Can applicants input bulk data into the Project Area and BSL Template from other spreadsheets?

- Applicants must use the data provided in the eligible locations tab and cut and paste this data into the BSL Worksheet tab to identify APAs and related BSLs in the project area. If an applicant has data from other spreadsheets that is formatted exactly like the Template, it may be possible to input bulk data where appropriate. Please ensure that ALL BSLs from an APA are inserted into the BSL Worksheet tab.

31. Were there any updates made to any of the application templates?

- Yes, updates were made to the Project Area and BSL, and Pro Forma Templates. These updates can be found below.

Updates to the Project Area and BSL Template:

- Revised the formula in column C of the APA Worksheet tab to exclude BSLs labeled "Prefer Not to Serve" from the count.
- Revised the instructions and examples for Project Name (column M) on the BSL Worksheet.
- Updated the examples in columns C and D of the BSL Worksheet to better align with the Eligible Locations Reference data.
- Added filters to columns A and B on the BSL Worksheet to improve navigability.
- Updated the instructions in column F of the BSL Worksheet to include the sentence: "Leave cell BLANK if you intend to Serve," for added clarity.

Updates to the Pro Forma Template:

- Modified the data validation rules to allow negative numbers throughout the template.
- 32. If we set the start date for a project, let's say October 1, 2026, and we can complete it in 24 months, does the shot clock start on the day we set as the start date, or does it start on the day of the award?**
- The shot-clock or period of performance will begin on the date that the final grant agreement is signed and fully executed.
- 33. We are unable to include all names of the counties and cities in our multi-county project, due to character limits in the portal. How should we handle this?**
- When naming projects, applicants may use abbreviations of county names.
- 34. There are a few application questions that seem to mirror questions that were asked and answered in the Prequalification Application. Do we have to answer those questions again in the Funding Application?**
- Yes, there are some similar questions in the Funding and Prequalification applications. The Funding Application portal is unable to reference responses from prequalification. In addition, questions in the Funding Application are project-specific, whereas the Prequalification Application's questions were more general and applied to the applicant. Therefore, applicants are required to answer all questions in their entirety.
- 35. How will the IOB evaluate the NTIA Minimum BEAD Outlay criteria? How will it consider the NTIA 2025 Policy Notice direction that States must consider the lowest cost projects, but also look at the combination of proposals that will result in the lowest overall cost to the Program?**
- The IOB will consider multiple interrelated factors, as described in the NTIA 2025 Policy Notice and subsequent NTIA guidance, to determine if a project is proposing an “excessive cost;” if a project is the “lowest cost per BSL” in an APA, and if the “combination of projects” will result in the overall lowest cost to the Program.

In areas with competing projects within 15% of each other for the proposed cost per BSL, the IOB will also consider Secondary Scoring Criteria in addition to the Minimum BEAD Outlay scoring and award the project with the highest points.

The IOB will also conduct a “deconfliction and negotiations” phase for overlapping projects that may result in requests for more information, requests to amend a project area, and the possibility of partial awards.

Applicants are encouraged to review the Application Guide, NTIA 2025 Policy Notice, and NTIA FAQ documents for the latest guidance and to submit their best and final proposed project and pricing for each application they submit.

Mapping

Topics Include: Map Updates, APA Mapping, Version Differences, Presumed Ineligible Map Layer, Location IDs

36. Will the State update the Application Project Areas 4.0 map to reflect the eligible APAs for Round 2?

- The map has been updated and set to default to the eligible APAs. Try refreshing the map to show the eligible APAs. If that doesn't work, there is an option within the layers, and under Project Areas, select BEAD APAs 4.0 Round 2 and ensure that the other versions are hidden. The map is found here:

https://experience.arcgis.com/experience/3a16e756139948888232570168c86f72/#data_s=id%3AdataSource_1-197b2fb18f6-layer-90-197eab125f7-layer-94%3A460965.

37. How are CAIs shown on the APA 4.0 map, and do they all have assigned FCC location IDs?

- When evaluating the Idaho BEAD APAs on Map 4.0, some CAIs do fall within an APA, and some do not. The State focused on placing eligible BSLs with assigned FCC location IDs into APAs, and not all CAIs are in this category. For those CAIs not in an APA, if there are remaining funds in the BEAD Program, the State intends to negotiate with subgrantees to get all CAIs connected. Although not all CAIs have FCC-assigned location IDs, the State assigned unique identifiers for all CAIs to ensure data consistency so that there was not a portion with IDs and other CAIs without identifiers.

38. On the Idaho BEAD APA Map 4.0, there are two APA 1113s. Which is the correct one?

- APA 1113 on the Nez Perce Reservation is a part of APA 1599. There are no APAs that cross reservation boundaries. The "true" APA 1113 is in southeast Idaho.

| Location ID | APA Identified on Map | Correct APA |
|-------------|-----------------------|-------------|
| 1120307650 | 1113 | 1599 |

| | | |
|------------|------|------|
| 1120307674 | 1113 | 1599 |
| 1413331832 | 1113 | 1599 |
| 1490309563 | 1113 | 1599 |
| 1490309651 | 1113 | 1599 |
| 1120312049 | 1113 | 1599 |
| 1120312071 | 1113 | 1599 |
| 1120313050 | 1113 | 1599 |

39. On the Idaho BEAD APA Map 4.0, APA 1223 and APA 1389 both include eight BSLs on the Nez Perce Reservation. Which APA do these BSLs belong to?

- The 8 BSLs on the Nez Perce Reservation that are in APA 1223 only belong to APA 1389. There are no APAs that cross reservation boundaries.

| Location ID | APA Identified On Map | Correct APA |
|-------------|-----------------------|-------------|
| 1490274667 | 1223 | 1389 |
| 1490278217 | 1223 | 1389 |
| 1490309609 | 1223 | 1389 |
| 1286801294 | 1223 | 1389 |
| 1286801315 | 1223 | 1389 |
| 1286801316 | 1223 | 1389 |
| 1286801317 | 1223 | 1389 |
| 1286794188 | 1223 | 1389 |

40. Are there any differences between APA Map 3.0 and APA Map 4.0?

- There will be no changes to APAs in terms of makeup, borders, or configuration from APA Map 3.0 to APA Map 4.0. The only item that changed is the list of eligible locations, which were impacted by the following: Lumen RDOF default (adding locations to eligibility), CPF enforceable commitments – Latah County and DIGB2/Idaho County Projects (removing locations from

eligibility), and successful ULFW challenges (removing locations from eligibility).

41. What does the Presumed Ineligible BSLs layer of the APA Map 4.0 include? Are the Presumed Ineligible locations, represented as black dots on the APA Map 4.0, available for download?

- The Presumed Ineligible layer represents BSLs that are currently on the State's BEAD eligibility list, but that the State has determined are non-BSLs and will be submitted as such with Idaho's Final Proposal and accompanying "fp_no_BEAD_locations.csv" file.

These Presumed Ineligible locations can be downloaded from the Link Up Idaho website. Download the [Post 6.6 BEAD Eligible Locations](#), and there is a field called Presumed Ineligible.

42. Are users able to obtain location IDs from IOB's Map 4.0?

- The clickable feature was disabled on the IOB's map due to concerns about Idaho's licensed access to this data. The map displays a location's eligibility classification, and users can download a .csv file with the BSL FCC location IDs and the associated Idaho APA.

Proposed Project Budget

Topics Include: Letter of Commitment, Match Waiver, Pro Forma Template, Letter of Credit/Performance Bond, High-Cost Locations, Project Deployment Timeline Template, Legal Opinion Letter, Financial Capability, Performance Bond, Letter of Credit, Audited Financials, Reimbursements, Match Requirement

43. When is the Letter of Commitment due for Round 2 applications?

- The Letter of Commitment is due nine business days after the BEAD window opens, by September 10. Contact the IOB to discuss any concerns, and the IOB will consider requests for extensions on a case-by-case basis.

44. What is the match waiver process?

- The IOB doesn't have a formal process. Any type of process has to go through IBAB and then a discussion with the NTIA. The IOB requires applicants to use the Budget Template, which includes a narrative field where

the applicant must describe the reasoning behind and the amount of the match waiver. Applicants should be clear and specific with the narrative.

45. Is Idaho supportive of facilitating NTIA match waivers for Round 2?

- The IBAB is the entity responsible for making decisions related to policy, programming project selection, and funding, including facilitating waivers with the NTIA. The IOB does not have a formal process for the match waiver. The Budget Template includes a narrative field where the applicant must describe the reasoning behind and the amount of the match waiver, including specifics. Applicants should be clear and specific with the narrative to allow the IOB to calculate the request.

46. May we use CPF dollars as part of the match for BEAD?

- The most important consideration when using CPF funds as a BEAD match is that the applicant is responsible for ensuring compliance with both CPF/Treasury requirements and BEAD Program rules. Any CPF funds used must meet the eligibility criteria of both programs.

It is common to combine CPF with other private cash or in-kind contributions to meet the match requirement. CPF would be used as a cash match, but it must align with CPF's allowable expenses; ultimately, it is the applicant's responsibility to ensure this.

47. Can an applicant's commitment to cover contingency costs count as part of the required 25% match?

- Not specifically. Applicants cannot specify that their cash match be applied toward any specific budget line items, including contingency funds. Only in-kind match items can be assigned to a budget line item. Cash match for contingency funds cannot be considered "in-kind." See the NTIA's most recent guidance on match here,

https://broadbandusa.ntia.gov/sites/default/files/2025-07/Subgrantee_Qualification_Evaluation_Guide.pdf.

The subgrantee agreement will discuss the monitoring and compliance of an awarded project and how subgrantees will track and report expenses paid for by match, including against contingency funds, and the IOB's review and approval process of those expenditures.

48. Are contingency funds added to an applicant's project budget considered part of the total project cost?

- Yes. Note that applicants are responsible for ensuring that any contingency costs included in their BEAD budgets comply with federal requirements.

Guidance on this can be found in the "read me" tab of the Project Budget Template, which directs applicants to follow the instructions in SF-424C ver 2.0 and further guidance in 2 CFR Sec. 200.2 and 200.307 of the Uniform Guidelines.

49. The bank I am using to get my Letter of Commitment told me that they could write the letter of commitment, but it would have contingency items due to time constraints. Is it acceptable to submit a Letter of Commitment from a bank that has contingencies?

- Applicants may submit a Letter of Commitment that contains a limited number of industry-standard and reasonable contingencies. These contingencies must be cleared prior to an awarded subgrantee submitting its Irrevocable Letter of Credit or Performance Bond.

50. How should applicants use the Project Timeline Template to provide a Capital Investment schedule?

- Applicants are required to provide information about their plans for capital investment over the four years of deployment. The timeline for capital investment should match the applicant's project commitments and detailed budget items. This would include BEAD funds, match amounts, and additional capital investment beyond the BEAD program. Applicants will also be asked to discuss additional capital investment during the 10-year federal interest period on the Pro Forma Template.

51. How should an applicant calculate the match waiver for projects that are only partially in high-cost areas?

- Applicants should calculate their match waiver based on the proportion of BSLs that are located in high-cost areas compared to the total number of BSLs that the applicant will serve. For project areas comprised of multiple APAs, the same methodology applies, using instead the total number of BSLs across all APAs in the project, and the total number of BSLs in NTIA-designated High-Cost census blocks.

As an example:

Step-by-Step Example, using a project area that is a single APA:

1. Calculate the Standard Match:

- For a \$1,000,000 project, the required 25% match is **\$250,000**.

2. Identify High-Cost BSLs:

- In the project area, there are **737 eligible BSLs**.

- Of those, **358 BSLs** are located in **NTIA-designated High-Cost census blocks**.

3. Determine the percentage of BSLs that are in NTIA-designated High-Cost Areas:

- 358 is **49%** of the **737 eligible BSLs**.
- The match is waived for **358 BSLs, or 49%** of the BSLs in the total project area.

4. Recalculate the Match Requirement:

- Applicants may submit a match that is **49% lower** than a “full” match at **25% of total project cost**
- **49% of \$250,000 = \$122,500**
- Subtract the High-Cost BSL total match from the original project cost match:
- **\$250,000-\$122,500 = \$127,500**
- New required match based on the adjusted total = **\$127,500**

52. When filling out the Pro Forma Template, I am unable to input a negative number for years that our company will have negative Operating Cash Flow. How do we include this in our response?

- The Pro Forma template does not require you to include Operating Cash Flow in the Financing section. More generally, note that the IOB has updated the Pro Forma template to allow negative numbers where appropriate.

53. When is the actual Letter of Credit or Performance Bond due to the IOB?

- The Letter of Credit or Performance Bond must be submitted prior to subgrantee agreements being finalized and signed. This will be by the end of December 2025, at the latest.

The IOB will formally notify provisional subgrantees in early September 2025, after the Idaho Broadband Advisory Board (IBAB) approves the provisional awards and when the IOB submits the provisional subgrantee projects and awardees to the NTIA for final approval (target date: September 4, 2025).

Although final grant amounts will not be confirmed until the NTIA issues its approval (IOB has 90 days to approve, approval expected in early December 2025), the IOB will begin working with provisional subgrantees on drafting grant agreements starting in September. The goal is to have all subgrantee agreements fully executed by the end of December 2025. Subgrantees must ensure their Letter of Credit or Performance Bond is ready in time to meet that deadline at the latest, prior to finalizing the subgrantee agreement.

Applicants can find guidance on the documents to be submitted here:

https://commerce.idaho.gov/content/uploads/2025/07/ID-BEAD_LOC_-Flyer-004-1.pdf.

54. I am planning to exclude very high-cost locations from our project. When answering questions in the application and completing the pro forma, should I refer to the budget that covers 100% of the location or the budget that excludes the high-cost locations?

- The application should be filled out based on the number of BSLs that the applicant is proposing to serve, with the "prefer not to serve" BSLs excluded. If an applicant is proposing to exclude BSLs, the only element of the application that assumes 100% of the BSLs served is the Alternative Budget in the Project Budget Template.

55. How should I fill out the timeline in the Project Deployment Timeline template?

- For filling out the timeline chart, please only fill in the blue fields in columns C and D. Columns E – AZ will automatically populate with a timeline. Starting on row 28 of the timeline tab, you will find directions on how to properly fill out the timeline.

56. We are unable to find anything in the Guide or FAQs about a template for a legal opinion letter. Will there be a legal opinion letter required, and if so, do you have a template?

- The legal opinion letter for the Letter of Credit must be submitted with the Letter of Credit after a subgrantee has been selected but prior to the execution of the grant agreement.

57. Question 51 asks for documents showing Additional Financial Capability. Do you have some examples of what you have in mind?

- This question provides an opportunity for an applicant to submit additional financial information related to project financial support, if they would like. There are no restrictions on the type of information that may be shared.

58. Can the Performance Bond or Letter of Credit be an overall dollar amount/is one Bond/Letter per entity sufficient? Does it need to be project-specific?

- The NTIA BEAD Program rules require subgrantees to provide a separate Letter of Credit or a Performance Bond for the amount of each awarded project. Applicants, therefore, must submit a separate and specific Letter of Commitment for the required amount for each proposed application project.

59. In the Location list form, is the cost per location total or grant-only cost per location?

- The IOB requests that applicants submit the total cost per BSL (BEAD request plus applicant match) in Column H of the BSL Worksheet. Additionally, in the APA Worksheet, input the BEAD request amount for each APA in Column E and the associated match amount in Column F.

60. The IOB Funding Application references 47 CFR 54.804(c)(2) (which requires a Weiss Rating of a B- or better) for a LOC. The FCC waived this requirement for its LOC for all its programs. The FCC adopts the criteria to be considered “well capitalized” by at least one of the FDIC, the Federal Reserve, or the OCC. Will the IOB accept this waiver?

- The IOB is required to follow the BEAD Program’s Letter of Credit (LOC) requirements as stated in the BEAD NOFO and BEAD Letter of Credit Waiver Notice. NTIA has very recently updated its rules and issued a new Programmatic Waiver on this topic. The new Administration Notice of Programmatic Waiver from the NTIA can be found here, [https://broadbandusa.ntia.gov/funding-programs/policies-waivers/BEAD LOC Programmatic Waiver Update July 25](https://broadbandusa.ntia.gov/funding-programs/policies-waivers/BEAD_LOC_Programmatic_Waiver_Update_July_25).

These new NTIA rules eliminate the requirement that an applicant may only use a financial institution that has a Weiss Credit rating of B- or better for its Letter of Commitment and its subsequent Letter of Credit or Performance Bond. The new rules state that:

- An applicant may submit a Letter of Commitment from a bank that demonstrates it is “well capitalized” as determined by federal bank regulations promulgated by the Federal Deposit Insurance Corporation, the Federal Reserve, and the Office of the Comptroller of the Currency.
- An applicant may submit a Letter of Commitment from a bank that has a BBB- or higher rating by Nationally Recognized Statistical Rating Organizations, as recognized by the Securities and Exchange Commission.
- An applicant may submit a Letter of Commitment from a credit union that is insured by the National Credit Union Administration.
- In conformance with the Letter of Commitment submitted during the application period, subgrantees with awarded projects will be required to submit an irrevocable Letter of Credit and legal opinion letter prior to finalizing its subgrantee agreement with the IOB. The IOB will continue to monitor the

NTIA BEAD Program rules for any updates by the NTIA and will notify applicants if the rules change.

61. When is the last day to submit an applicant's audited financials?

- Applicants must submit audited financials no later than 66 days from the opening of the application window. If the applicant does not upload the audited financials with the prequalification application in the portal, it must email the completed audited financials to IdahoBEAD@mbakerintl.com.

62. Does an applicant have to use an independent auditor that is also a licensed CPA to produce the audited financials?

- Yes, the auditor must be an independent, certified CPA and must not be an employee of the applicant.

63. Do applicants have to submit a Letter of Commitment regarding the Letter of Credit requirements?

- Yes, during the application process, and no later than 21 days after the close of the application window, applicants must submit a Letter of Commitment from a qualified financial institution. Applicants will not be required to submit the letter of credit unless or until it has been notified of a provisional award. Applicants should review this document's requirements:
https://commerce.idaho.gov/content/uploads/2025/07/ID-BEAD_LOC_-Flyer-004-1.pdf.

64. Please confirm that the IOB will use a reimbursable funding structure with reimbursement no less frequently than every six months. If so, how does this impact the letter of credit requirement?

- Currently, the IOB is considering distributions via a Fixed Amount Subaward. The BEAD program rules require subgrantees to submit a letter of credit at 25% of the subaward or a performance bond at 100% of the subaward, both of which can be reduced during the period of performance when the subgrantee hits certain milestones.

However, subgrantees may choose to submit a letter of credit or performance bond for no less than 10% of the subgrantee award and the applicant must maintain that amount for the entire period of performance. Subgrantees have the discretion to choose between a 25% Letter of Credit or 100% performance bond that can be reduced based on a milestone schedule or a 10% Letter of Credit or performance bond that remains in place.

65. The NTIA cites the FCC regulations regarding the Letter of Credit requirements for the FCC funding programs. Will the IOB implement and follow updates and changes that the FCC has made to its letter of credit submission requirements?

- No, the NTIA has not updated its Letter of Credit requirements for the BEAD program. Applicants are encouraged to review the NOFO and the October 2023 Notice of Programmatic Waiver. While the NOFO states that applicants must submit a Letter of Credit “substantially similar” to the FCC’s requirements in 47 CFR Section 54.804(c)(2), the NTIA did not completely mirror those FCC Letter of Credit rules and it did not direct states to implement subsequent changes to the FCC’s Letter of Credit rules automatically without explicit guidance by the NTIA. IOB will continue to monitor the NTIA BEAD program rules for any updates by the NTIA and will notify applicants if the rules change.

66. What is the match requirement, and what types of funding can be submitted as a match by the applicant?

- An applicant must provide matching funding for at least 25% of the total costs of the project, or it must request a full or partial waiver from IOB. Applicants will be required to describe the sources of their match funding in the Proposed Budget Template, including private capital; in-kind assets such as equipment, facilities, long-term leases; financial support from local, regional, or state agencies, community groups, utilities, and other stakeholders; and federal funding from programs under the ARPA Act of 2021, CARES Act of 2020, Consolidated Appropriations Act of 2021, and Families First Coronavirus Response Act of 2020. **Applicants are responsible** for ensuring that any federal, state, or local grant funds used to meet the matching requirement for their BEAD project comply with the funding rules and authorized uses set by the source of the matching grant funds.

BSLs

Topics Include: BSL Template, Prefer Not to Serve Evidence, NTIA Reason Code Exclusion Evidence, BSL Exclusions

67. Where can you find the information to identify NTIA High-Cost Designated BSLs?

- The Project Area and BSL Template in the Eligible Locations tab identifies the BSLs that are located in NTIA-designated High-Cost areas within each APA. This information is also posted on the IOB website in the [APA Map 4.0](#) and in the [Post 6.6 BEAD Eligible Locations](#).

68. I understand that only 5% of eligible BSLs can be excluded. However, 5% of a number doesn't always equal a whole number. For example, 5% of 17 is only .85. In these situations, should we simply round up to the nearest whole number?

- In instances where the 5% cap is reflected as a decimal or non-whole number, please round up or down accordingly. In the example provided below, the applicant would round up to 1. Any decimal of .50 or lower would round down.

69. The IOB has a 5% cap per APA for BSL exclusion requests outside of NTIA Reason Codes 1-5. If an applicant requests BSL exclusions over the 5% threshold, is the application automatically rejected?

- The application may still be considered if there are no other competing applications for that APA.

70. Can the Project Area and BSL Template be updated to add a column for County Name?

- The Project Area and BSL Template cannot be updated at this time to include a new column for County Name. Applicants should design their projects based on the APAs and BSLs provided in the template. If a project spans multiple counties, applicants may choose which county name(s) to include in the project name, as long as it results in a unique identifier. The specific content of the project name is less important than ensuring uniqueness across applications.

71. In the BSL Template, is a cost estimate required for BSLs that are categorized as Reason Code 1 – Not a Serviceable Location?

- If an applicant has excluded any BSLs for any reason, the alternative budget must still include a cost estimate for all BSLs within the project area, including those excluded. Any BSLs identified as not serviceable – such as those classified under Reason Code 1 – must be supported with appropriate evidence. Additionally, a cost estimate must still be provided for these locations in case the supporting evidence is deemed inconclusive.

72. What evidence is required when selecting "Prefer Not to Serve" for locations in the Project Area and BSL Template?

- Any annotated maps, photos, drawings, screenshots, reports, or any other materials that could provide conclusive evidence to support the claim that a location cannot be served. Reasons for requesting not to serve a location could include high cost, difficult terrain, remoteness, lack of existing infrastructure, or a zoning law issue. Please be thorough in your evidence.

73. What evidence is required when excluding BSLs using NTIA Reason Code 5?

- The required evidence must demonstrate that the location is indeed receiving qualifying broadband service from a non-subsidized provider (NTIA Reason Code 5). Evidence such as: a letter or statement from the provider confirming service, speed test results, customer bill, or references to FCC fabric version 6.

74. How does the 5% cap on APAs relate to removing high-cost locations in each APA?

- The 5% cap, which includes BSL exclusions, is in place to ensure that the IOB achieves 100% coverage of unserved and underserved BSLs in Idaho. If no cap was included, the number of exclusions due to high costs would facilitate the creation of unique APAs that do not align with the IOB's predetermined APAs. The IOB requests that the submitted budget include costs with your "prefer not to serve" BSLs excluded, and an **alternative budget** with costs to serve 100% of the BSLs in the project area.

75. Do BSL exclusions with NTIA Reason Codes count towards the 5% BSL exclusion cap?

- Any exclusions based on NTIA Reason Codes 1-5 do not contribute to the 5% cap. The 5% cap per APA in the proposed project area applies to locations that an applicant prefers not to serve. The 5% cap is calculated using the total

number of BSLs in the APA. Applications with more than 5% of BSL exclusions will be considered less competitive.

76. Is the State requesting documentation for all excluded BSLs, including those excluded for reasons 1–5 (e.g., rocks, barns, no access)? Or is documentation only needed for BSLs we are excluding because they are too high cost (prefer not to serve)?

- Applicants must provide a narrative description and provide documentation to support any request to “prefer not to serve” a BSL in the proposed project area, including a description and documentation of high cost impacts and/or a description and documentation of potential non-eligible BSLs.

Proposed Project

Topics Include: Severability, Round 2 Eligibility, APAs Per Application, 5G, Application Naming, Alternate Budget, Construction Start Dates, Technologies, APA Grouping, Middle Mile Funding, Non-contiguous APAs, APA Costs

New!

77. We are applying for multiple APAs in Round 2 that have to be grouped together for the project to be feasible. How should we let the IOB know that the APAs in the proposed project cannot be severed?

- To inform the IOB about specific details related to your proposed project that includes multiple APAs, please use the Notes column, which is Column N of the BSL tab of the Round 2: Application Project Area and BSL Template, to explain why the project is not severable and must include all APAs and BSLs. Please note that you are required to use the new Round Two: Application Project Area and BSL Template, which is posted on Link Up Idaho under the "New: Idaho BEAD Application Resources" section of the Subgrantee Selection Process page at <https://linkup.idaho.gov/beadsubgrantee/>.

78. Which APAs and BSLs can be applied for during Round 2?

- Round 2 is limited to the 305 APAs that did not receive Round 1 submissions from more than one technology type to encourage participation and competition. Please note that the IOB cannot provide information about the classification of the Round 1 applications.

79. Is there a 60 APA limit per application for Round 2?

- Yes, the 60 APA per application limit stays the same for Round 2.

80. Question 55 asks applicants to discuss scalability to support the deployment of 5G. Can you clarify the reference to 5G?

- The requirement for a Priority Network to scale to 5G is referencing the cellular network standard "5G," also known as "5th Generation." This requirement for networks to scale to support the deployment of 5G is further discussed in the NTIA 2025 Restructuring Policy Notice.

81. Is there an opportunity for applicants to provide information and data about APAs that can be severed from the projects? Are applicants supposed to calculate the match on separable APAs?

- The application questions and the Project Area and BSL Template require applicants to break down their costs and match them to the APAs that are included in the proposed project area for each application. The cost and match breakdown by APA is up to the discretion of the applicant, but the totals must be consistent across all answers in the application materials. The application materials do not request information about severability preferences or to provide a severability analysis at this point in the process. The IOB review team will process the applications and conduct a deconfliction process for those applications with overlapping project areas. *The IOB and its reviewers will reach out to individual applicants about the possibility of updating or revising an application project area only when necessary.*

82. When naming applications, how should we handle applications with APAs in more than one county?

- The order of the county names is up to the applicant. If you find that using all the names of counties exceeds the character limit in the portal, applicants may use abbreviations of county names.

83. Since I am required to include an alternate budget with costs for locations I would prefer not to serve, will I still be obligated to serve those locations if I am awarded the grant?

- Submitting a BEAD application in no way obligates the applicant to take on a project that they do not want. Provisional awards and announcements will be made based on evaluating, scoring, deconflicting, and negotiating. However, a grant award is not finalized or formalized until an executed grant agreement is in place.

84. If we're considering applying for multiple APAs, may we include all in one application, or should each area be submitted separately? For example, the general criteria would be the same for all areas, but each area would have

its own budget, timeline, etc. The application process allows for multiple APAs; practically speaking, how would we distinguish, for analysis purposes, APAs as separate projects?

- Applicants may combine deployment projects in different APAs, including non-contiguous APAs, into a single project application, covering up to 60 APAs. The decision on whether to combine projects is at the discretion of the applicant. However, each application must combine the information for all deployment projects and include only a single budget, timeline, financial forecast, and answers to the individual questions. Applicants cannot submit multiple budgets or documentation for different deployment areas in a single application.

85. The construction start date for our project is unknown at this point, as the grant approval date is unknown. How should we manage this in questions that need a construction start date?

- We suggest applicants do not use a construction start date prior to December 31, 2025. Reason: NTIA has established that the State's Final Proposal is due on September 4, 2025, and the NTIA will review it by December 31, 2025. Subgrantees cannot be finalized until the Final Proposal is approved. Ideally, Idaho subgrantees can begin construction in the next construction season.

86. Regarding Question 28, if using a mixed technology solution, does the question ask for an average of the speed offered in the project area or the maximum speed of one of the technology types only?

- No. The questions that ask for the applicant's committed network performance, including mixed technology deployments, require applicants to provide the single maximum speeds and minimum latency that the network will be capable of providing to all served BSLs in the application's proposed project area at the time of completed deployment.

87. How do I determine the number of remote nodes to add to the bid? For example, if an APA has 500 eligible, do we bid to purchase all 500? If and is this cost reimbursable?

- Applicants must plan for the required level of network capacity to meet the BEAD program requirements and applicant commitments for the four years of construction and the 10 years of the federal interest period. As part of the applicant's submission, it will be required to provide budget, equipment, and forecasts to meet its commitments. Applicants are also required to provide an alternative budget to serve the project area if BSL exclusion requests are granted. If awarded, subgrantees will only be reimbursed for the purchased

items necessary to complete the project in compliance with the final approved project design and the subgrant agreement terms and conditions.

88. Ookla data currently shows that less than 18% of Starlink customers consistently achieve 100/20 speeds. Will LEO applications be given Priority Broadband Status?

- Applications that are submitted with a LEO solution will be evaluated on a case-by-case basis. The application itself, the geographic landscape of the project area, and other factors will be considered when making a Priority or Non-Priority determination. Part of the Priority and Non-Priority analysis will be dictated by information provided in the application and other documentation submitted. There will be instances when a LEO project may be considered a Priority Project in some areas of the state but may be considered Non-Priority in others.

89. Does the program support funding for middle-mile infrastructure? If yes, how will applicants be required to separate out the requested funding for middle-mile facilities from last-mile facilities?

- Yes, the Program will provide funding for building and deploying middle-mile infrastructure that the applicant demonstrates is necessary to ensure the technical feasibility and financial sustainability of the last-mile portion of the proposed project. The application materials ask specific questions about the request for funding for middle-mile facilities and require applicants to break out any middle-mile costs and equipment, which must be shown separately on the network route map.

90. May applicants combine non-contiguous APAs into a single project area? Is there a limit to the number of APAs an applicant can include in an application?

- Yes, applicants may combine multiple contiguous and/or non-contiguous APAs into a single proposed project area and a single application. Applicants are allowed to include **up to** 60 APAs in a single application. For example, if an applicant wants to apply for 254 APAs, it must submit five applications.

91. Will applicants be asked to provide a breakdown of costs per APA?

- Yes, applicants are required to break down their project costs by APA in the Project Area and BSL Template. Applicants are expected to be as specific as possible and to account for the different characteristics of each APA that may impact deployment costs.

Technical Documents

Topics Include: Network Route Diagram and Logical Network Drawing, File Formats and Submissions, Fixed Wireless Performance Template, PE Stamp, Technology Selections, Scalability Documentation, LEO Scalability Analysis

92. If we have shapefiles over several APAs, should that single shapefile include all of the APAs, or can we submit separate files for each APA?

- A single shapefile for all the APAs is preferred.

93. Can you provide examples of what you are looking for in Question 67, which requests a Network Route Diagram, and Question 68, which requests a Logical Network Drawing?

- The Application Guide provides applicants with information on the requirements and expectations for these questions. The applicant's response to these questions should provide the reviewers with detailed technical information about the network route and design for the proposed project. While the level of detail is up to the applicant, these documents do not have to be in a formal, engineered, permit-ready format; however, they should provide, at a minimum, the listed elements in the Guide in an industry-standard, easy-to-identify, and understandable manner. The Guide has specific directions for the Route Diagram. An **example** of a Logical Network Design for a broadband fiber network can be found here: https://www.tutorialspoint.com/ftth/ftth_quick_guide.htm. However, the level of detail and included elements in this design is up to the discretion of the applicant.

94. I need clarification on a file type for network drawings. May we submit GPKG or GeoPackage files?

- Yes, a GPKG or GeoPackage file will be sufficient. In addition to those, geodatabases (.gdb) will also be accepted.

95. What information needs to be included in the Clutter Category of the Fixed Wireless Performance template?

- Only include the primary clutter category considered in the planning software for that sector.

96. Regarding question 74, how will applicants determine when a network will have areas that have a 432 fiber strand count on main lines but may only have a 12 fiber strand count on side roads, etc.?

- Please see the Funding Application Guide, which states: *For Question 74 regarding the fiber strand count, answer using the following format: 'XX fiber strand count @ XX miles' for each segment of the network identified by the applicant.*

97. In Question 59 of the Funding Application, can a hybrid FttP-LFW project select more than 1 drop-down?

- The question requires applicants to indicate the single maximum speed that the network will be capable of providing to all served BSLs in the application proposed project area approximately four years after the project is completed and deployed.

98. Can a zipped shapefile be submitted as part of the Fixed Wireless Performance upload?

- The Funding Application portal will accept uploads up to 5Mb. If a file exceeds that size, please send the attachment to us in an email at grants@commerce.idaho.gov along with the application name and question number.

99. What specific technical documentation or evidence will the state require to verify scalability?

- The requirements to determine Priority and Non-Priority Projects (speed, latency, scalability) will be evaluated on whether or not the project meets the technical standards and capabilities as identified in the NTIA 2025 Policy Notice and in subsequent NTIA FAQ guidance, including NTIA FAQ V.12, Q.3.23. IOB's BEAD Funding Application Guide and the questions themselves provide more detail regarding the specific types of information and documentation that will be required to allow and support reviewers/evaluators in making those determinations.

100. How will the IOB analyze claims by LEO and fixed wireless so that they can meet speeds and scalability for a Priority Project?

- The responses to the IOB's BEAD application questions and required templates will provide sufficient detail for our third-party reviewers to evaluate all applications equitably, regardless of the technology that the applicant proposes to deploy.

101. What level of engineering is required for BEAD applications? How does this relate to what a licensed Professional Engineer (P.E.) is required to certify?

- The application materials request detailed responses and documentation of an applicant's project design, including planned equipment, facilities, reliability, backhaul, network route, interconnection, logical design, and other details of the proposed project. The IOB encourages applicants to be as detailed as possible at this stage of the project design to give the IOB enough information to support the funding request. Subgrantees will be required to provide further detailed engineering drawings and technical information as part of their commitment to the awarded grant funding.

The P.E. Certification is required to demonstrate that a P.E. has reviewed all application materials, including the budget, timeline, and technical details, and can certify that the project will meet the applicant's performance commitments to all locations in the project area and within the promised timeline.

Professional Engineer (P.E.) Certification and documentation verifying that the funded network will meet BEAD Program performance standards at all eligible locations within the committed project timeframes is required for each project at the time of submission.

Tribal Consent

Topics Include: Documentation Submission

102. If a Tribal government is required to obtain a vote of its Tribal leadership prior to signing and submitting the attestation template for the Funding Application for a project on Tribal land, how should the Tribal applicant notify the IOB if the attestation cannot be submitted by the deadline?

- Due to unique Tribal government requirements, the IOB will allow Tribal applicants to upload the completed attestation in the portal no later than 21 days after the close of the application window, or the application will be rejected. A Tribal applicant must notify the IOB prior to the close of the application window via the IdahoBEAD@mbakerintl.com email address that it will submit its signed and notarized attestation after the deadline. The Tribal applicant must also specify the date when the attestation will be submitted, no later than 21 days after the close of the application window.

Low-Cost Service Option

Topics Include: Requirements

103. What is the Low-Cost Service Option (LCSO) requirement for the IOB's BEAD program?

- Applicants must commit to offer an LCSO throughout the 10-year federal interest period, or in the case of a LEO subgrant, the 10-year period of performance (see RPN, Appendix C). If an applicant seeks flexibility to change the rates of the LCSO charged to subscribers over time, then it must state the methodology it will use to set the LCSO rate in the future (e.g., tied to inflation or changes in the FCC's urban rate benchmark, etc.) in its subgrant application.

BABA and EHP

Topics Included: EHP Level of Detail

104. What level of detail is required when answering Environmental and Historic Preservation (EHP) questions? For example, is stating that there are wetlands throughout the project area acceptable, or is a detailed description of the sensitive areas required?

- Answers to EHP questions are project-specific. Include all details that you anticipate may impact the project, what you already know about the project area, and any other important details that the IOB should know. These details will help the state with planning and what should be taken into consideration. Plan your EHP and BABA processes to ensure that you're in compliance with all applicable federal laws.

Applicants may reference an NTIA mapping tool that provides map layers that identify environmentally sensitive areas using federal data, including permitting requirements, historic places, and critical habitat. The NTIA Mapping tool is here:

<https://nbam.maps.arcgis.com/apps/instant/portfolio/index.html?appid=c7906b72e14045bf9fa6fe9addd469a0>.

Applicants are encouraged to use additional NTIA tools that support EHP and NEPA compliance. These are known as the NTIA Permitting and Environmental Information Tool and a second, the ArcGIS Pro Permitting and

Environmental Information Tool (APPEIT). The NTIA Permitting tool enables users to input a project area and identify which layers from the NTIA's permitting and NEPA mapping resources overlap with the applicant's project. The second tool includes support material for applicants to review about the BEAD EHP processes. These will allow applicants and the IOB to gauge the necessary compliance work under the BEAD Program EHP rules.

The NTIA Permitting and Environmental Tool is here:

<https://nbam.maps.arcgis.com/apps/instant/portfolio/index.html?appid=c7906b72e14045bf9fa6fe9addd469a0>.

The APPEIT Tool is here:

<https://nbam.ntia.gov/content/37fa42c6313e4bdb9d8a9c05d2624891/about>.

The IOB Application Guide includes these links and others in the discussion of Questions 105-107.

Scoring

Topics Include: Preliminary Awards, Secondary Criteria

105. Is it possible to know which applications won preliminary awards?

- The State is not in a position to release that information at this time because it does not have permission from the NTIA to publish the preliminary awards. The preliminary winners will be posted at a later date and will be published as part of the State's Final Proposal, which will be open for public comment prior to September 25.

106. How will a project that proposes a fiber/wireless technology solution be scored?

- Per the NTIA 2025 Policy Notice, all projects that reach the second round of scoring will be evaluated across the proposed project's speed to deployment, speed of network, latency, and other technical capabilities.