BEAD FINAL PROPOSAL

September 2025

IDAHO DEPARTMENT OF COMMERCE

OFFICE OF BROADBAND

Link Up Idaho

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Contents

Overview

The [Broadband Equity, Access, and Deployment (BEAD) Program](#) is a federal program that provides $42 billion nationwide to expand high-speed broadband access. BEAD was funded by the Infrastructure Investment and Jobs Act and is overseen by the [National Telecommunications Information Administration (NTIA)](#). BEAD prioritizes unserved locations that have no internet access or limited access under 25/3 Mbps and underserved locations that only have access under 100/20 Mbps.

Idaho was **awarded $583 million** in BEAD funds to ensure that every Idaho resident has access to high-speed, reliable, affordable broadband access.

Formed in 2020, the Idaho Office of Broadband was created to help Idaho Communities improve broadband infrastructure in support of improving distance learning, remote work, access to telehealth, and ensuring communities have reliable internet access. The Idaho Office of Broadband (IOB) is housed within the Idaho Department of Commerce and works closely with the Idaho Broadband Advisory Board (IBAB).

The IOB has designed its Subgrantee Selection Process to support ongoing investment in last-mile broadband infrastructure, aiming to bring affordable broadband service to all unserved and underserved locations in Idaho. The IOB and IBAB have conducted a fair, open, equitable, transparent, and competitive Subgrantee Selection Process for last-mile broadband deployment projects based on the NTIA-approved Idaho Initial Proposal Volume 2 (IPV2) and subsequent updates to the NTIA BEAD Program rules, including the June 6, 2025, NTIA BEAD Restructuring Policy Notice (RPN).

The related attachments establish that IOB's process resulted in an efficient and effective use of BEAD funds to achieve Idaho's broadband objectives. Through this process, the IOB received applications from a variety of providers that proposed to deploy fiber, licensed and unlicensed fixed wireless, and Low Earth Orbit (LEO) technologies to serve all eligible Broadband Serviceable Locations (BSLs), ensuring universal availability of broadband service in Idaho.

Idaho's Subgrantee Selection Process was successful. A mix of technology types from a variety of service providers will ensure all eligible BSLs will be served. The provisional list of technologies includes the following breakdown by percentage of BSLs served:

- 42% Fiber
- 17% Fixed Wireless
- 25% LEO
- 16% Mixed

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 Attachment

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

See Attachment

0.3   Attachment (Required): Complete and submit the Locations CSV file (named "*fp_locations.csv*") using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.

See Attachment

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 Attachment

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   Attachment (Required – Conditional on a 'Yes' Response to Intake Question 0.5): Complete and submit the CAIs CSV file (named "fp_cai.csv") using the NTIA template provided. Although CAIs are not included under (f)(1) deployment projects, to confirm the Eligible Entity's compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTIA 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.

BEAD Final Proposal

See Attachment

1 Subgrantee Selection Process Outcomes (Requirement 1)

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.
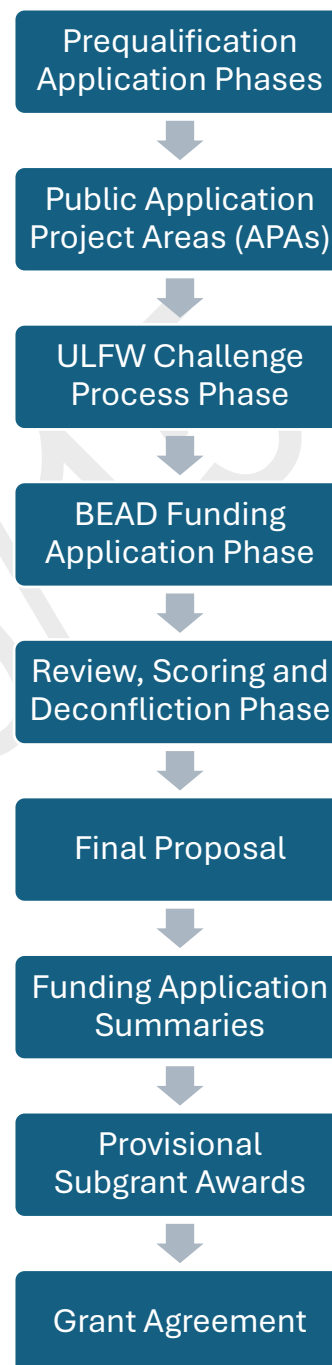
Timeline

The IOB has initiated a multi-step process for selecting subgrantees and awarding BEAD subgrants:

1. **Prequalification Application Phases**: The Prequalification Application required potential applicants to demonstrate compliance with gating criteria that demonstrated their financial, managerial, operational, and technical capabilities. Only prequalified applicants were allowed to participate in the BEAD Funding Application Phase. The initial prequalification application window consisted of two rounds conducted over 44 days, closing on March 27, 2025. A third 14-day phase ran concurrently with the Idaho BEAD Funding Application in July 2025.

2. **Publication of Application Project Areas (APAs)**: The IOB published the APA 2.0 map on March 13, 2025, for public comment. An updated version of the map, APA 3.0, was created to incorporate feedback from public comments. The current version, APA 4.0 map, was published on the IOB Link Up Idaho website in July of 2025 and reflects an updated and final list of eligible APAs and BSLs, pursuant to instructions from the NTIA RPN.

3. **Unlicensed Fixed Wireless (ULFW) Challenge Process Phase**: With direction from NTIA in its RPN, the IOB opened a challenge process in June 2025 specifically for Unlicensed Fixed Wireless providers. This process allowed ULFW providers to submit evidence to prove that they offer service meeting BEAD-level requirements to BSLs currently listed as underserved or unserved. This process lasted 14 calendar days and resulted in limited changes to the IOB BEAD eligible locations list.

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4. **BEAD Funding Application Phase**: Prequalified applicants, or applicants with a pending prequalification application, submitted proposed projects and supporting documentation in July 2025. The application window was open for 14 calendar days. With approval from the NTIA, and pursuant to the IOB's Initial Proposal Volume 2, the IOB opened a second round of funding in August 2025 for seven calendar days.

5. **Review, Scoring, and Deconfliction Phase**: Funding applications were reviewed, scored, and ranked by a third-party reviewer. The reviewer and the IOB conducted application deconfliction and discussions with applicants as needed. This phase took approximately two weeks for the first round and one week after the close of Round 2.

6. **Final Proposal**: The IOB posted a draft of its Final Proposal and held a public comment period for seven calendar days. The IOB updated its Final Proposal in response to comments and submitted its final draft to the NTIA for review and approval on September 25, 2025.

7. **Funding Application Summaries**: Descriptions of funding applications received by the IOB were posted to the Link Up Idaho website.

8. **Provisional Subgrant Awards**: The IBAB approved and announced provisional subgrants.

9. **Grant Agreement**: After the NTIA approves the Final Proposal, the IOB will finalize the subgrant agreements with BEAD subgrantees to begin the BEAD grant period of performance.

Prequalification Application Phases
↓
Public Application Project Areas (APAs)
↓
ULFW Challenge Process Phase
↓
BEAD Funding Application Phase
↓
Review, Scoring and Deconfliction Phase
↓
Final Proposal
↓
Funding Application Summaries
↓
Provisional Subgrant Awards
↓
Grant Agreement

Link Up Idaho

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Application Process

Prequalification Phase

The IOB conducted a separate Prequalification Phase (Prequalification) for its Subgrantee Selection Process. Prequalification allowed applicants to demonstrate their financial, managerial, operational, and technical capabilities without reference to a specific proposed project.[1] Prequalification also required applicants to certify their understanding and the ability to comply with several specific BEAD Program rules and federal regulations. Applicants were required to provide audited financial statements, a demonstration of their managerial capabilities, a demonstration of their operational capabilities, including prior history with public funding, and documentation of the authority to do business in Idaho.

To participate in the Funding Application phase, applicants were required to participate in Prequalification and to satisfy the requirements mentioned above. This process gave applicants a preview of the BEAD Program requirements and an opportunity to determine if they had sufficient resources and expertise to participate in the BEAD Program before submitting a Funding Application. Additionally, Prequalification allowed the IOB to more effectively distribute its review team resources and to put resources in place before the more involved Funding Application phase.

During Prequalification, the IOB utilized a web-based portal for applicants to input their information. As described in the IPV2, the IOB publicized the Prequalification Application materials, including a preview of the questions and a detailed Application Guide. These materials, along with other resources, explained the application process and provided information about the BEAD Program rules. The IOB also held several open office hours for potential applicants and published and continually updated a Frequently Asked Questions (FAQ) document based on questions and feedback received.

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[1] The IPV2 provided a detailed description of the Prequalification Phase requirements and planned application questions. IOB requested and received minor updates to its Prequalification Phase rules, including a clarification that certain elements of the Prequalification Phase will be considered and scored as part of the Funding Application phase.

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Prequalification was conducted as follows:

- The IOB opened the Prequalification Application window for 30 days.
- The IOB review team conducted a review and curing process.
- To promote fairness and competition, the IOB reopened the Prequalification window for 14 days.
- The list of successful applicants was sent to the IBAB for review and approval.
- The IOB issued a detailed memo to prequalified applicants with instructions regarding follow-up action items for audited financial statements and other requirements that needed to be completed before the end of the Subgrantee Selection Process.
- The IOB published the list of prequalified applicants on the Link UP Idaho website.[2]
- After the NTIA issued the RPN, the IOB reopened its Prequalification window to run concurrently with the Funding Application window.

The IOB's Prequalification Phase prequalified 40 applicants, who were allowed to apply during the Funding Application Round.

ULFW Challenge Process Phase

The RPN directed states to conduct a challenge process for ULFW providers. States were required to allow ULFW providers to submit evidence to support claims that they serve designated BEAD-eligible locations.[3] During the IOB's initial Challenge Process held pursuant to the Initial Proposal Volume 1, locations served entirely by ULFW were classified as unserved.[4]

This additional ULFW challenge process was specifically tailored to meet the RPN requirements. These new rules directed states to allow applicants to use ULFW technology in a BEAD-funded project and to request updates to locations served by ULFW as ineligible for BEAD funding where the ULFW service meets specific requirements.

Idaho published and distributed its notice about the Challenge Process directly to ULFW providers via email and to other interested stakeholders via the IOB general email list

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[2] Approved BEAD Prequalified Applicants (June 5, 2025),
https://commerce.idaho.gov/content/uploads/2025/06/IOB-Prequal-Approvals-for-Web_V2_6.5.25.pdf
[3] RPN at Section 3 and Appendix A
[4] IOB IPV1 at Section 1.2.2

and posting on its website on June 17, 2025.[5] On June 24, 2025, the IOB distributed a detailed packet of challenge process materials to those ULFW providers who notified the IOB of their intent to submit a challenge by the deadline. Challengers then had seven calendar days to return their materials and submit a formal challenge. Challenges with sufficient information to prove their claim would result in locations served with ULFW being changed from "unserved" and eligible for BEAD Program funding to "served" and thus not be eligible for BEAD Program funding.

The IOB made itself available to all ULFW challengers by providing technical support and holding an open office hour event on June 25, 2025.

The IOB review team conducted a completeness review of the ULFW submitted materials and a technical review of the coverage and performance claims. To ensure consistency and fairness when reviewing, at least two reviewers analyzed each ULFW challenge to come to an agreed-upon recommendation.

During the ULFW challenge process, Idaho received six challenges. After reviewing the submitted materials, the IOB accepted one of the challenges and updated its APA Map 4.0 to reflect the challenged BSLs' updated status as "served."

The review team presented their recommendations to the IOB, who reviewed the challenge process, submitted materials, and reviewer recommendations in the context of Idaho's policy goals for the BEAD Program and made the final determination to accept or reject the challenges.

Funding Application Phase

The IOB opened its Funding Application window on July 15, 2025, and it remained open for 14 calendar days. The IOB requested, and was granted, an extension of its Final Proposal deadline so that it could accept a second round of BEAD funding applications starting August 26, 2025, for seven calendar days.

Despite the RPN's significant changes to the BEAD Rules as they applied to the IPV2 and IOB's planned Subgrantee Selection Process, the general funding application framework and review process remained consistent with the IPV2.

The IOB's process for both rounds of its Funding Application phase included a comprehensive review of all submitted materials, including an evaluation of each project's feasibility, compliance with program requirements, and alignment with strategic

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[5] IOB Notice of ULFW Challenge Process (June 17) https://linkup.idaho.gov/wp-content/uploads/2025/06/ULFW-Notice-6.17.25.pdf

priorities. This process was conducted by a third-party review team and divided into four phases:[6]

- Compliance and Completeness Review
- State Administrative Review
- Committee Scoring Review
- IBAB Review and Selection

In light of the compressed timeframe resulting from the RPN, some of these phases ran concurrently. Specific discussion about key elements of this application review process can also be found below in **Requirement 12 (Substantiation of Priority Broadband Projects)** and **Requirement 13 (Subgrantee Selection Certification)**.

Compliance and Completeness Review

The IOB third-party review team conducted a Compliance and Completeness review for each submitted application. Completeness reviewers determined whether applicants submitted all the necessary information for review, as defined in the BEAD Program Rules, IPV2, application materials, and scoring criteria. The IPV2 specified the required topics for the questions in the Funding Application.[7] The IOB updated the application pursuant to the RPN and removed or amended several sections.[8]

Reviewers were required to use a detailed Reviewer's Guide that included BEAD Program rules, the NTIA and the IOB guidance, and other application materials when reviewing each application. The IOB review team developed a data-driven process and review portal to ensure consistency, accuracy, and clear organization of the application data. Reviewers were directed to ensure that their comments were clear, direct, and succinct to describe an application's deficiency or concerns about specific responses or uploaded material.

In the event reviewers deemed a submission incomplete, non-compliant, or unclear, the application was flagged as "needs further review" in the review portal. Under the compressed RPN timeframes, especially during the IOB's second round of funding applications, the IOB did not present a formal curing process but, instead, informed applicants that it reserved the right to request clarifying or updated information for applications that were incomplete or non-compliant.[9] Applicants were further informed

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[6] IPV2 Section 5.7 (Section 2.4.1)
[7] IPV2 Section 5.7.2 (Section 2.4.1)
[8] RPN Section 4
[9] RPN Section 3.3; NTIA BEAD FAQ 3.35 The curing process adopted by IOB pursuant to the RPN, as described in it Funding Application Guide, is also in compliance with the curing process as described in the IPV2

that failure to make good faith efforts to respond to the IOB's requests by the provided deadline may result in the rejection of the application(s).[10]

To maintain procedural fairness and ensure compliance with the NTIA mandates during the highly constrained timeline of the Subgrantee Selection Process, the IOB implemented a targeted cure process. During the first round of the Funding Application phase, the IOB allowed applicants to cure four critical application deficiencies that, if not corrected, would result in a classification of the applicant's project as a Non-Priority Project or an outright disqualification due to non-compliance with the Program rules.[11] These deficiencies included omissions in sections required to establish baseline eligibility for Priority Project determination. During the second round, the IOB only allowed for limited clarifying questions or opportunities to fix simple but impactful errors.

All relevant applicants were notified of any or all of the four specific deficiencies identified in their submissions and were given 24 hours to correct and resubmit only the impacted elements. This rapid response cure window aligned with the NTIA guidance, encouraging states to treat applicants consistently while ensuring that subgrantee selection proceeded per the mandated timelines and criteria.

For any other omissions or inconsistencies in the submitted applications, the IOB reserved the option to consider such application deficiencies in subsequent phases of the review process, but only when:

1. The application qualified as a Priority Broadband Project, per BEAD Program definitions and technology performance thresholds;
2. The applicant submitted the lowest-cost bid, or a bid within 15% of the lowest-cost proposal for that location or area; and
3. The proposal was eligible for evaluation under the Secondary Scoring Criteria when triggered by the presence of multiple comparable bids.

If the application moved forward through the process, IOB used its discretion to follow up on errors and inconsistencies where a failure to comply prevented a review and analysis of the proposed project or could result in non-compliance with BEAD Program rules. This structured curing process upheld the BEAD Program's core principles

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Section 5.7.2 (Section 2.4.1) which does not set a specific curing process but only states it "may choose" to provide up to ten calendar days for applicants to cure their submission.
[10] IPV2 Section 5.8 (Section 2.4.1)
[11] NTIA BEAD FAQ 3.35

of fairness, transparency, and competitiveness, while ensuring only fully compliant and technically viable applications proceeded to final evaluation.

State Administrative Review

The State Administrative and Technical Review team reviewed applications to determine the technical, financial, operational, and managerial capability and feasibility of each project. These "gating" criteria were not specifically scored, but reviewers analyzed applicants' demonstration of their capabilities in these criteria, looking for comprehensive and strong responses to the relevant application questions.

Technical reviewers applied their training and experience to assess the feasibility and reasonableness of the applicants' network design, network resilience, scalability, equipment, and other responses to technical questions, using industry standards, applicant evidence, and reviewer knowledge for the proposed technology. Reviewers overlaid the technical components of the application with the financial data provided and timelines for construction, environmental reviews, permitting, and other project components to assess whether the project's costs and timeline align with the technical proposal.

Technical reviewers were asked to thoroughly review each applicant's performance commitments to determine compliance with the BEAD Program rules, including the scalability requirements of the RPN.[12]

Reviewers used this information, as well as a holistic review of other gating criteria, to classify a project as Priority or Non-Priority on a per-project area basis. More information about this part of the review process is provided below in response to **Requirement 12 (Substantiation of Priority Broadband Projects)**.

This phase of the application review also included a review by trained and experienced financial reviewers of the key financial data submitted in the application. These reviewers evaluated the applicant's Pro Forma Template, Budget Template, and responses to several financial-related application questions. This review also included a verification of the applicant's letter of commitment, which is required for the letter of credit obligations. The review included checks on the financial health, sustainability, and growth of the proposed project, cash flow projections, the type and level of financial risks presented by the project, and a comparison of benchmarks.

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[12] RPN at Section 3.1; NTIA FAQ 2.11

The results of this gating criteria review were then overlaid with the scoring process, as discussed below, and used in subgrant determinations.

Committee Scoring Review

Applications that passed the reviews for completeness and managerial, financial, and technical capability were also subject to a scoring review and any necessary deconfliction and negotiation.

The IOB review team developed a data-driven process that gathered key elements from each application into an analysis and scoring tool that applied the IOB Scoring Matrix comprehensively and consistently across all applications. Further discussion of the IOB Scoring Review process is below in **Requirement 13 (Subgrantee Selection Certification)**.

Deconfliction

In APAs with competing applications in both rounds of the Funding Application phase, the IOB conducted a thorough deconfliction and negotiations process as a final step in the Committee Scoring Review process.

During this process, the IOB's review team determined the number of APAs that had multiple competing Priority Projects with comparable costs. For each of these APAs, the review team compiled data into a review tool that compared the projects' Primary and Secondary Criteria scores, funding request and match amounts, broadband performance commitments, and number of excluded BSLs. Other considerations included whether any part of the APA was considered high cost or difficult to serve, and whether any of the applicants were awarded funding in a neighboring APA.

The review team identified the strongest Priority Project in each APA that would maximize the number of BSLs served with high-speed, scalable broadband service cost-effectively and efficiently.[13] These projects were identified as the preliminary winners of their respective APAs.

If the preliminarily awarded project did not propose to serve all eligible BSLs in the APA, the IOB reached out to the other eligible applicants that proposed to serve the APA or adjacent APAs to determine if any of those applicants would accept partial funding to serve the remaining BSLs. If the applicant declined or withdrew, the IOB identified

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[13] RPN Section 3.3; NTIA BEAD FAQ Q. 2.15 (when comparing competing projects, Eligible Entities must ensure that applicants meet gating criteria in addition to Scoring Criteria), 3.15 (when comparing projects, Eligible Entities may consider lowest overall cost to the Program in addition to minimal BEAD outlay for each specific project),

affected BSLs and continued to reach out to other competing applicants in the area to cover these remaining BSLs and any newly available areas. In some cases, the IOB awarded a Non-Priority Project in the area to cover some or all of the remaining BSLs.

IBAB Review and Selection

As further discussed below in response to Q.1.4, Idaho statutory law requires the IBAB to review and approve the IOB's recommendations for broadband funding for all broadband programs. The IBAB previously reviewed and approved the Initial Proposal, Scoring Matrix, and Application Guides. The IBAB also approved the updates to these materials required by the RPN prior to the start of the Funding Application phase.

The IBAB also reviewed and approved the provisional awards. The IOB and the third-party review team prepared an information packet for the IBAB that summarized the list of recommended provisional awards. The IBAB followed stated policy goals as outlined in the Idaho Broadband Strategic Plan, as further developed through the IPV2, and as updated by the RPN and subsequent guidance. The IBAB reviewed and approved the Final Proposal and the final list of provisional awards with the understanding that each will be subject to NTIA review and final determination.

Application Project Areas and Mapping

The IOB conducted its initial BEAD Challenge Process between May and October of 2024. The IOB closely followed the guidance and rules for the Challenge Process as described in the BEAD NOFO Section IV.B.6 and in its Initial Proposal Volume 1 (IPV1).[14] The IOB received 971 challenges that increased the total number of eligible BSLs in Idaho by 20,000.
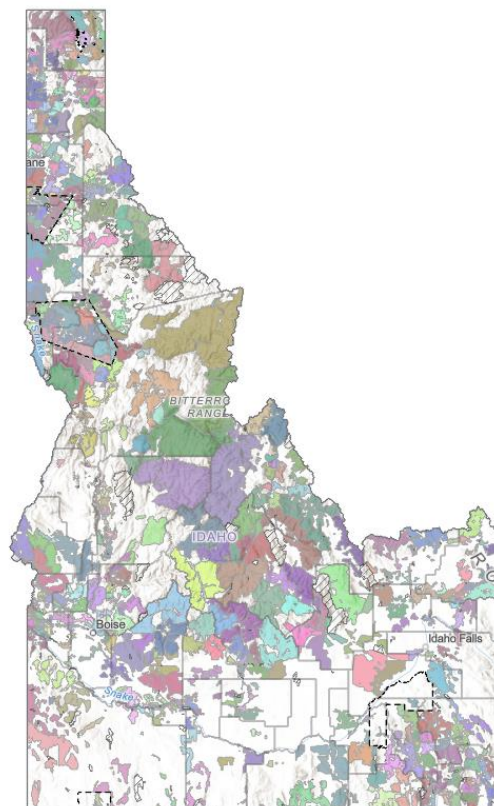
BEAD Final Proposal

Application Project Areas

After receiving approval of its final BEAD Eligible Locations list from the NTIA, the IOB developed its project areas pursuant to its approved IPV2.[15] The IOB clustered census blocks to create 589 APAs. The IOB designed its APAs thoughtfully, considering the technical and financial needs of ISPs serving Idaho, as well as data from other grant programs, density, topology, terrain, and the communities within each APA.

The IOB also placed Tribal lands in their own APAs. Each of the five federally recognized tribes in Idaho was given the opportunity to either A) designate the entire reservation as a single APA, or B) create multiple APAs within the tribal boundaries. Two of the five tribes opted to create multiple APAs within their boundaries.

The IOB published its list of proposed APAs with unique identifiers and provided a map of the APAs that could be accessed online via the Link Up Idaho website. The IOB GIS Team also provided additional map layers for applicants to view the APAs with BSL information, boundaries, the NTIA High-Cost information, and other relevant information and data sets.

Stakeholders were encouraged to submit comments on the APA Map, and in response to public comments, the IOB updated and revised the design of the APAs.[16] The IOB updated the map two additional times based on public comment. The IOB made final updates to the map in response to guidance and direction from the NTIA in its RPN. The most recent version (4.0) of the APA map is posted on the Link Up Idaho website.[17]

The IOB's Subgrantee Selection Process allowed applicants to include up to 60 non-contiguous APAs, or 10% of the total number of APAs in the State, in each submitted Funding Application. This approach was intended to encourage applicants to propose projects that serve larger areas and to create flexibility to avoid a one-size-fits-all approach for project design and methodology.[18] The IOB balanced this goal with the

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[15] IPV2 Section 5.1 (2.4.1). IOB requested minor changes to this IPV2 Section from its FPO and those changes were approved. These changes eliminated the requirement to publish a "budget" for each APA and provided more flexibility to cluster APAs in Tribal areas. These changes were posted to Link UP Idaho.

[16] BEAD APA Methodology (March 2025) https://linkup.idaho.gov/wp-content/uploads/2025/03/APA-Methodology-2.0.pdf

[17] BEAD Application Project Areas 4.0, https://experience.arcgis.com/experience/3a16e756139948888232570168c86f72/#data_s=id%3AdataSource_1-197b2fb18f6-layer-90-197eab125f7-layer-94%3A460965

[18] The IPV2 Subgrantee Selection Process required applicants to submit a separate application for each APA that it proposed to serve with BEAD funding. However, as IOB updated the design and coverage of each APA to make them smaller and more responsive to individual community needs, it became apparent that the requirement to submit an application for each APA to be covered would be overwhelming for applicants and for the IOB review team. The IOB submitted a formal request for a revision to its IPV2 to allow applicants to

compressed timeframe and supported efficient and thorough application review by limiting the number of APAs allowed in one application to 60.

To provide the IOB review team with a more granular and detailed look at each application, the IOB application materials required applicants to break down the total number of BSLs and total project funding requests by each APA included in the application. This allowed the IOB team to more closely review the impact of each proposed project on a specific APA and to compare competing applications more directly.

Removal of BSLs

The IOB's preliminary application design would have allowed applicants to exclude no more than 5% of BSLs in each APA it proposed to serve.[19] The RPN required that states allow applicants "to propose to exclude select broadband serviceable locations that the applicant determines are excessively high-cost locations from the project area (or would otherwise make the project economically unviable for the technology being used)."[20] Additional NTIA guidance prohibited states from requiring applicants to include any specific BSL in their funding proposals.[21]

The IOB updated its final application materials to comply with the RPN and the NTIA guidance. This BSL exclusion process gave applicants additional flexibility in their project designs and encouraged applications in harder-to-serve areas.

The IOB's application materials also allowed applicants to propose to exclude eligible BSLs using NTIA Reason codes 1–5, subject to further review by the IOB.[22]

The IOB required applicants to specifically identify the excluded BSLs in each covered APA and requested that applicants provide justification to support their claims of high cost and lack of economic viability by submitting a narrative and documentation. This approach was critical to identifying excluded BSLs during deconfliction and negotiation

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include multiple non-contiguous APAs in each submitted application. IOB received approval of its IPV2 update on March 19.

[19] The approved IPV2 required applicants to submit proposed projects that served all eligible BSLs in each APA they proposed to serve. IPV2 Section 2.4.1, 5.8; Section 2.4.6. IOB was working with NTIA to update its application materials when NTIA released the RPN that required Eligible Entities to allow BSL exclusions.
[20] RPN Section 3.3.
[21] NTIA Frequently Asked Questions 3.21.
[22] Idaho Funding Application Outline and Instructions (July 2025) at p. 8-9. IOB also gave applicants the option to propose to exclude BSLs pursuant to an NTIA mapping Reason Code, which IOB will review and may deny and require the applicant to serve.

and supporting the IOB's continuing obligation to distribute the BEAD Program funding with the intent to serve all eligible locations.

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.

The IOB followed its IPV2 and adhered to the RPN to conduct a fair, open, and competitive Subgrantee Selection Process through a multi-phase approach. During each step in the process, the IOB put the necessary protections in place to maintain the integrity of the competitive process. The IOB implemented protections against collusion, bias, subjectivity, conflicts of interest, and other factors that may undermine confidence in the process.

As a result, the IOB received applications from a large applicant pool requesting funding for projects employing several different technologies.

Steps to a Fair Process

The IOB implemented policies designed to ensure fairness by setting forth clear, reasonable, and program-specific gating and award criteria. This effort allowed a variety of entities to participate, from small, local community providers to nationwide and regional providers. This process also ensured that applicants proposing a variety of technologies, business models, and ownership structures were encouraged to participate. The IOB built flexibility into its application process by designing the APAs to support projects of different sizes, allowing BSL exclusions, and allowing multiple non-contiguous APAs within a single application.

The IOB developed an application review and scoring process that was transparent, objective, systematic, grounded in data, and consistent with BEAD Program rules. More detail on this process is described below. To ensure all applicants had access to the same resources and information, the IOB maintained a robust email distribution list and published all application materials, two application guides, and many other technical resources to support applicants on the Link Up Idaho website.[23]

The IPV2 explicitly addressed concerns regarding collusion and conflicts of interest among applicants. For example, the IOB committed that it would "disqualify an

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[23] https://linkup.idaho.gov/beadsubgrantee/

application if an applicant or their representative attempts to improperly influence the grant process or collude in any way."[24]

Steps to an Open Process

The IOB developed a process that is open, inclusive, and transparent, allowing all qualified entities to apply for the BEAD Program funding. Under the BEAD statutory mandate,[25] the IOB encouraged a variety of different types of entities to apply.[26]

The following entities were eligible to apply:

Eligible Broadband Providers	Incorporated Businesses or Partnerships	Non-profit Organizations	Limited Liability Companies
Corporations	Cooperative Entities	Idaho Local and Tribal Governments	Non-Traditional Providers

Idaho statute defines "eligible broadband providers" at §40-517, Idaho Code. The IPV2 specified that cooperative entities must currently offer broadband to participate. The IPV2 also encouraged "non-traditional providers" to apply, such as utility districts and other types of cooperatives.

To promote broad participation among applicants, the IOB ensured that application documents, relevant resources, background information, and guidance for both the Prequalification and Funding Application phases were made widely accessible. These materials were distributed through a variety of channels,[27] including posting on the Link Up Idaho website, emails to stakeholders, and open office hours. The IPV2 pledged to provide extensive communication, technical assistance, and administrative support to applicants throughout the process.[28]

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[24] IPV2 Section 2.4.1
[25] 47 USC §1702(h)(1)(A)(iii).
[26] IPV2 Section 3.2 (Section 2.4.1)
[27] IPV2 Section 2.4.1
[28] IPV2 Section 2.4.1

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Even under the truncated timeframes of the RPN and during two rounds of accepting funding applications, the IOB fully implemented its pledged applicant support, including the following:

- Creating a comprehensive email list of interested stakeholders, plus targeted lists for outreach and notices on specific issues;
- Developing comprehensive Application Guides for both Prequalification and Funding Applications;
- Standing up a robust electronic grant portal with clear navigation guidance;
- Posting all application materials on the Link Up Idaho website in a centralized location and in a timely manner, including all required templates, application questions, application guides, fact sheets, FAQ documents, and scoring rubric;
- Posting key NTIA guidance materials;
- Posting and updating the BEAD Program Timeline;
- Posting all maps and challenge process materials on the Link Up Idaho website with guides, explanations, and downloadable spreadsheets. This included allowing public comments on each APA map iteration and taking those comments into account when finalizing the map data;
- Hosting multiple live webinars through office hours with presentations and the opportunity for direct, live Q&A; posting any presentation slides on the Link Up Idaho website;
- Providing one-on-one technical assistance, as needed;
- Developing a comprehensive FAQ process that published questions from several of the outreach events and added additional questions as updates to guidance and information;
- Posting a list of all Prequalified applicants; and
- Posting a map and summary of each application received for the BEAD Program.

Idaho's strong tradition of open government supported a transparent process. The IPV2 includes a clear and comprehensive presentation of Idaho Public Records Law and applies the requirements of that law to the BEAD Program.[29] Applicants were told to expect that their application materials would be treated as a public record and made

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[29] IPV2 Section 2.4.1, Idaho Public Records Law, Title 74, Idaho Code.

available to the public upon request unless the applicant specifically identified application material as confidential or proprietary and provided justification for the request. The IOB's application of its Public Records Law balanced the interest of open government with the protection of key confidential information to encourage the applicant to provide detailed and robust application information.

The IOB posted application summaries on the Link Up Idaho website at the same time it posted the Final Proposal, to further create an open and transparent process.[30]

Steps to a Competitive Process

The IPV2 outlined a series of program criteria intended to increase the number of applicants while ensuring fairness through various measures. For example, the IPV2 set a clear and transparent process for reviewing competing applications within the same project area.[31] To encourage competition among a variety of applicants, the IOB further confirmed in the IPV2 that there are no laws in Idaho concerning broadband projects that hinder the participation of public sector entities or impose any other restrictions on eligible applicants.[32]

The IOB fully implemented the RPN to ensure that all applications were reviewed on a technology-neutral basis, with no element of the program designed to favor a single type of technology over others.

Additionally, the IOB requested and received approval from the NTIA to hold a second Funding Application round to accept applications for APAs that received only a single application during the first round of the Funding Application Phase. Eligible APAs in this second round included many rural and hard-to-serve areas. This second round was intended to increase competition by providing all prequalified applicants with additional time to submit proposed projects.

As described in more detail below, the IOB Scoring Rubric and application materials encouraged applicants to be competitive and provide comprehensive project details that allowed the IOB to fairly and comprehensively score and analyze application responses and gating criteria.

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[30] IPV2 Section 5.6 (Section 2.4.1)
[31] IPV2 Section 2.4.2, 2.4.7
[32] IPV2 Section 2.15.1.

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Description of the Process to Ensure Reviewers Were Trained, Qualified, and Objective

Idaho state law gives discretion to the IBAB to direct the IOB to bring on an independent third party to review and score the BEAD Program funding applications and to provide recommendations to the IBAB for their review and approval.[33] The IBAB directed the IOB to structure its BEAD Subgrantee Selection Process so that an independent third-party team reviewed all Prequalification and Funding Applications.

Pursuant to this authority, the IOB retained a national engineering design consulting firm to support the design and administration of its BEAD Program and to lead the application review process. With more than 20 years of experience supporting national, state, regional, and local broadband projects, the independent third-party review team was led by five highly skilled professionals with extensive financial, technical, and policy experience. With over 4,000 employees, the review team could pull from groups within the consulting firm that specialize in the different areas required for a thorough review of the Prequalification and Funding application materials.

The third-party review team consisted of 25 reviewers:

- Five leadership team members;
- Financial reviewers, each with decades of experience in financial planning and reviewing financial statements, business plans, pro forma analysis, and other relevant financial data;
- GIS and data reviewers with extensive data analysis and GIS mapping experience;
- Completeness reviewers who are experienced program analysts, public engagement specialists, and GIS specialists with familiarity and knowledge of the BEAD Program. Several reviewers helped to prepare the IOB BEAD Program documents, such as the Five-Year Action Plan and Initial Proposal Volumes 1 and 2; and
- Eleven technical reviewers with a wide variety of experience in civil engineering, public infrastructure, telecommunications network technology, wireless standards and protocols, and satellite technology.

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[33] See, Idaho Legislature, House Bill No. 299 (Ways and Means Committee, signed March 19, 2025) (amending 67-4761 Idaho Code), https://legislature.idaho.gov/wp-content/uploads/sessioninfo/2025/legislation/H0299.pdf.

5 Leadership Team Members	2 Financial Reviewers	2 GIS and Data Reviewers
5 Completeness Reviewers	11 Technical Reviewers	

To ensure a thorough and consistent evaluation of the application components, the leadership team, with direct experience in broadband infrastructure and grant program design, created:

- Consistent, accurate reviewer records in real-time with a tracking dashboard and an application review interface using Survey123 to support consistency among the reviewers and to allow the team to more closely track application review progress.
- Three targeted training sessions for reviewers and a compilation of key reference materials to bridge knowledge gaps and align understanding across all reviewers. These training courses supported engineers in adjacent fields with specific technical and evaluation criteria relevant to broadband infrastructure projects. Topics included fiber-optic network architecture, middle-mile and last-mile deployment considerations, and industry standards for scalability and reliability. The trainings also allowed both engineering and financial reviewers to competently assess the feasibility, design integrity, and implementation plans of broadband proposals, thereby supporting a rigorous and informed review process.
- Multiple trainings on BEAD Program rules and the IOB's application review and scoring procedures. This training emphasized the importance of objectivity, consistency, and fairness in the application reviews.
- An application review guide that provided a comprehensive resource that facilitated the reviews and ensured consistency and attention to detail. The reviewer guide emphasized the IOB's obligation to ensure that adequate safeguards are in place to protect the integrity of the competition

and the importance and obligation of each reviewer to complete the process thoroughly, consistently, and accurately.

- Open channels of communication among the reviewers throughout the application review process. These communications included regular meetings of the review teams, as well as on an ad hoc basis, throughout the application review process to address any questions about the applications and ensure consistency in the review.

Reviewer Conflict of Interest

The IPV2 acknowledges that a conflict of interest, or the appearance of a conflict, may occur if a reviewer is directly or indirectly involved with an organization that has submitted a grant application for evaluation.[34] The IOB put specific steps in place to prevent conflict of interest among reviewers. Reviewers were prohibited from establishing the appearance of bias or unfair advantage with any potential applicant, agency subcontractor, or stakeholder, whether through direct association, indirect associations, or through recreational activities with the representatives from these entities. The IPV2 also provided concrete examples of bias and conflict of interest to further educate reviewers.

Reviewers were directed to inform the IOB of any potential conflicts of interest and to notify the IOB immediately if any conflict arises during the review process. The IOB also informed reviewers that they must be financially independent of any applicant and verify that they have no employment, contractor, or other business relationship with any applicant or subsidiary of an applicant. The IOB made it clear that it will remove a reviewer who is found to have violated these rules and will disqualify an application if applicants attempt to influence the grant process improperly.

Review Committee or Final Approval by a Governing Body

As previously detailed, the IOB works directly with the IBAB, which oversees the State's broadband goals, objectives, and strategic plan. The Idaho Legislature created the IBAB in 2021 via the passage of House Bill 127.[35] The IBAB consists of nine members: three members from the Idaho House of Representatives, three from the Idaho Senate, and three appointed by the Governor.

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[34] IPV2 Section 5.7.1
[35] Idaho Legislature, House Bill 127 (Signed March 23, 2021) (establishing Section 67-4761, Idaho Code) https://legislature.idaho.gov/sessioninfo/2021/legislation/H0127/

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The IBAB established the Idaho Broadband Strategic Plan,[36] which supports the Board's vision that all Idahoans have access to affordable and reliable high-speed broadband. The IBAB holds no fewer than four meetings in a calendar year[37] and may hold special meetings with proper notice and compliance with open meeting laws/requirements.

The partnership and collaboration between the State's executive and legislative branches are key to the State's broadband success. With a focus on accountability to Idahoans, the IBAB plays a critical role in Idaho's overall, statewide broadband processes and programs.

As required by Idaho statute,[38] the IBAB must review and approve the IOB's recommendations for the design of any broadband grant program that comes under the Idaho Department of Commerce. The Board also approves the IOB's recommendations for the distribution of broadband grant funding. As discussed above, the Idaho Legislature provided the opportunity for the IBAB and IOB to work with a third-party review team to evaluate and review applications, leading to formal recommendations for funding.[39] The IBAB reviewed and approved the Final Proposal and the list of provisional awards, while recognizing that the IOB Final Proposal and provisional awards will be subject to the NTIA review.

The IBAB has been an active and engaged body as it works with the IOB to support the State's broadband policy goals through the BEAD Program.

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.

As discussed above, the IOB maintained a clear and consistent process to encourage applications for every APA in the State, including the addition of a second round of accepting funding applications. The IOB affirms that it followed a procedure consistent

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[36] Idaho Broadband Strategic Plan (2022-2027), https://commerce.idaho.gov/content/uploads/2022/06/Idaho-Broadband-Advisory-Board-Idaho-Broadband-Plan-Final-Version_.pdf

[37] IBAB Bylaws, https://commerce.idaho.gov/content/uploads/2023/01/Idaho-Broadband-Advisory-Board-By-Laws-12-21-2021.pdf

[38] Idaho Legislature, House Bill 127 (Signed March 23, 2021) (establishing Section 67-4761, Idaho Code) https://legislature.idaho.gov/sessioninfo/2021/legislation/H0127/

[39] See, Idaho Legislature, House Bill No. 299 (Ways and Means Committee, signed March 19, 2025) (amending 67-4761 Idaho Code), https://legislature.idaho.gov/wp-content/uploads/sessioninfo/2025/legislation/H0299.pdf

with the process approved in its IPV2 to address APAs that did not receive an application.

The IPV2 describes strategies to encourage applications in APAs that received little participation during the initial funding window.[40] The IOB considered a full or partial waiver of the 25% matching requirement when requested by an applicant and considered an expanded definition of "excessive costs" to support Priority Projects in these hard-to-serve areas. The IPV2 also allows the IOB to provide similar incentive mechanisms to Non-Priority broadband service in the absence of a Priority Project.

The IOB also stated that it would encourage applications for these areas by undertaking negotiations with one or more applicants who have applied for adjacent areas to determine the interest of that applicant to serve the neighboring areas and how that would impact the total project cost.[41] The IOB reserved the discretion to determine which of these strategies to employ.

It should be noted that the IOB received LEO applications proposing to serve every APA, but not every BSL, in Idaho during its Funding Application Phase. In many APAs, these LEO applications competed with at least one, and in some cases, multiple Priority Projects and other Non-Priority Projects using fiber or fixed wireless technologies. In a significant number of APAs, however, LEO was the only technology being proposed to serve the APA.

The IOB held a second round of funding to formally attract applications for these APAs with limited competitive options. To accommodate the shortened timeline, the window was open for seven days, and the IOB review team worked diligently to complete its review, scoring, and deconfliction in less than two weeks.

Although the IOB had an approved process in place for no-bid locations or APAs with little participation or competition, including the addition of a second round of funding, the compressed timeframe under the RPN necessitated revisions to the timeframes and the order of events discussed in the IPV2. More information on scoring and deconfliction is included below.

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[40] IPV2 Section 2.4.7
[41] IPV2 Section 2.4.7

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.

During the Idaho initial Challenge Process, the IOB developed its eligible CAI list with a focus on CAIs that met the statutory definition while also meeting the NTIA BEAD NOFO requirements. The IOB tailored its list to apply the categories CAIs to the appropriate organizations, including a definition of community support organizations that are only housed in a government-owned facility, to ensure the broadest public benefit for its BEAD funding. The IOB received approval of this list from the NTIA and posted this list on its website with the completion of its Challenge Process. Upon release of the RPN and further NTIA guidance, the IOB reviewed its list of approved CAI locations and confirmed that no further updates were necessary.

1.5 Question (Y/N): Certify that 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 (Requirement 3)

3.1 Text Box: Has the Eligible Entity taken measures to: (a) ensure that each subgrantee 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 that 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.

The IOB has taken several measures to ensure that each BEAD subgrantee will begin to provide services to customers desiring broadband service within the project area no later than four years after the date on which the Subgrantee Agreement is signed and fully executed.

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During the Subgrantee Selection Process, the IOB's application and resource materials made clear that projects must be completed in no more than four years from finalizing the subgrant agreement. Applicants were required to certify their understanding and ability to comply with all BEAD Program rules, including the requirement to complete the project in no more than four years from execution of the Subgrantee Agreement. The IOB's Scoring Rubric also encouraged applicants to propose an efficient deployment timeline by assigning points for commitments to complete deployment in less than four years.

Applicants were required to submit a Project Deployment Timeline specific to the proposed project that specified the number of months it would take to complete each key deployment milestone for the period of performance. The IOB review team appraised these timeline submissions and compared them to other elements of an application to determine whether the project was technically and operationally feasible in the timeline proposed by the applicant.

After the NTIA's approval of the IOB's Final Proposal and finalization of its provisionally awarded projects, the IOB will create subgrantee agreements for each formally awarded project. These subgrant agreements will follow the NTIA guidance and explicitly hold subgrantees accountable for the committed project deployment timeline by:

- Specifying the dates of the subgrantee's period of performance.
- Specifying key project milestones that will provide the framework and triggers for reimbursements, monitoring, and penalty provisions.
- Imposing technical, financial, and performance closeout requirements, including performance testing and documentation of the completed project design that will also demonstrate the applicant's ability to serve customers within 10 business days of a request for service.
- Requiring applicants to complete the closeout process before distribution of the final grant fund payments and pursuant to the IOB grant agreement with the NTIA, in accordance with 2 C.F.R. §200.344.
- Imposing penalties for failure to comply with the subgrantee's committed deployment timeline and related grant obligations. These penalties can include withholding reimbursements, delaying final payments, and claw-back provisions requiring subgrantees to return distributed grant amounts.

The IOB acknowledges that subgrantees deploying LEO technology will have different timelines and milestones during their period of performance compared to subgrantees

deploying other technologies.[48] The IOB will tailor its subgrantee agreement to ensure compliance with these unique obligations for LEO subgrantees.

The IOB will also develop a detailed compliance and monitoring process, as further described under **Requirement 4 (Oversight and Accountability Processes)**. Through regular reporting by the subgrantee, site visits, desk reviews, audits, and other compliance methods, the IOB will track the progress of each awarded project. The IOB will proactively reach out to applicants that may fall behind, so that it can work with these applicants to close out the project within the committed timeframe, and no later than 120 days prior to the end of the IOB's period of performance for its grant agreement with the NTIA.

4   Oversight and Accountability Processes (Requirement 4)

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 Idaho Legislature has a well-publicized task force and web portal where the public can report instances of waste, fraud, and inefficiencies within state government: https://legislature.idaho.gov/sessioninfo/2025/interim/doge/.

Idaho also has a specific portal and hotline for state government employees to report instances of fraud, waste, and abuse in state government, https://dhr.idaho.gov/employeecomplaintline/ or (800) 554-5627.

4.2   Attachments: Upload the following two required documents:

(1) BEAD program 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 if 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.

See Attachments

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

Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;

b. Compliance with 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 the Eligible Entity's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the Eligible Entity's BEAD award;

d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;

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 subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. This includes an acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer; and

g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance is consistently assessed and tracked over time.

Yes.

5   Local Coordination (Requirement 5)

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.

On hold for Public Comment

6   Challenge Process Result (Requirement 6)

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.

The final location classifications were posted at https://linkup.idaho.gov/beadsubgrantee/ on July 25, 2025.

7   Unserved and Underserved Locations (Requirement 7)

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 upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2).

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.

N/A

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.

N/A

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 upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2).

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.

N/A

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.

N/A

7.7   Question (Y/N): Certify that 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 utilize 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 Challenge Process list through a BEAD project. The documentation for each location must be relevant for the specific reason 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 (Requirement 11)

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.

The IOB continues to be steadfast in its commitment to reducing the costs and barriers that often impede deployment efforts. In the Initial Proposal,[42] the IOB stated that it was pursuing specific mitigation strategies to reduce those costs and barriers, including crafting plans to work with its agency partners, local governments, and industry stakeholders to promote these efforts:

- **Promoting the use of existing infrastructure** by implementing and prioritizing the goals laid out in the IBAB Strategic Plan regarding existing middle-mile and last-mile facilities.
- **Promoting and adopting Dig-Once policies** through coordination of grant program projects that support Dig-Once policies and by informing and educating stakeholders on these practices, including the applicability of the Idaho Broadband Dig-Once and Right-of-Way Act.[43]
- **Streamlining state and local permitting processes** through outreach and collaboration with local governments and distribution of education and

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[42] IPV2 Section 2.10 Cost and Barrier Reduction (Requirement 14)
[43] Sections 40-515 thru 40-520, Idaho Code

program materials on best practices and the applicability of the Red Tape Reduction Act.[44]

- **Improving cross-jurisdictional communication** by providing information to stakeholders regarding the organizational charts of relevant agencies, process flow-charts, and standard timelines for permitting and access to local assets
- **Streamlining cost-effective access to poles** through collaboration with the Idaho Public Utility Commission and regulated utility companies to create information and resources on pole-attachment policies and agreements.

The IOB's work to implement these mitigation strategies is **In Progress.**

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.

N/A

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.

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[44] Idaho Executive Order 2019-02, Red Tape Reduction Act.

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.

N/A

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 ensured planned for the reliability and resilience of BEAD-funded networks in their network designs, explain why the Eligible Entity was unable to do so.

N/A

12 Substantiation of Priority Broadband Projects (Requirement 12)

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.

The IOB employed a performance-based and technology-neutral analysis – aligned with the NTIA's June 6, 2025, RPN and the Infrastructure Act – for evaluating and classifying projects as Priority Projects. The IOB applied this methodology consistently across all applications.

In compliance with the RPN and the statutory definition, a BEAD Program Priority Project must:

- Provide service of at least 100 Mbps download / 20 Mbps upload;
- Achieve latency of 100 milliseconds (ms) or less; and
- Be easily scalable to support evolving demands like 5G, successor wireless technologies, and other advanced services.

Applicants were asked to indicate whether their proposals qualified as Priority Projects. The IOB, through its third-party consultant review team, conducted its own rigorous evaluation to make an independent determination of the project's priority status. The

information provided by applicants and evaluated by the review team is outlined in detail below.

Technical and Documentation Requirements for BEAD Subgrantee Applications

The IOB required comprehensive technical and design documentation from all BEAD subgrantee applicants to thoroughly assess each project's scope, feasibility, and alignment with BEAD Program goals and evaluate whether the project qualified as a Priority Project. The applicant's technical capability and the technical feasibility of the project design, as well as long-term sustainability and scalability of the proposed network, were considered.

Key Documentation and Requirements

Applicants were required to complete narrative responses and numerical fields in the BEAD Application and upload supporting documents using IOB-provided templates. These responses applied to all technology types unless otherwise noted. The IOB review team relied on the following core documents and data to conduct its Priority/Non-Priority analysis:

1. **Project Workplan**
   - **Committed speeds and latency**
   - **Operational capability**
   - **Narrative descriptions of network design, scalability, and construction planning**
2. **Technical Network Documentation**
   - **Project Area and Network Route Diagram** (geospatial format, including infrastructure routes and backhaul)
   - **Logical Network Drawing** (showing architecture, hardware, and network layers)
   - **Scalability Documentation** (future upgrade plans, capacity forecasts, middle-mile/backhaul sufficiency)
   - **Network Resiliency and Outage Management Plans**
3. **Engineering Certification**
   - **Professional Engineer Certification** verifying that the network will meet the BEAD Program performance standards.
4. **Technology-Specific Requirements**
   - Additional technical details tailored to the project's deployment type:
     - **Fiber-to-the-Premises**: Fiber strand count, deployment method.

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- **Fixed Wireless**: Tower details, spectrum use, capacity planning, interference mitigation.
- **Coaxial Cable / HFC**: DOCSIS versions, deployment mix (aerial vs. buried).
- **LEO Satellite**: Reserved capacity, equipment, latency mitigation.

Evaluation Use

The IOB review team used the submitted documentation to first determine project eligibility and then to assess the speed, latency, and scalability of the proposed network to support the Priority/Non-Priority designation.

Evaluation Methodology

The IOB consistently applied the RPN requirements across all qualified applications, on a per APA basis, when determining the Priority/Non-Priority status of the project. The IOB review team evaluated each application on the basis of technology neutrality and technical merit (speed, latency, scalability, verified via expert review).

All Technologies – Minimum Standards Review

The IOB review team first considered whether the project was technically capable of meeting the minimum BEAD performance standards by the end of the period of performance. Additionally, the review team considered whether each application included the required evidence, discussion, and technical information to determine a project's classification as Priority or Non-Priority Project (see also discussion above for **Requirement 1 (Subgrantee Selection Process Outcomes)**).

Only projects that satisfied the minimum BEAD requirements and that provided the necessary information to gauge scalability were moved forward for an APA-level scalability analysis. Projects that could *not* meet the minimum performance standards were disqualified from further consideration. Projects that *did* meet the minimum BEAD performance standards but that *did not* provide sufficient information for the review team to conduct a scalability analysis were considered Non-Priority.[45]

All Technologies – Scalability Analysis

The IOB review team analyzed the level of scalability – the ability of a project to easily scale speeds over time to meet evolving demands like 5G, successor wireless

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[45] See, NTIA BEAD FAQ v. 15, Q. 3.35.

technologies, and other advanced services – for those projects that moved forward from the completeness and minimum standards review.

For all technologies proposed (fiber, fixed wireless, and LEO satellite), this review included the applicants':

- Committed speeds for its project within six to eight years after the application was submitted. The IOB review team considered speeds of over 1 Gbps symmetrical within the next six to eight years as a minimum standard to meet the RPN's scalability requirements;
- Narrative discussions regarding plans and commitment to scalability and long-term performance;
- Plans for equipment deployment and implementation of protocols and standards;
- Plans for equipment and protocol upgrades;
- Description of the reliability of the network and outage plans; and
- The amount and types of middle-mile and backhaul facilities to support long-term scalability and performance.

Projects were considered Non-Priority where the IOB review team's experts determined, through the submitted evidence, that the applicant did not provide an adequate showing to meet the RPN's requirements and did not demonstrate its commitment, technical capability, and likelihood of success for the scalability of the project on an APA basis.

Fixed Wireless and LEO Satellite Specific Reviews

The IOB review team conducted technology-specific analyses for proposed projects deploying fixed wireless and LEO technologies.

Fixed Wireless

The IOB review team assessed fixed wireless applications using application narratives, the submission of a specific Fixed Wireless Technology spreadsheet that collected pertinent engineering design data, and files indicating signal strength in propagation maps. These narratives and data were used to determine the viability of the project and its Priority/Non-Priority status.

The IOB review team included an assessment of:

- The viability of backhaul links to provide scalable service levels for the proposed towers and hubs;

- The ability to upgrade and expand capacity for these backhaul links to meet forecasted future demand with multi-gig capacity and low-latency performance;
- The deployment of licensed fixed wireless in areas with higher density to support scalability and reliable performance over a longer period of time;
- The type of equipment and the proposed use of the latest beamforming technologies, including plans to use modern radios that support scalability;
- Design data regarding base station capacity, transmitter information, and "link budgets" (the amount of time the communication link will be operational and available for use, including signal strength and power loss);
- The placement of existing towers and network routes and plans for future buildout as described by propagation maps and diagrams relative to the location of eligible BSLs that the applicant proposes to serve and any terrain or topography that may impact performance;
- Plans to add more towers, small cells/microcells, or additional capacity through long-term leases to support long-term forecasted improvements and scalability; and
- Plans to own fiber backhaul facilities as well as strong partnerships with fiber providers to receive dedicated backhaul.

Applications that did not fulfill the engineering criteria for these assessment items were classified as Non-Priority.

Low-Earth Orbit

The IOB review team closely reviewed technical assumptions and commitments made by LEO providers in their applications, including stated per-satellite throughput and inter-satellite link performance in a fully loaded, commercial environment, as well as the applicants' claims of the performance of the reserved capacity for each served location.

The IOB review team considered a weighted combination of four key factors when evaluating LEO service in each APA: BSL density, average slope, tree canopy/foliage density, and precipitation rate. The IOB review team assessed the impact on both uplink and downlink performance.

Each of these factors was charted using a zonal statistical analysis and a weighted rating system. The team used this analysis to identify and make recommendations regarding areas of the state where LEO service may experience greater reliability challenges from blocked or weakened signals. The IOB then determined the total

reliability risk levels that justified a closer review when determining priority broadband projects and when comparing LEO with competing projects in a specific APA.

Density: The weighted density of two datasets was calculated: all BSLs within an APA and BEAD-eligible BSLs within an APA. The weighted density of all BSLs within an APA is used in the risk assessment since LEO service will be available to all households within the APA and not just BEAD-eligible households. The analysis then grouped nearby locations into clusters. The analysis used general recommendations from multiple Institute of Electrical and Electronics Engineers (IEEE) research papers on LEO beam management algorithms to identify density ranges that impact performance. The IOB review team categorized the density levels ranging from very high to ultra-low.

Slope: Terrain slope influences sky visibility and the reliability of service in certain areas. The average slope was measured across each APA and categorized on a scale from low slope to extreme slope, with increasing steepness and the presence of steep, rugged terrain associated with greater risk of service disruption. This assessment methodology quantifies the relationship between terrain slope and satellite communication viability through established engineering principles and empirical data analysis.

Tree Canopy and Foliage Density: Vegetation plays a significant role in broadband performance, as dense tree cover can obstruct several different types of broadband signals and reduce reliability. To evaluate this factor, the average percentage of tree canopy within each APA was considered. The IOB acknowledges that this analysis can result in significant variability when data is considered on a large scale, and given the number of BSLs to compute in an analysis and the timeframe dictated by the RPN, certain assumptions were made to accommodate these limitations.

Rain Intensity Rate: Severe weather, particularly heavy precipitation, can affect the reliability of LEO satellite service. To assess this risk, historical precipitation rates were evaluated in each service area, focusing on the intensity and frequency of precipitation events. The review team used National Oceanic and Atmospheric Agency data and calculated risk levels using the ITU-R models to predict rain attenuation.

Risk Level Analysis: The IOB determined appropriate weighting assignments for each of the factors for a reliability risk assessment. The IOB review team then applied these weighting factors to determine a reliability risk level for each of the APAs and identified APAs where there were elevated risks to broadband service delivery. These results were considered during scoring and deconfliction.

13 Subgrantee Selection Certification (Requirement 13)

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.

The IBAB approved a new scoring matrix that aligns with the RPN and applies to all types of technologies on June 30, 2025. The scoring matrix outlined primary and secondary scoring criteria, with the secondary scoring criteria being triggered only if two Priority or two Non-Priority applications have a per BSL cost within 15% of the lowest cost proposal. The primary criterion was the minimal BEAD outlay, with points awarded to the application with the lowest cost per BSL in an APA and all applications for that APA that were within 15% of that cost. The secondary criteria, based on the RPN, included the speed to deployment, network speed, latency, and scalability.

The foundation for application scoring for both the first and second rounds of the Funding Application Phase was the ISP-provided application data. Submitted applications, including all responses and uploaded templates/files, were downloaded and extracted from the State's Salesforce portal after the BEAD Program application window closed. The application data was fed into an application review process that allowed a holistic, global view of all applications and responses, permitting the IOB review team to examine several data points from each application, including:

- APA #(s)
- Application ID
- # of BSLs Served
- # of BSLs Excluded
- Funding Request Amount
- Cost per BSL

- Technology Type
- Speed to Deployment
- Download Speed
- Upload Speed
- Latency
- Scalability

Primary Scoring Criterion

The IOB's primary criterion awarded 55 points for the lowest BEAD-funded cost per BSL location in a proposed APA and for other BEAD-funded costs per BSL across the APA within 15% of the lowest per BSL cost. The IOB review team determined the minimal BEAD outlay per APA by dividing the BEAD fund grant request by the proposed total number of eligible locations that the applicant proposed to serve in each specific APA.

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The analysis then compared all applications across each APA, and when there were applications within 15% of the lowest cost per BSL across each APA, the application with the lowest cost per BSL, and those applications with a cost per BSL within 15% were awarded 55 points, and all moved to the secondary round scoring. Applications were not scored if their costs exceeded 15% of the lowest cost per BSL, per APA.

Secondary Scoring Criteria

The secondary scoring criteria were initiated for application reviews when there were projects with costs on a per BSL, per APA, basis within 15% of the lowest cost across each APA. The secondary scores were based on technical reviews of each applicant's responses to the relevant questions. Scores consisted of criteria related to "Speed to Deployment" and "Speed of Network and Other Technical Capabilities" as outlined in the RPN, with the IOB using the IBAB-approved scoring matrix that allotted points for the following:

- **Deployment Schedule Commitment**
    - 5 points: < 24 months
    - 4 points: 24-35 months
    - 3 points: 36-41 months
    - 2 points: 42-47 months
    - 0 points: = 48 months
- **Download Speed**
    - 5 points: >1G
    - 4 points: 700-999 Mbps
    - 3 points: 401-699 Mbps
    - 2 points: 250-400 Mbps
    - 1 point: 101-249 Mbps
- **Upload Speed**
    - 5 points: >1G
    - 4 points: 650-999 Mbps
    - 3 points: 250-649 Mbps
    - 2 points: 100-249 Mbps
    - 1 point: 21-99 Mbps
- **Latency**
    - 5 points: Less than 10 ms
    - 4 points: 10-20 ms
    - 3 points: 21-35 ms
    - 2 points: 36-50 ms

- ▪ 1 point: 51-65 ms
  - **Scalability**
    - ▪ 5 points: >2G/2G
    - ▪ 3 points: 1G/1G
    - ▪ 1 point: 500/500 Mbps

Application Scoring

Scores were assigned to applicants in each APA using the primary, and when appropriate, the secondary scoring criteria based on analysis of the review tool data and relevant questions for applicants. If there were no competing applications or a Priority Project received the highest score across an APA, the application was identified as the "preliminary winner" for that respective APA. Scores for Non-Priority projects were also considered where there was no Priority Project or where deconfliction created excluded BSLs that were unserved, and only a Non-Priority project was available to serve those BSLs.

Additional Analysis of BSL Exclusions, Excessive Cost, and Financial Capability

A further analysis of each of these applications, categorized by Priority and Non-Priority designations as described in **Requirement 12 (Substantiation of Priority Broadband Projects)**, then occurred to review the number of BSLs excluded in each APA, the financial capability and sustainability of the project, and other managerial and technical capability criteria to make a final award determination for each APA.

Financial Sustainability Criteria: During this analysis, the IOB review team relied on its financial review experts to develop and consider financial stability and sustainability risk scores that were based on applicant responses and the submitted project proforma, as well as prior submissions of audited financials, to identify any red flags for the preliminary winners. This was done to ensure the applicant was a viable funding candidate based on financial capabilities. See additional discussion above in response to **Requirement 1 (Subgrantee Selection Process Outcomes)**.

During this point in the review, the IOB review team also considered an applicant's committed deployment timeline in relation to the applicant's proposed budget to ensure that a preliminary winner's proposed budget and match amounts were presented in accordance with its committed deployment timeline, and in such a way that demonstrated that the project would be successfully completed in those timeframes.

BSL Exclusions: The IOB review team considered BSL exclusions when comparing Priority Projects with each other or, where no Priority Project existed, in areas with

multiple Non-Priority Projects. If a lowest-cost project excluded a significant number of BSLs compared to other projects with the same Priority/Non-Priority designation in a specific APA, the IOB review team closely examined the applicant's reasoning and evidence for those BSL exclusions. The review team also considered budgets and BEAD funding requests relative to the number of exclusions. The IOB review team looked at the next project in line to determine if it proposed to serve significantly more BSLs in the APA, and, in some cases, it chose that project, even if it had a lower score.

To support universal service to all Idaho residents, the IOB review team used its discretion to prioritize applications that served 100% of the eligible BSLs pursuant to the RPN.

Excessive Cost: The IOB established an excessive cost threshold of $24,264, pursuant to the requirements of the RPN. The IOB developed this threshold with an analysis of the cost data that the NTIA used to define and identify extremely high-cost census block groups pursuant to its statutory requirement.[46] This NTIA data included costs calculated at the BSL level in Idaho high-cost census blocks for fiber and fixed wireless technologies.

The IOB chose this methodology and the use of the NTIA data because it strictly relies on the cost values that the NTIA independently developed using a thorough and complex set of cost figures, calculations, and assumptions. The IOB understands that the NTIA data considers the levels of remoteness, challenging terrain and topography, and other unique attributes that reflect the challenges Idaho ISPs will face as they deploy projects in these high-cost areas.

To further support its excessive cost methodology, the IOB conducted a high-level analysis comparing the NTIA data with cost data for fiber and fixed wireless applications from round one of its Funding Application Phase. This analysis confirmed that the NTIA data produces a high-cost threshold that is only $1,200 higher than the most recent costs provided by applicants to serve high-cost areas in Idaho, thus confirming the validity and continued relevance of the NTIA high-cost data inputs.

The IOB chose to use the slightly higher NTIA cost figure as its excessive cost threshold to further support projects in high-cost areas in Idaho. This threshold balances the BEAD program objectives to serve all eligible BSLs with the effective and efficient use of public funding investment in broadband throughout Idaho.

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[46] BEAD NOFO; https://broadbandusa.ntia.gov/bead-allocation-methodology

Once the threshold was established, the IOB review team identified project applications with funding requests that exceeded $24,264 per BSL and excluded them from further consideration.

14 Environmental and Historic Preservation (EHP) Documentation (Requirement 14)

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 (ESAPTT) 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), available at

https://www.firstnet.gov/network/environmental-compliance/projects/regionalprogrammatic-environmental-impact-statements.

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 Regional PEIS.

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Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

See Attachment

15 Consent from Tribal Entities (Requirement 15)

15.1 Attachment(s) (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.

A limited number of the IOB's provisionally awarded deployment projects include BSLs that are located on federally recognized Tribal Lands. During its Subgrantee Selection Process, the IOB required all applicants to certify their awareness and understanding of the BEAD Program requirement to submit a Resolution of Consent from each Tribal government for projects on Tribal Land.

Pursuant to NTIA guidance and given the accelerated timelines under the BEAD Restructuring Policy Notice, the IOB has provisionally awarded funding to projects on Tribal Land without a Resolution of Consent. The IOB has directly informed the provisional subgrantees that any awards for projects located on Tribal Land will be subject to the requirement to submit a Resolution of Tribal Consent from the relevant Tribal Governments within six months from the date of approval of the IOB Final Proposal, or the award may be revoked.[47]

The IOB will work with the provisional subgrantees and Tribal governments to obtain the required Tribal Consent Resolution no later than six months after the approval of its Final Proposal by the NTIA.

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[47] NTIA Notice of Programmatic Waiver of deadline for Tribal Consent Resolution (August 2025); NTIA FAQ v.15, Q. 2.41 and 2.42.

16 Prohibition on Excluding Provider Types (Requirement 16)

16.1 Question (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 (Requirement 17)

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 Eligible Entity, note 'Not applicable.'

N/A

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 Eligible Entity does NOT have to upload waiver documentation again.

The IOB has made a small number of provisional awards to applicants that have requested either a full or partial match waiver pursuant to the BEAD Program rules. Following NTIA guidance on match waivers, the IOB has made these awards subject to IBAB and NTIA acknowledgement and approval of the requested match waivers.

The IOB application materials informed applicants that any match waiver request will have to be approved by the IBAB and the NTIA. Applicants have been further informed that if a match waiver request is not approved, the applicant is obligated to commit to the full matching fund required amounts.