

**Revised Alaska Broadband Grant Program
Application Portal and Notice of Funding Opportunity
Frequently Asked Questions**

The Alaska Broadband Office (ABO) is posting questions that it receives from the public on the revised Alaska Broadband Grant Program while the Application Portal is open between July 3, 2025, and July 27, 2025. Updated versions of this FAQ document will be posted twice weekly.

Questions received before 5pm on Tuesdays will be answered by 5pm on Wednesdays; questions received before 5pm on Thursdays will be answered by 5pm on Fridays.

1. Will ABO grant any waivers for matching funds requirements? If yes, what are the criteria for a match waiver?

Matching funds waivers are addressed in section 7. *Project Prioritization* under *Section 1 – Program Information* of the Alaska Broadband Grant Program Revised Notice of Funding Opportunity (NOFO). Applicants may request a waiver using Appendix C, the Federal Match Waiver Request Form. Both documents are available on the Alaska Broadband Grant Program page of the ABO website:

<https://www.commerce.alaska.gov/web/abo/AlaskaBroadbandGrantProgram.aspx>.

2. Can an applicant combine PDPAs in one application, or must they be submitted in separate applications? When will the new BSL list be available?

Yes, applicants can combine PDPAs in one application. The new BSL list is available on the ABO website as Appendix I:

<https://www.commerce.alaska.gov/web/abo/AlaskaBroadbandGrantProgram.aspx>.

3. Do applicants need to re-register in DCRA portal? Our organization has an organization profile from the earlier NOFO, but when I log in, I'm not seeing the grant opportunity. Is there something applicants need to do in order to be able to see the new application in the portal?

When you click the link on the ABO website, it will take you to the log-in screen for the DCRAGrants Portal. Listed under Funding Opportunities you should see “Alaska Broadband Grant Program – Updated per Policy Notice”. That is the grant opportunity you want to click on. There is no need to re-register in the portal.

4. The new NOFO at 5.1.5 requires: *Certification to ensure reliability and resilience of broadband infrastructure by establishing risk management plans that account for technology infrastructure reliability and resilience, including natural disasters (e.g., wildfires, flooding, tornadoes, hurricanes, etc.), as applicable, as well as cybersecurity best practices*. We don't see a place for this. And is this just a simply certification that we've established risk management plans or do we upload our risk management plans?

Criterion 10 Weather/Climate Threat Assessment and Mitigation Planning has been removed; a climate risk management plan is no longer required. However, the applicant will need to certify that they have incorporated best practices for ensuring reliability and resilience of broadband infrastructure as part of the engineering.

Criterion 9 Cybersecurity and Supply Chain Risk Management (C-SCRM) will require certification check box and completed Appendix G.

5. Criterion 7 and 9: Is there a requirement for a narrative or is it just a certification by checking the box? Understood that Criterion 9 also requires Appendix G to be signed and uploaded.

Criterion 7 only requires the Certification check box; the narrative box is provided for any additional information the applicant would like to submit.

Criterion 9 requires the Certification check box and signed Appendix G. The narrative textbox is provided for any additional information the applicant would like to submit.

6. Criterion 5 PE Certification: Where and how do we meet the requirement that “All engineering documents are required to be certified by a professional engineer licensed in the State of Alaska as part of the application”

Per the BEAD NOFO, page 74, which reads: *“Prospective subgrantees must submit a network design, diagram, project costs, and build-out timeline and milestones for project implementation, all certified by a professional engineer...”*, the example provided is acceptable to meet the requirement.

Certificate of Professional Engineer

I have examined the following documents being submitted to the Alaska Broadband Office for application _____

- network designs
- diagrams
- project costs
- build-out timeline and milestones for project implementation

I hereby certify that the proposed network can deliver broadband service that meets the requisite performance requirements as defined by the Alaska Broadband Office Notice of Funding Opportunity to all locations proposed to be served by the Project.



Jane C. Doe
Alaska Registered Professional Electrical Engineer
License #EC000000

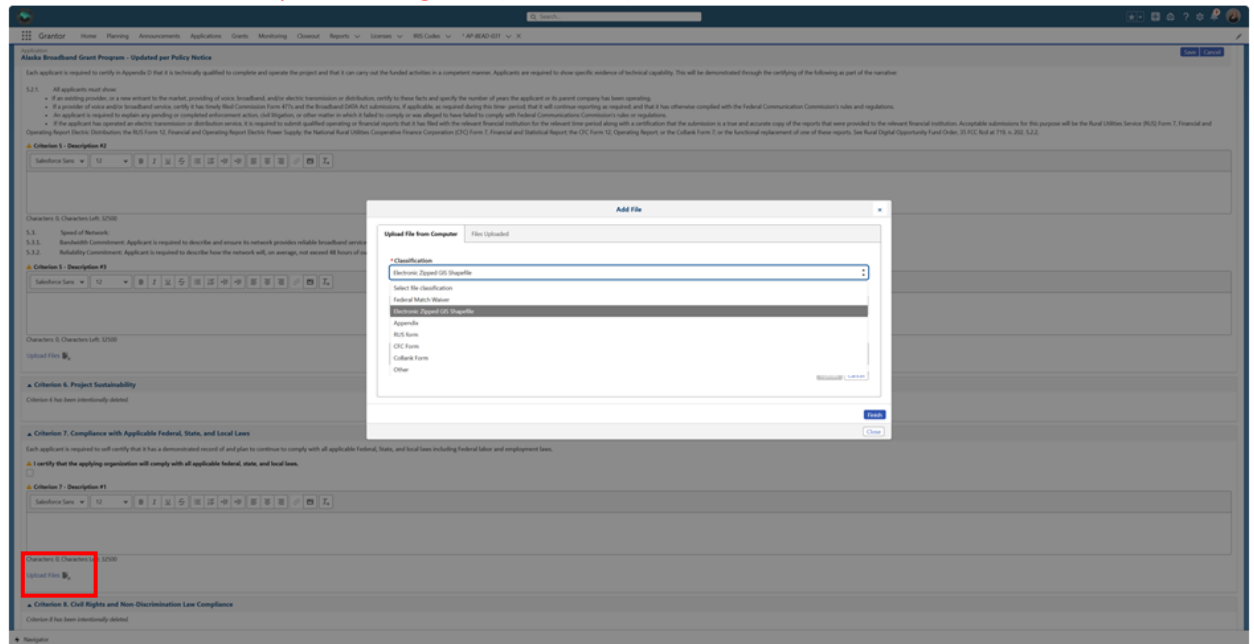
Note: The ABO has removed *“a capital investment schedule evidencing complete build-out and the initiation of service within four years of the date on which the entity receives the subgrant”* as a result of a limited conditional programmatic waiver granted by the NTIA.

7. Is there a template for the requested zipped shapefile of the engineering diagrams? For example, are there required attribute fields or a preferred datum/projection?

The ABO has not developed a standardized template, but industry standards such as TIA-606 and ASCE 38/75 can be applied for telecom infrastructure mapping and whatever meets your PE's requirements.

8. The portal doesn't seem to have a specific area to attach the engineering shapefile as noted in the NOFO. There is an area to upload files, but the dropdown categories do not include the shapefile. How should the shapefile be attached?

The zipped GIS shapefile should be uploaded as part of Criterion 5. Technical Capability. There is an "Upload Files" at the bottom of the section and an "Electronic Zipped GIS Shapefile" classification in the dropdown categories (see below).



9. MQ12: The previous NOFO said we had to submit proof of consent from any "tribal entity" upon whose lands the infrastructure will be deployed. The new NOFO has changed "tribal entity" to "Alaska Tribe." Since, as you know, the tribes themselves do not own the land, this wording change is substantial; it seems to indicate that we no longer need proof of consent at all. Can you clarify whether this was the intent of the wording change, and if not, what is now required, if anything, in terms of proof of consent?

Proof of consent must be from the landowner. If a Tribe owns the land, then consent would be needed from the Tribe for that land only. If a corporation, municipality, or city owns the land then consent would need to come from the respective landowner. The change that has occurred is that in the original Alaska Broadband Grant Program NOFO, in addition the applicants had to show that they had notified Tribes of their intent and if the applicant won, continue to notify the tribes of how the project is going; in the revised NOFO, applicants do not need to notify Tribes pre-award. If an applicant is selected as a subgrantee, "Subgrantees are required to contact, and show proof of contact or attempted contacts, each Alaska Tribe's government where the

infrastructure will be built on Tribal Lands and share the high-level plans for middle mile (where applicable) and last mile infrastructure that will be on those lands throughout the project.”

10. MQ3: If an applicant’s “pro formas” would all be zeroes because the project will result in a partnership agreement in which the partner rather than the applicant becomes the service provider, can we just not submit pro formas and explain this in the narrative?

“Pro Formas” are required. If an applicant applies with a \$0 filled Pro Forma, the application will be rejected as a “fail” on Criterion 5.

11. MQ3: Because of the highly specialized nature of these projects, are applicants allowed to use sole-source contractors?

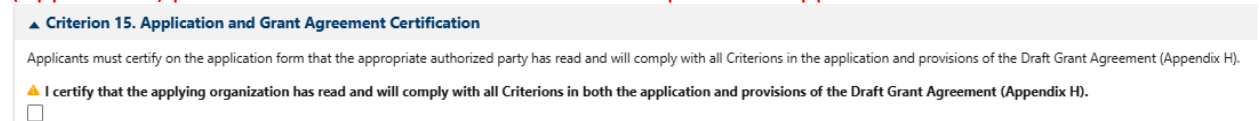
Applicants/Subgrantees are not required to post RFPs for subcontractors. Subcontractor selection is the applicant’s/subgrantee’s prerogative as long as it conforms to Criteria 2 and 5.

12. MQ 2: The NOFO states, “List the existing and proposed full-time-equivalent (FTE) employees to be dedicated to the project.” Does this mean you only want employees who will be full-time equivalents on the project to be listed, or does this mean you want a breakout of the % of FTE for each listed project position (e.g., foreperson 10% FTE, field manager 20% FTE, etc.)?

The required level of detail is a breakout of the % of FTE for each listed project position (e.g., foreperson 10% FTE, field manager 20% FTE, etc.).

13. Appendices: In the portal, the Appendices page appears to indicate that applicants are to upload Appendices H & I, but these look like informational documents only. Should we just upload those two appendices as is, or do you want something more there?

Appendix H and Appendix I are informational only. They do not need to be uploaded. The applicant will certify in Criterion 15 that they have received and read the Draft Grant Agreement (Appendix H) per the screenshot below. No action is required for Appendix I.



▲ Criterion 15. Application and Grant Agreement Certification

Applicants must certify on the application form that the appropriate authorized party has read and will comply with all Criteria in the application and provisions of the Draft Grant Agreement (Appendix H).

▲ I certify that the applying organization has read and will comply with all Criteria in both the application and provisions of the Draft Grant Agreement (Appendix H).

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14. To clarify [FAQ #9 about MQ12]: Is your response still focused only on tribal lands? In other words, we need to get proof of consent for any tribal lands included in the project, regardless of owner? (And if so, will there be a NOFO addendum so that is clear?)

No. It is simply: Landowner has say over permitting. If an application design traverses Regional Corporation and Village Corporation land, consent will need to be obtained by both. If the applicant’s design traverses a Tribe’s land, then that Tribe would need to provide consent. If an applicant does not traverse Regional or Village Corporation land or a Tribe’s land, then no consent from those parties is necessary. In short, non-landowners have no say. Additionally, pre-award, applicants do not need to provide any notification to non-landowners.

Or, are you now saying that proof of consent is required for all lands (as sort of implied by the inclusion of municipality and city owned land in your response)?

Pre-award, applicants need to show consent from Tribal landowners the proposed network crosses. Post-award, subgrantees need to show consent from all landowners the network crosses.

15. We noticed in Alaska's updated BEAD NOFO that the Criterion 12 language changed that previously required prior to submission of a BEAD application an Applicant is "required to contact, and show proof of contact or attempted contacts, each federally recognized tribal government (Tribe) in whose community/communities the infrastructure will be built and share the high-level plans for middle mile (where applicable) and last mile infrastructure that will be built in the community." We note the updated language in the BEAD NOFO still requires attempted tribal contact and support, but only if awarded BEAD funds.

- a. If we send the letters now (prior to award) can they be considered proof of attempted contact if/after awarded?

Pre-award notification to non-landowner Tribes is no longer required. No, pre-award letters are not transferable. Notification post-award will be required separately.

- b. Is it acceptable to also send emails (prior to award) to demonstrate multiple contact methods/attempts?

Pre-award notification to non-landowner Tribes is no longer required.

16. Regarding the C-SCRM, Appendix G states that applicants must certify that "a cybersecurity risk management plan is ready to be operationalized upon providing service." The NOFO states, "if necessary and requested by the NTIA, applicants must provide a copy of their C-SCRM compliance plan."

Is the intent that applicants have a plan in place by the application deadline, or that they will have one in place by grant award? (For instance, is it likely that the NTIA would request a copy of the plan during the review process, or would it not be requested until award?)

You have to be able to provide your C-SCRM plan as requested by the NTIA once you provide service. If you already are providing service (option 1 in Appendix G), the NTIA can call for your plan immediately. If you are providing new service (option 2 in Appendix G), the NTIA can only call for your plan once you provide service.

17. The latest Excel file includes a worksheet named "Non-BSLs and Enforceable Comms". How are those locations intended to be addressed in funding applications?

The Non-BSLs and Enforceable Comms are not to be included in applications. They are included only as reference. The Non-BSLs (PDPA 32-02) include downed aircraft, water tanks, etc. that the ABO has requested that the FCC remove; and the Enforceable Commitments (PDPA 32-03) are BSLs that will become Served with other federal projects.

18. A file named "Newtok-Mertarvik Lat-Long (R1 07-07-25)" has been posted with replacement lat/long coordinates for 78 BSLs. Are those BSLs all eligible for BEAD funding? Many of them

currently show up on the "Non-BSL" tab of the Appendix I Excel file instead of the "Appendix I" tab.

The ABO will move 74 Newtok-Mertarvik locations back into Appendix I from the Non-BSL and Enforceable Comms sheet.

19. Community Anchor Institutions now show up in the "Appendix I" list of funded locations with Location IDs in the 3190000000 range. These don't seem to match location_ids from the FCC's fabric. Is there a different source that has lat/long coordinates for these locations?

The Community Anchor Institutions (CAI) are not in the FCC Fabric, they are a result of the Initial Proposal Volume 1, Instate Mapping Challenge. Previously the CAI were in a separate spreadsheet. The ABO has integrated them into Appendix I with a unique 319000... ID (C = 3, A = 1, I = 9). There are only address references for the CAIs.

20. Do the audited financial statements for our parent company and its subsidiaries meet the requirements for audited financial statements for the entity applying to the NOFO (a subsidiary)?

Submission of audited financial statements at the parent-company level is acceptable if the parent company is publicly traded.

If the parent company is not publicly traded, the ABO may accept an audit in the context of demonstrating financial capability if the audit:

1. Adheres to Generally Accepted Government Auditing Standards (GAGAS): [Government Auditing Standards \(GAO-24-106786\)](#), and
2. Includes an audit of the operations of the subsidiary expending the federal funds.

21. When submitting requirements for Criterion 2, should we follow the numbering guidelines in the NOFO or the grant portal?

Use the portal numbering.

22. The NOFO states that ineligible costs include pre-application submission engineering, environmental mitigation, and federal, state, and local taxes. However, it also states that this is not an all-inclusive list, and that applicants should reach out to the ABO with additional questions about eligibility vs ineligibility. What, if any, pre-award costs are eligible to be included in the budget? Is there a complete list available, or are all pre-award costs ineligible?

All pre-award costs are ineligible.

23. In the most recent ABO NOFO (under Criterion 3: Financial Capability, Section 3.5), the applicant is now required to provide audited financials, rather than a promise to provide audited financials based on an award. This is a deviation from the previous ABO NOFO with no change directed by the latest version of the NTIA NOFO. Is this an oversight? Can you please clarify?

Section IV.D.2.a.iii. of the original BEAD NOFO requires applicants to submit "...financial statements from the prior fiscal year that are audited by an independent certified public accountant... or, submit unaudited financial statements from the previous fiscal year and certify it will provide audited financial statements...by a deadline specified by the Eligible Entity."

Under the original NOFO for the Alaska Broadband Grant Program, the ABO allowed for certified financial statements to be submitted within 60 days of application due date, which would have been June 13, 2025. This timeframe was in place because the ABO had a 90-day application review and scoring period. The accelerated timeline established by the June 6, 2025, BEAD Restructuring Policy Notice requires Eligible Entities (states) to submit subgrantee selection results as part of the Final Proposal by September 4, 2025. To fully evaluate the financial capability of each applicant prior to subgrantee selection, the ABO must have access to audited financial statements at the time the review and scoring process begins on July 28, 2025. This is 45 extra days beyond the original deadline.

When the ABO paused the Alaska Broadband Grant Program application period pending receipt of new federal guidance, prospective applicants without audited financial statements should have been well underway to securing the services of a certified public accountant to fulfill this application requirement. Furthermore, during the pause, the ABO encouraged applicants (through website postings and virtual listening session announcements) to continue working on Criterion 3 (Financial Capability) and Criterion 5 (Technical Capability). The requirement for audited financial statements, within Criterion 3, by the application deadline is within the original parameters.

As an option, the ABO can accept audited financial statements from a parent company if the audit:

- 1) Adheres to Generally Accepted Government Auditing Standards (GAGAS): Government Auditing Standards (GAO-24-106786); and
- 2) Includes an audit of the operations of the subsidiary expending the federal funds.

24. This question is in regards to conflicting addresses between Appendix I and the BSL map for a CAI in a specific community.

The Excel file shows [Community] location ID [#] as [Address]. The BSL mapping shows [Different Address]. We'd appreciate your help to reconcile.

We also talked about the [Community] school with multiple CAIs at the same address (it's a campus type layout). Will it be ok to terminate fiber in a logical campus location and include the cost for campus distribution from that point?

Please provide the corrected address in your Criterion 5 Technical Capability narrative. If there is both a BSL reference and a CAI location for the same location, please design the network to fulfill the BSL requirement as the CAI requirement only occurs if there is funding remaining after the Unserved and after the Underserved BSLs respectively. The NTIA recently redefined some of the definition of CAI, so the references may change (there may be fewer in the community).

25. In the context of the Supra Scoring below, during review, can the ABO consider Tribal Indirect Costs as 'excessive' when evaluating a priority broadband project? Said another way, will a Tribal

applicant be penalized for choosing to apply their full indirect rate in excess of the baseline 10% allowable?

Priority Broadband Projects. *If an Applicant's application is the only "Priority Broadband Project" as defined below and all other applications do not meet the definition of "Priority Broadband Project", then the Priority Broadband Project, after the State assesses that the project does not "incur excessive costs", will be awarded to the Applicant with the "Priority Broadband Project" with no other scoring evaluated.*

If there are multiple "Priority Broadband Projects" that do not incur excessive costs or the "Priority Broadband Projects" incur excessive costs, then the State shall select a lower cost Priority Broadband Project or non-Priority Broadband Project based on the scoring criteria in subsections B. or C. below.

The term "Priority Broadband Project" means a project that provides broadband service at speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads, has a latency less than or equal to 100 milliseconds, and, in order to ensure equal access to broadband by all Alaskans, can easily scale speeds as determined by FCC Broadband Benchmarks over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services.

In the context of Supra Scoring, and potentially Primary Criteria Scoring – Minimal BEAD Program Outlay, the answer is potentially. If a project is determined to incur "excessive costs," it is not the Indirect Cost that will be evaluated as excessive, but rather the total project cost, or the cost per BSL within the project. The greater the Indirect Costs charged to the project, the greater the impact on the total project cost. For all applicants with a Negotiated Indirect Cost Rate Agreement (NICRA) that has a substantial Indirect Cost rate, the impact could push the total project cost to be considered "excessive." All applicants should be mindful that the inclusion of Indirect Costs in a project budget is totally voluntary. Applicants may choose to submit Indirect Costs at, or below, the 15% de minimis rate; at an approved NICRA rate; or submit zero Indirect Costs.

26. We are requesting clarity on Appendix G, since [redacted] will be the broadband service provider and [redacted] will only be doing installation, we wanted to clarify with the State whether the act of installation is considered "providing service" as set forth in Appendix G to determine if the install will trigger the provision of any plans.

The Applicant is responsible for all metrics. By way of example, if a hypothetical "JoJoTel" is the applicant to the State of Alaska, "JoJoTel" is solely responsible for all metrics associated with the Alaska Broadband Grant Program. "JoJoTel's" sub-providers are not responsible to the State of Alaska. This includes Appendix G, any bandwidth and latency metrics, and responsibility for any audit findings.

27. If an applicant has partnered with a broadband provider who will become the service provider upon project completion, do we still only complete Appendix D with applicant info?

Yes.

Or do you want the eventual ISP's info in this document (or in a separate Appendix D)?

The goal of the program is not just to build, but to provide service. The Applicant is responsible for all metrics. By way of example, if a hypothetical “JoJoTel” is the applicant to the State of Alaska, “JoJoTel” is solely responsible for all metrics associated with the Alaska Broadband Grant Program. “JoJoTel’s” sub-providers are not responsible to the State of Alaska. This includes Appendix D, Appendix G, any bandwidth and latency metrics, and responsibility for any audit findings.

28. If a partner is going to provide staff to fill project roles listed in the NOFO but isn't going to receive any funding through this grant, do we still need to list their FTE %'s, even though those won't have any impact on the project budget?

Yes.