

IDAHO BEAD SUBGRANTEE FREQUENTLY ASKED QUESTIONS |

Post-Award Change Special Bidding Round

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IDAHO DEPARTMENT OF COMMERCE |
Office of Broadband



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FAQ Document Overview

The Idaho Office of Broadband (IOB) will regularly post an updated Frequently Asked Questions (FAQs) document throughout the Post-Award Change Special Bidding Round (PAC Bidding Round) process. The cover will include the date the document is posted to the Link Up Idaho website. The document sections will reflect the PAC Bidding Round topics and/or other common topics. The new or updated questions will appear at the top of each section and will be noted as:

- **New!** Or
- **Updated**

If you have questions about the PAC Bidding Round process that are not currently addressed in the FAQs, you may email IdahoBEAD@mbakerintl.com. Both the question and answer will be added to the next iteration of the FAQs.

Idaho BEAD Post-Award Change Special Bidding Round Questions

Eligible Broadband Serviceable Locations (BSLs) and FCC Fabric Data

1. **Question: Which version of the FCC Fabric was used to develop the current list of eligible BSLs?**

Answer: The eligible BSL list used for the PAC Bidding Round is based on FCC Fabric Version 4, consistent with the original BEAD application process. However, Idaho has also used more recent FCC Broadband Map data when identifying BSLs associated with Reason Code 3 and Reason Code 5 designations.

2. **Question: What are Reason Code 3 and Reason Code 5 BSLs, and should applicants include them in their proposals?**

Answer: Reason Code 3 and Reason Code 5 designations in the PAC Rebidding APA BSL Template reflect the most recent FCC reporting regarding the status of those locations in the FCC National Broadband Map and FCC Fabric. *The treatment of these locations within the FCC National Broadband Map and FCC Fabric is not the final determination of eligibility under the Idaho BEAD Program.* NTIA gives states discretion to keep these BSLs in their projects and requires states to serve all eligible BSLs within the BEAD program.

Regarding Reason Code 3

NTIA has clarified that BSLs with Reason Code 3 must be removed **unless**:

1. There is evidence that the BSL is eligible and should not be removed; and/or
2. removing the Reason Code 3 BSL(s) would make the project unviable.

IOB is conducting its own independent review of these Reason Code 3 BSLs to determine if they can remain on the list as an eligible BSL. As part of this process, applicants must provide any evidence developed as part of their network planning and project design that supports the continued eligibility of these BSLs and their importance to the project's financial and technical viability.

See also the link to NTIA's *Reason Code primer*, which states: "*Reason Code 3 must be used unless a location was already served, or the Eligible Entity [the State] determines, with evidence, that the location is likely to use mass-market*

broadband service regardless of FCC's removal from the fabric.": [Using BEAD Non-Service Reason Codes During the Period of Performance](#)

Regarding Reason Code 5

Those BSLs identified as Reason Code 5 will be considered for removal **only where:**

1. the provider claiming to serve these BSLs has notified IOB directly and provided evidence to IOB that the BSLs are receiving BEAD qualifying service (a simple attestation of service will not be sufficient evidence); **and**
2. applicant agrees that the proposed project will remain technically and economically viable even after removing the Reason Code 5 BSL(s).

Therefore, IOB recommends that bidders not remove a BSL solely because it is identified as Reason Code 5 from any project for which they are preparing a bid.

NTIA further clarifies that: *"Consistent with the Using BEAD Non-Service Reason Codes During the Period of Performance primer, Eligible Entities [the State] must balance the need to account for BEAD-eligible locations that do not require program support with the need to maintain project viability."* [BEAD Frequently Asked Questions and Answers \(FAQs\) Version 23](#) (Section 9).

Next Steps:

Based on the firm guidance above, applicants should design their projects for the PAC Bidding Round with the understanding that:

- a **Reason Code 3** BSL will be removed unless there is evidence and justification, as gathered by IOB and the applicant, to support keeping it in the project;
- a **Reason Code 5** BSL will remain in the BEAD-eligible BSL pool and should remain in a project.

IOB will work with applicants to support the technical and financial viability of the projects submitted during this round pursuant to NTIA guidance. IOB will award funding to serve as many eligible BSLs as possible during this PAC Bidding round.

3. Question: What if an applicant needs to exclude BSLs for reasons other than a Reason Code designation?

- Answer: Applicants may propose to exclude BSLs from their bid(s) for reasons other than the current designation as Reason Code 3 and 5. Similar to the original Subgrantee Selection process, an applicant may determine that a BSL

in the APA is too high cost to serve or has identified additional BSLs that may be ineligible for funding (e.g., it is a rock or a service building). For these types of exclusions, applicants will use the APA BSL Template to mark each BSL. Applicants will also identify the number of exclusions and provide a narrative explanation in the Phase 1 Survey 123 application. IOB will review these exclusions and work with winning bidders to gather more information if needed and to support the applicant's project integrity and viability.

4. Question: Some APAs show less than 100% availability. Why?

Answer: In some cases, a small number of BSLs within an APA may already be assigned to another provider through a previous award. Locations may also have been removed from an APA during the Subgrantee Selection process as ineligible BSLs using NTIA Reason Codes. As a result, an APA may appear as 97%, 98%, or 99% of the locations open for bidding with only a small number of BSLs in the APA not eligible or available.

Applicants should review the detailed BSL-level data and mapping available through Link Up Idaho to understand which locations are currently available within each APA.

5. Question: Has the BSL template been updated to include only eligible locations?

Answer: Yes. The most current APA and BSL information available for the PAC Bidding Round has been posted on Link Up Idaho. Applicants should rely on the materials currently posted on the website when preparing their submissions.

<https://linkup.idaho.gov/idaho-bead-subgrantees/>.

6. Question: Does the BSL template include BSLs identified as Community Anchor Institutions?

New! Answer: The list of BSLs in the Round 3 APA BSL template (Eligible Locations Reference tab) includes all BSLs available for bid during this open application round. BSLs that are identified as a Community Anchor Institution are marked with a "Yes" in Column C of the BSL list posted here, https://linkup.idaho.gov/wp-content/uploads/2026/08/Final_Round3_APA_BSL_Template-8.13.2026-1.xlsx.

APA and BSL Data Access

7. Question: When will access to Survey123 and the APA/BSL worksheets be available?

Answer: Instructions and access information for Survey123 were distributed immediately after the webinar on August 14, 2026. The APA and BSL templates are already available on Link Up Idaho alongside the interactive map and related bidding materials.

Tribal Areas and Tribal Consent

8. Question: Can applicants propose projects for locations within Tribal lands where Tribal Consent issues may affect existing awards?

Answer: The Idaho Office of Broadband continues to work directly with Tribal Nations regarding Tribal Consent requirements and related PAC adjustments. Consequently, not every APA or BSL located on Tribal land is included in the current rebidding opportunity. Those BSLs located on Tribal land that are listed in the APA BSL Template must have Tribal Consent prior to the winning bidder signing its Subgrantee Agreement.

If Tribal Consent status changes or additional eligible locations become available, Idaho will communicate those opportunities to potential applicants. For the current round, applicants should focus on the APAs and BSLs identified in the official PAC materials.

BEAD Awards and Re-Bidding Process

9. Question: Is there an updated statewide BEAD awards map reflecting recent changes to some of the Idaho BEAD awards?

Answer: The current Link Up Idaho map identifies newly available APAs and BSLs eligible for this rebidding round. However, IOB has not completed the full NTIA Post-Award Change process for those projects approved by NTIA in its Final Proposal. The map does not reflect every project where a subgrantee has requested a change. A comprehensive statewide awards map and related project information will be updated and republished following completion of the rebidding process, IOB award decisions, and NTIA PAC approvals.

10. Question: Why did Idaho reopen bidding instead of offering returned projects to the next-ranked bidder?

Answer: The Idaho Office of Broadband evaluated several options and determined that a new competitive bidding opportunity was the most transparent and equitable approach.

Since the original application period, significant time has passed, project assumptions have changed, and construction costs, network designs, and market conditions have evolved. Reopening the process to all eligible bidders allows interested providers to submit updated proposals based on current conditions and available information.

11. Question: Can applicants ask IOB to reference or incorporate previously submitted bids from the prior bidding rounds as the applicant's new submission for the same APAs or set of BSLs during this round?

New! Answer: No, all applicants must enter new applications for each of their proposed projects into the Survey123 Portal during this rebidding round.

Applicants may use prior work and familiarity with the areas to streamline and facilitate the current application process, but IOB encourages applicants to review the new APA Map and the new APA/BSL list for this rebidding round. Many APAs may look quite different than they did during the Subgrantee Selection process. This could be because only a subset of BSLs within the APA may be available during this round, or the costs to serve the APA may have changed.

If you need any documentation from the Subgrantee Selection Process, let us know, and we can provide materials.

12. Question: How can applicants identify when a bid for one APA is dependent on an award for another APA, so that an applicant can only accept an award if both APAs are included in the approved project?

New! Answer: Applicants can use the "Notes" column (APA Worksheet Tab, Column I) in the Round 3 APA BSL Template to indicate any interdependencies between APAs or to note when an APA can be severed from a project if necessary for the project to be approved. Specific information about proposed APAs or BSLs can also be included in the project description narrative in the Survey 123 questions. IOB will consider these requests and descriptions when reviewing projects but cannot guarantee it can accommodate specific requests.

Existing Projects and Project Expansion

13. Question: Should an existing subgrantee add new APAs to an existing project or create a new project?

Answer: Either approach may be appropriate depending on the applicant's network design, construction strategy, permitting considerations, and overall project management approach.

Applicants should consider factors such as:

- Network architecture and operational efficiency
- Construction sequencing and milestones
- Environmental and Historic Preservation (EHP) review requirements
- Permitting schedules
- Project management and reporting complexity

Applicants should evaluate which option best supports successful project delivery while maintaining compliance with BEAD requirements. Applicants will propose the option they want to apply to each project during Phase 2.

14. Question: Should applicants submit the information for Phase 1 differently depending on whether they plan to expand an existing project or propose a new project?

Answer: For purposes of the PAC Bidding Round, applicants should submit each proposal as a standalone project. It should submit project information in this Phase, such as its network design, requested award amount, matching amount, project costs, and technical details regarding the project, as if it is a stand-alone project. If necessary and applicable to the integrity of the proposed project, applicants can describe in the narratives of the Phase 1 application where the proposed project will rely on the infrastructure or resources of an existing awarded BEAD project.

If an applicant is selected for an award, the applicant will be required to specify whether the project is proposed to be an amendment of an existing BEAD awarded project or a stand-alone new project, and the applicant will submit the required documentation (budgets, SGA attachments, timelines, etc.) either as an amendment for an awarded project or as a stand-alone project.

15. Question: If I add an APA to an existing project, do I only submit information for the new APA?

Answer: Yes. For the Phase 1 application process, applicants should provide project-specific information associated with the APA(s) and BSL(s) included in their proposed project submission, including relevant project costs, award amounts, project designs, and supporting documentation.

If the proposed project is later incorporated into an existing awarded project through an amendment process, the combined project information may be consolidated at that time.

Additionally, if a bidder has one technology type in one area and another technology type in another area, the projects can be combined as long as the applicant can certify that it will provide BEAD qualifying service throughout the entire project area.

NEPA and Environmental Review

16. Question: When will subgrantees that are awarded new projects, or have significantly updated their existing projects, be expected to complete their EHP reviews so that they can start construction?

Answer: Subgrantees awarded APAs and BSLs during this PAC Bidding round must first execute their Subgrantee Agreements or amend their currently signed Subgrantee Agreements prior to starting their EHP data submission.

Once the agreement is executed or amended, subgrantees may begin the EHP review process for these new areas, including evaluating whether projects can be further divided into discrete NEPA Project Areas.

IOB will work with subgrantees that have already started their EHP processing to adjust the timeline for any amended projects.

Regardless of the timing of the Subgrantee Agreement, IOB continues to encourage subgrantees to start the research and to start gathering resources for their EHP obligations as soon as possible.

Participation Requirements

17. Question: Must existing BEAD subgrantees participate in the PAC Bidding Round?

Answer: No. Existing subgrantees are not required to participate if they do not intend to pursue additional APAs or expand their current project footprint.

Current projects will continue through the normal program implementation process regardless of participation in this rebidding opportunity.

18. Question: Do applicants with multiple projects sign and upload separate Attestations for each project, or can the applicant upload a single Attestation that IOB can use for each project?

New! Answer: Applicants must upload separate Attestations for each project.

19. Will applicants that are awarded projects during this round of bidding have to sign the Idaho Subgrantee Agreement within the same timeframe as all other subgrantees?

New! Answer: Yes, all Idaho subgrantees, including new subgrantees awarded projects for the first time during this round, must sign the Idaho Subgrantee Agreement within the same time period as all other subgrantees. IOB currently has a September 24, 2026 deadline set by NTIA for all subgrantees to sign Subgrantee Agreements. The current version of the Idaho BEAD Subgrantee Agreement is posted on Link Up Idaho, https://linkup.idaho.gov/wp-content/uploads/2026/07/IOB-BEAD-Subgrant-Agreement_Template_July-2026-1.pdf