

**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

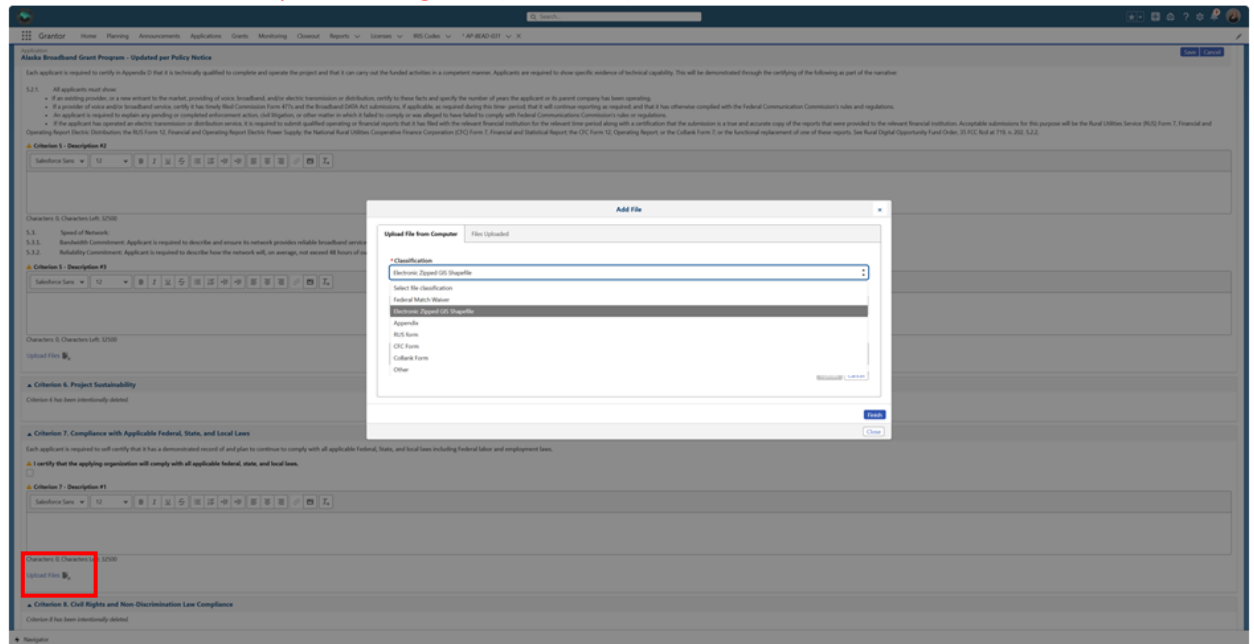
Note: The ABO has removed *“a capital investment schedule evidencing complete build-out and the initiation of service within four years of the date on which the entity receives the subgrant”* as a result of a limited conditional programmatic waiver granted by the NTIA.

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?

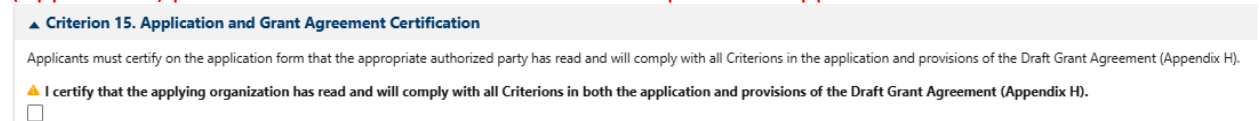
Applicants/Subgrantees are not required to post RFPs for subcontractors. Subcontractor selection is the applicant’s/subgrantee’s prerogative as long as it conforms to Criteria 2 and 5.

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.

29. Per 2 CFR 200.306, [applicant] would like to use the unrecovered 15% de minimis towards our required match. Is this approved by the State on this program?

No.

30. On 8.1.4. operational costs, the last line states, "Applicants may use an indirect rate below the full de minimus percentage or eliminate indirect costs from the project budget." Would an applicant without a NICRA calculate MTDC and apply the 15% de minimis rate as indirect costs? In other words, would an applicant apply 15% of MTDC as an "indirect costs" line item in the budget? Or does the requirement here require applicants to list specific overhead costs as separate line items under the category of indirect costs, up to 15% of MTDC?

An applicant without a NICRA may apply up to the 15% de minimis rate of MTDC as "indirect costs" and would include them in the Indirect line item in the budget.

31. Appendix I includes a column for CAIs and another column totaling BSLs and CAIs. Are the CAIs in addition to BSLs, or just a categorization of the BSL? Put differently, will the ABO add BSLs and CAIs in an applicant's service area when calculating cost per location, or just the BSLs?

The CAIs are in addition to the BSLs. However, consistent with the BEAD NOFO, CAIs are a third priority for funding, behind Unserved and, if funding allows, Underserved BSLs. When calculating cost per location, the ABO will utilize just the BSLs.

32. I am receiving an error message when I attempt to upload a resume to the Criterion 2 File Upload. I am not sure what limit I am reaching that would be too big/long to cause the error message. I have 13 other uploads, comprising resumes, policies, and other information, that are already uploaded. Each one is under the 2GB limit per the directions on the upload page. Is there a limit to the number of uploads or a data limit for a cumulative of all uploads?

There is not a limit to the number of files that can be uploaded and the 2GB limit is for a single file upload, not cumulative. What file type are you trying to upload?

They have all been PDF uploads. It might be a limit on the number of files (13 max) because I ended up combining some of the resumes to see if I could upload more documents and it worked.

33. How may we get a GIS file of the Alaska Broadband Serviceable locations V6 as shown on the DCCED web map?

The [Broadband Serviceable Location Fabric](#) map contains FCC proprietary data and requires a CostQuest Tier D license to access. This license is free, but the broadband service provider will need to submit their FCC Registration Number (FRN) when creating an account. A CostQuest Tier D license can be requested here: [CostQuest Licensing | BroadbandUSA](#). Additional information on how to access and download the [Broadband Serviceable Location Fabric](#) map can be found here: [How Broadband Service Providers Can Access the Location Fabric – BDC Help Center](#).

34. Mobility infrastructure: Can BEAD funds cover the costs of tower-based fixed wireless solutions and multi-use handsets alongside fiber?

BEAD may cover the cost of towers and wireless infrastructure only in so far as they are built in service to serve Unserved and Underserved BSLs. Wireless handsets are not covered.

35. PE certification: Is a stamped (wet or digital) PE seal required for engineering drawings and site plans, or does the waiver to omit seal on the cost schedule apply here?

A PE stamp is required for all documents except the following language: **“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,”** which was excluded by the conditional programmatic waiver.

36. There has been a continued requirement to obtain proof of support from tribal landowners; however, in Alaska, the vast majority of tribal lands are owned by Village Corporations and Regional Corporations, whose lands are specifically exempted from the definition of tribal lands on page 25 of the NOFO. Therefore, most projects in Alaska will have no relevant tribal landowners, since most Tribes do not own the tribal land. In those situations, do applicants simply explain this in the narrative?

This is a very important question. Technically, the Applicants do not have to have consent from the Regional and Village Corporations prior to the application being submitted. However, the ABO has been encouraging Applicants to obtain the documentation early as there is a stipulation in the Draft Grant Agreement Attachment B – Payment Schedule that reads:

Grant Funds will not be released until Grantee has provided the Department with adequate evidence that Grantee has secured site control for all parcels of land owned by an Alaska Tribe and/or Alaska Tribal Entities necessary to complete the Project. A Tribal Entity includes a Tribal Organization, an Alaska Native Corporation, a Native College, and similar entities owned or controlled by native Alaskans. Satisfactory evidence of site control includes copies of a letter, easement, lease, purchase agreement, deed, license, or other document signed by an authorized representative property owner that specifically provides site control for the proposed project and affected parcel(s).

Additionally, the ABO has updated Criterion 12 to also reflect this:

To the extent the State of Alaska’s Final Proposal includes plans to deploy broadband to Unserved Service Projects or Underserved Service Projects on Tribal Lands, the State of Alaska is required to submit proof of consent from each Alaska Tribe upon whose Tribal Lands the infrastructure will

be deployed. Each Applicant is required to obtain the necessary proof of substantial time-relevant evidence such Alaska Tribe has granted site control to the parcel or parcels of Tribal Land needed for the proposed project (e.g., a letter, easement, lease, purchase agreement, deed, license or other document signed by an authorized representative or body of such Alaska Tribe that specifically provides site control for the proposed project and affected parcel(s) ("Site Control")). Further, no payments for eligible costs under the Grant Agreement will occur until the Applicant/Subgrantee provides the State of Alaska with the appropriate Site Control documentation.

Likewise, if the State of Alaska's Final Proposal includes plans to deploy broadband to Unserved Service Projects or Underserved Service Projects on lands owned by any tribal entity, i.e., Village Corporations, Regional Corporations, or other tribal organizations, the State of Alaska is required to submit proof of consent from each Tribal Entity upon whose lands the infrastructure will be deployed. Each Applicant is required to obtain the necessary proof of substantial time-relevant evidence such Tribal Entity has granted site control to the parcel or parcels of land owned by the Tribal Entity needed for the proposed project (e.g., a letter, easement, lease, purchase agreement, deed, license, or other document signed by an authorized representative or body of such Alaska Tribe that specifically provides site control for the proposed project and affected parcel(s) (Site Control))). Further, no payments for eligible costs under the Grant Agreement will occur until the Applicant/Subgrantee provides the State of Alaska with the appropriate Site Control documentation.

In addition, if awarded, 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. At a minimum, the exchange must include what was shared and any questions the Alaska Tribe(s) had and the responses to those questions. If an Applicant is unable to contact an Alaska Tribe, the applicant must show the multiple ways in which it attempted to contact the Alaska Tribe and explain why each was unsuccessful.

37. In the FAQs, you direct applicants to use the portal numbering for Section 2, rather than what's in the NOFO. However, the numbering in the portal appears to follow the old NOFO. At this point, most applicants have already prepared their narratives; are you requiring them to go back and revise their narratives to renumber this section?

No. We have made every effort to match the numbering to NOFO so they should correspond. In circumstances where they do not, the numbering is moot. The reviewers know to look for the specific capacities.

38. The portal still includes "2.1.6. Identify if the project will use any Non-Traditional Providers such as Local Governments (including municipalities or political subdivisions, electric cooperatives, non-profits, or Tribal Governments) and Utilities." Since this is no longer a preference, can we simply respond "N/A" to this item?

This has now been removed from the application.

39. The NOFO states, "All narratives in the application, appendices, and any supplemental attachments must be written in Arial font in a minimum font size of 12." However, this would be extremely difficult; the narrative will be entered into the portal, which presumably has a default font that likely cannot be changed, and the appendices are forms with default fonts. Additionally, many of the attachments will be pre-existing documents. Can you please clarify this statement and note specific items will be required to be in this font?

The portal does allow for changing of fonts, sizes, bold, italics, etc. in the narrative boxes. In any document where the font is elective, please use Arial font size 12.

40. We are unclear on what to do about the 5.1.3 requirement that the budget include a capital investment schedule of milestones for project implementation including:

Stage 1: Workforce Readiness

Stage 2: Permitting

Stage 3: Staging and Materials Acquisition

Stage 4: Construction and Deployment

Stage 5: Operational Readiness Transition

Stage 6: Project Close-Out

The Capital Investment Requirement by Stages in subsection 5.1.3. has been removed due to the NTIA Conditional Limited Programmatic Waiver and Clarification of Professional Engineer Certification.

41. Are the FCC Registration Number (NOFO section 1.3.) and the USAC number (NOFO section 1.4.) required in order to be eligible for the grant?

The FCC Registration Number (FRN) is required for all applicants. A USAC number is only required if the applicant is participating in Universal Service Fund programs.

42. Can you confirm that audited financial statements are required showing three years of activity?

Please refer to NOFO section 3.5.1. which requires audited financial statements for the prior fiscal year. This is not to be confused with section 3.6. which requires the pro forma to show at least three years of operating cost and cash flow projections post targeted completion of the project.

43. Is there a template for applicants to use for the pro forma?

There is no template for the pro forma. Applicants should work with their financial team to prepare a pro forma that meets the requirements outlined in NOFO section 3.6. The pro forma should show three years of operating cost and cash flow projections post targeted completion of the project (so, for the three years after 2028 if that's your targeted completion date, for example).

44. Should [applicant] submit their audited financial statements and pro forma for the organization as a whole or for just the Telecom division?

If the Telecom division has a separate EIN, you can submit financials for that division only. If it is a shared EIN, you need to submit financials for the entire organization.

45. Our Surety is working on the Appendix A1 for our applications. As I understand it, the underwriting company treats a commitment letter with the same process, same scrutiny as issuing a bond. They would like to issue the bond one year at a time given the size of the project. Would the following language additions be acceptable?

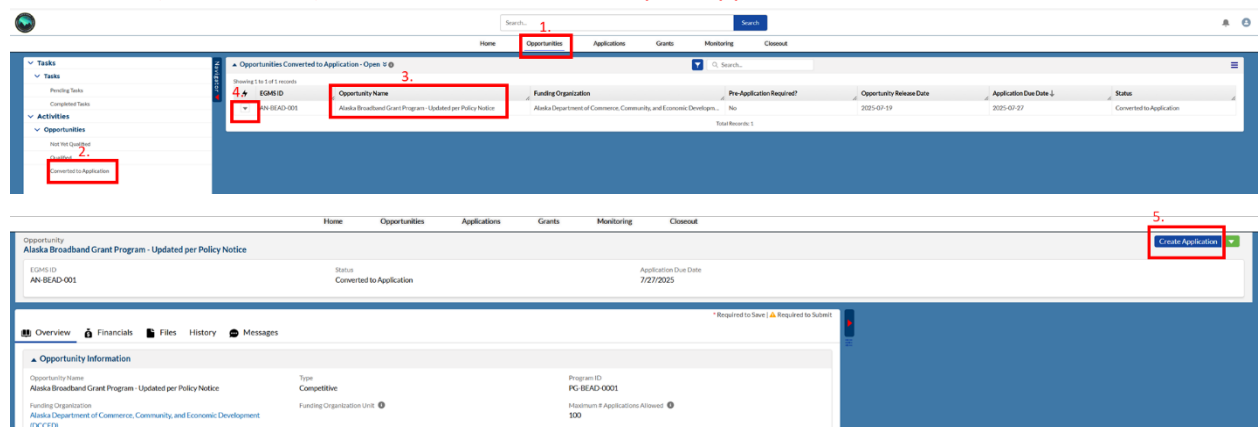
Appendix A1 has been updated. It can be found on the ABO website as version *Updated PN Appendix A1 - Letter of Bond Commitment (R2 07-22-25).pdf*.

46. We are interested in potentially creating a second application for [company]. However, I do not see or understand how to initiate a second BEAD application in the portal. Can you please help us understand what we need to do?

To create a new application, follow the screen shots below.

1. Once logged into the DCRAGrants portal, select the “Opportunities” tab at the top of the page
 2. On the left side menu select “Converted to Application”
 3. You should see the “Alaska Broadband Grant Program – Updated Policy Notice” for which you have already started your 1st application
 4. Click on the down arrow next to the program name and select “View”.
 5. On the next page you will see a “Create Application” button at the top right of your screen.
- This will allow you to start a new application.

- Pro tip: I suggest you edit the application name with something meaningful so you (and the ABO) can differentiate between your applications.



47. We are surprised to find that no values from the Location ID column in Alaska’s Appendix I spreadsheet of unserved and underserved BSLs (screenshotted below) match those in NTIA Fabric v6. We understand per your FAQ dated July 18, 2025 that CAIs have non-Fabric location IDs, but were surprised that non-CAI BSLs don’t match Fabric.

1. Does Alaska provide Fabric Location_ids for these BSLs?
2. If not, are lat/longs provided elsewhere?

A	B	C
Location ID	Pre-Determined Project Area	Primary Address
1010520267	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1374916005	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1374916010	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1374916012	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1374916015	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1374916022	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1374916027	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1374916031	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1374916032	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1374916033	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1374916034	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1374916037	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1374916044	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1374916048	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1374916059	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1374916061	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1374917634	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
1412616144	01-01	This information requires a NTIA Tier D license. Visit https://apps.costquest.com/ntiarequest/ to obtain a Tier D license.
3190000298	01-01	#2 Main St.
3190000070	01-01	100 Main St
3190000286	01-01	Block 22, Lot 2
3190000232	01-01	Block 33, Lot 3
3190000239	01-01	Block 79-82, Lot 4

The ABO looked into this and has found all of the below referenced BSLs in v6. Please provide the source of the v6 that you are using. The ABO is using the NTIA version of CostQuest license that was specifically designed for the BEAD program.

Providing addresses and lat/long would violate our licensing, but Tier D licensing is available from CostQuest for that information.

48. [Follow-up on the ABO's response to FAQ #23] We would like to respectfully clarify a few key points for the record. Per Section 3.5.2.2 of the original NOFO (State of Alaska -- Alaska Broadband Grant Program -- NOFO Final (R1b 02-03-25)), applicants were instructed to provide: "Certification, on Appendix B: Certification to Provide Audited Financial Statements, that it will provide financial statements audited by an independent certified public accountant no later than 90 days after the grant application deadline."
- As no specific calendar date was published in the original NOFO for the submission of audited financials, applicants reasonably relied on the plain language of the 90-day window from the grant application deadline. We also respectfully note that the 60-day submission period referenced in your recent communication appears inconsistent with the original NOFO language. Any change to such a material requirement—especially one that affects applicant eligibility and preparation timelines—would typically require formal written notice, a public comment period, and an official amendment to the NOFO. A change of this nature introduced without those steps creates uncertainty for applicants and may unintentionally disadvantage those acting in good faith.

Additionally, we note that audited financial statements were not included as a potential change during the stakeholder input meetings held on March 26 and 27, 2025. The topic was not identified on the matrix of changes and did not arise during the discussions, further suggesting that the original 90-day guidance was still in effect at that time.

It is also important to note that while publicly traded companies typically complete their audited financials during the first quarter of the year, privately held companies—particularly those with more limited reporting obligations—often do not complete their audits until later in the year. This distinction has a significant impact on timing and availability, particularly for smaller businesses participating in this program.

[...]

You are correct, the timeline for submitting audited financial statements was 90 (not 60) days after the original application deadline. This does not materially change the ABO's initial response to your inquiry. From the BEAD NOFO:

“Audited Financial Statements -- Each prospective subgrantee shall submit to the Eligible Entity from which it seeks funding financial statements from the prior fiscal year that are audited by an independent certified public accountant. If the potential subgrantee has not been audited during the ordinary course of business, in lieu of submitting audited financial statements, it must submit unaudited financial statements from the prior fiscal year and certify that it will provide financial statements from the prior fiscal year that are audited by an independent certified public accountant by a deadline specified by the Eligible Entity.”

At 90 days after the original application due date (April 14, 2025), the deadline for submitting audited financial statements would have been July 13, 2025. With the current deadline for applications and audited financial statements of July 27, 2025, the deadline is still 14 days after when applicants would have needed to submit audited financial statements.

49. Question on the Letter of Credit – would it be acceptable for a project partner to obtain a Commitment Letter from an eligible bank for the LOC for the application, with the expectation that the applicant will be able to obtain the actual LOC or Bond for the project prior to the award being made? The letter would reference the project but would be in the name of the partner, not the applicant.

No. The applicant must obtain the Commitment Letter and it is due at the time the application is submitted.

50. We don't understand what you are looking for exactly in Appendix L. Are we supposed to populate it with every proposed BSL & CAI location with separate rows for each BSL & CAI for each technology that is available to those sites? Considering LEOs reach they all would have 2 or more currently available technology types I would think? Where is that data to come from? (FCC Broadband Map? A specific dataset?) Or are you trying to capture the service levels we currently deliver to those proposed BSLs and CAIs which is in our case zero until the proposed network, if awarded, is ready for service? And if meant to capture all existing services, is the anticipated

download & upload speeds and latency what we would be able to provide over a different technology type (50 - Fiber) as proposed or how their current service offerings might scale over time?

There should be only one technology per BSL. As long as the middle mile technology is statutorily compliant, the technology type that should be listed in column E is the one that touches the BSL or CAI. The columns in Appendix L are intended to be filled in with the Applicant's own proposed project data for Location_ID and EGMS_ID, the current download/upload speeds, the technology type to the BSL or CAI proposed by the project (selected from the options listed), and the anticipated download/upload speeds and latency post completion. For example: An Applicant's design that has a Low Earth Orbit Satellite middle-mile project that terminates with a 2.5 GHz wireless system to the BSL would have one entry in Appendix L for the BSL with the tech code 71 (Licensed Terrestrial Fixed Wireless) selected.

51. Regarding the network design and diagram mentioned in the ABO BEAD NOFO (Criterion 5, page 15), what details are required to be on the diagram if ground-based middle mile is not being utilized?

Network designs and diagrams are required for all aspects of the network builds. In the case where there is not a "ground-based middle mile", a design for the last mile is still required.

52. Does Alaska provide shapefiles for project areas? I was struggling to find them on the website.

The ABO does not provide shape files. The methodology the ABO uses to group like BSLs is in the Pre-Determined Project Areas (PDPAs). The PDPA information is in column B of Appendix I.

53. The Q&A states: In the Q&A, the ABO stated that "Yes, applicants can combine PDPAs in one application." – If we combine multiple PDPAs into one application, is it possible to be awarded only a subset of those PDPAs? Or are they not severable – ie, you either win all or lose all PDPAs in an application?

Generally, the ABO expects to award based on the full BSL counts (PDPA(s) or Project Areas) in the applications. That being written, the ABO also expects the following to occur (from the NTIA's June 6 Policy Notice): Eligible Entities [State of Alaska] must also allow applicants to propose to exclude select broadband serviceable locations (BSLs) 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).⁴¹

Footnote 41: Eligible Entities must solicit bids from other potential applicants for any such eliminated BSL, or applicant may propose a multi-provider solution.

As such the ABO anticipates that there may be circumstances where there will be severed BSLs from PDPAs or Project Areas. The ABO will have to make the determination after the applications have come in.

54. I'm a little confused about where some of the completed attachments should be uploaded – for example, should the completed Appendix D be uploaded under the Supporting Document Checklist, or under Criterion 5 in the Application Form?

Attachments should be uploaded to the corresponding Criterion where required (ie. Appendix D to Criterion 5 via the “upload file” option within the Criterion section). The Supporting Document Checklist is to provide the appendices for download. These are also available for download from the ABO website.

55. Across our multiple communities in our pending proposal, we are proposing to omit a few locations based on their remote location and high-cost characteristics. We do note those specific numbers by community as part of our Project Abstract. Do we simply not include those locations in our Shapefiles that of course will include all proposed BSLs & CAIs or is there some other treatment of them in our proposal that you would suggest?

This is addressed in the last bullet under section 5.1.1. in the NOFO. Yes, you can omit them from your shapefile.

56. How can [company] meet the requirement to provide Audited Financial Statements, as it is a startup and does not have any financial statements yet, and has not had an audit?

Audited financial statements are a requirement of the BEAD NOFO. If you have a subcontractor who will do the lion's share of the work, you can submit their audited financial statements if they allow.

Is the requirement that any associated entity can provide them, and if they are taking them from any entity, why would we show a very small player with a financial statement that has been audited if they might not be a principal in the project? Is there any criterion for whose financial statements they will accept? Is there a waiver for this? What do we do if the contractor "does not allow them to share their audited financial statements?

The audited financial statements are in the BEAD NOFO, and they were not removed by the NTIA's June 6 Policy Notice. The ABO cannot remove those Criterion without being out of compliance with the federal requirements. Additionally, due to the timeline established by the Policy Notice, the ABO cannot accept these required application elements after the application deadline. The ABO encourages you to put in your best application and submit what you can.

57. We need clarity on how to populate several columns in the new Appendix L requirement. How do we complete Columns C and D since we don't currently offer service to the proposed BSLs and CAIs? For Columns F and G, if we plan to offer multiple plans at different speeds, what values do we enter here?

For columns C and D, if the BSLs/CAIs are currently unserved, fill these columns in with 24 (mbps download) and 2 (mbps upload). If they are currently underserved, fill these columns in with 99 (mbps download) and 19 (mbps upload). The ABO understands that you are not the provider but you're using the maximum values for unserved and underserved in those columns.

For columns F and G, if you will be providing multiple plans, report the highest speeds you will provide in those columns.

58. FAQ item #41 states, "The FCC Registration Number (FRN) is required for all applicants." As an applicant new to the market, we do not yet have an FRN. Can we simply enter n/a (or leave blank), or do we need to explain that somewhere in the narrative? If the latter, which section of the narrative do we need to include that information in?

All applicants must have an FCC Registration Number (FRN) provided at the time of application.

To view instructions to apply for an FRN please visit

https://apps.fcc.gov/cores/html/Register_New_FRN.htm

Applying for an FRN requires an FCC Username Account. To create a Username Account, click on the link provided at the web address provided above. Once an FCC Username Account has been created you can log in to the Commission Registration System (CORES) and register for an FRN using the instructions provided at the web address above

59. We are experiencing an issue in the portal. For multiple text upload boxes (Budget Narrative, Criterion 5.1 for example), text that has a character count short of the stated maximums enters fine without truncation but the Save function won't execute and displays a message that the subject text exceeds the character limit which it definitely does not.

If applicant receives an error regarding limited characters in a narrative box when the limit has not been reached, the solution is to highlight the entire text section and change the font, size and bold/italic or other special formatting to one single consistent format. Ex. Highlight all text and change font to Arial, 12, non-bold. The system does have limited font types and does not recognize mixed formatting.

60. Can you please clarify what ABO is looking for in this "fully filled out capital cost MS Excel Model" outside of the budget value inputs directly into the portal and the budget narrative?

Criterion 5: Technical Capability

All elements are required to be present for a pass) (Must provide an electronic engineering zipped GIS shape file of the network and a fully filled out capital cost MS Excel model)

Each Applicant is required to submit the following documents. All engineering documents are required to be certified by a professional engineer licensed in the State of Alaska. For clarity, these requirements are sourced from the BEAD NOFO, page 74, which reads: "Prospective subgrantees must submit a network design, diagram, project costs, build-

NOTE: The ABO has revised its response to this question:

While it is not necessary for it to be certified by a professional engineer, 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, in an Excel format, is required. What the ABO is looking for is a capital investment schedule that would pass a reasonable assessment by a telecom engineer.

61. Can I assume that the stages previously listed for a capital investment schedule (workforce readiness, etc.) are no longer required and ABO is just asking for us to show the **total project budget** spread across the schedule, by quarter, to demonstrate the anticipated spend?

The schedule needs to include detail indicating what the capital expenditure will be spent on, but it does not need to be in those six stages.

62. Could you please let me know the dates for when Public Comments on your states' BEAD Benefit of the Bargain grant applications from prospective subgrantees will be accepted?

The ABO anticipates holding public comment period in the third week of August. The ABO will post the specific date range at a later time.

63. One of our applications requires a backhaul - and we can provide a lower cost bid with a higher cost option, or a higher cost bid with a lower cost option - it depends on whether the backhaul is Microwave or Fiber. Obviously, the Fiber is higher initial cost, but more reliable, scalable, lower cost to maintain and a more useful lifespan (although only the first two of those gets considered with the revised BEAD program). The system seems to allow applying with only one costing option - but we are trying to figure out if it is possible to provide a high bid with a lower cost option or a low bid with a higher cost option?

The goal of the program is to provide the best possible service at an economical investment. The ABO is leaving up to the best discretion of the Applicants to decide what that means. At this time, the ABO cannot counsel Applicants on what infrastructure should be employed.

64. Regarding the updated data in Appendix I: previously we needed to use the replacement coordinates in the Newtok-Mertarvik Lat-Long file; should we still do that, or does the updated data set already incorporate this correction?

Please still use the Newtok-Mertarvik Lat-Long file.

65. Is the pro forma by project or do we have to consolidate multiple projects into the same pro forma?

Provide one pro forma per application PDPA or project area.

66. Our question relates to the required content of the Pro Forma - should it 100% be related to the project and only the project-related numbers?

Yes, it should 100% be related to the project and only the project-related numbers.

67. I am getting an error in Criterion 5 Description #1 that says I am over the character limit, but per the section, it says I am not. Can this be fixed or any suggestions?

Yes, for some reason this particular text box is returning this error. We have asked our developers to address the issue but, in the meantime, I have two suggestions:

1. Copy your text to a Word doc as plain text (no special formatting, tabs, bullets, etc) and copy that into the Criterion 5 narrative box. The problem with this is that it does not look great.
2. Type "See attached xxxxx.doc" in the narrative box and attach the information as an uploaded file.

68. As one of the requirements, there is a letter of credit commitment or a letter of bond commitment. The letter of bond commitment from one of our vendors may only cover a portion of the grant application total. Is this sufficient for the application? Does a copy of the bond have to be included? Can the contract manager provide the bond commitment?

The Letter of Credit or Performance Bond commitment must be issued by an eligible lending institution or surety company in the name of the applicant for the appropriate percentage of the total award amount requested. The percentage varies depending on the Letter of Credit or Performance Bond option chosen by the applicant.

69. Regarding the audit, all of our tribes are small and financially needy, spending less than \$1,000,000 annually, which is the federal threshold to have an audit. When forming [Applicant Entity], all of our tribes began their audit process in 2025. [Specific Tribe] is in the midst of its audit, which will not be completed until September 30, 2025. Our other tribes expect their audits to be complete sometime before September 30. [Applicant] is a startup and has no financial records yet. Our contractor will not release their audited financial statements at this time. What is our workaround for this application?

As an acceptable workaround to [Applicant] submitting its own third-party audited financial statements, [Applicant] may submit FY2024 third-party audited financial statements from 100% of the member entities. This should not be conflated with the requirement of a federal single audit, required when an entity spends \$1 million or more in federal awards in a single fiscal year.

70. Please provide a list of all impacted BSLs.

A change log for the Appendix I update can be found on the [Alaska Broadband Grant Program page](#) as *Appendix I Update Change Log (R1 07-30-25).xlsx*

71. We are wondering if the state will allow the pass-through entity [Applicant] to let the subcontractors do the performance bonding.

The Letter of Credit or Performance Bond commitment must be issued by an eligible lending institution or surety company in the name of the applicant.

72. What is the process for an applicant to add additional units for the broadband? How do we apply to get additional BDU's certified?

The BSL list is determined by the NTIA. The ABO does not have the ability to add BSLs to the map.

73. I am working on the BEAD application and was wondering if ABO plans to work this weekend?

The ABO and DCRA grants staff will be monitoring emails over the weekend and can be available to provide assistance if needed.

74. Can you please provide additional clarification on what is required to satisfy the capital investment schedule requirement from the revised FAQ #60?

Originally, the ABO required a capital investment schedule of milestones for project implementation including:

Stage 1: Workforce Readiness

Stage 2: Permitting

Stage 3: Staging and Materials Acquisition

Stage 4: Construction and Deployment

Stage 5: Operational Readiness Transition

Stage 6: Project Close-Out

The requirement for the schedule to be broken down into these six milestones has been removed. Applicants can either use the six previously provided by the ABO or an Applicant can categorize their costs based on their own project design. A capital investment schedule must be provided showing capital costs over time as they are linked to project activities, whether it is broken down into those six categories or not. The capital investment schedule needs to be detailed enough to pass a reasonable assessment by a telecom engineer reviewing it.

While the capital investment schedule evidencing complete build-out and initiation of service within four years of the date on which the entity receives the subgrant need not be certified by a professional engineer, it is still a required element of the application.

If there are any discrepancies in the language for this requirement between the NOFO and portal, the portal language takes precedence.

75. I have a clarification question regarding FAQ #66. It seems to say that the Broadband Office is requesting a pro forma with income statement, balance sheet and cash flow figures limited to project related BSLs. [Applicant] is requesting the State reconsider this. 1) It is standard practice to provide a consolidated pro forma for an organization (not split by geography or service line). [Applicant] has used a consolidated pro forma for audits, other grants, and loan purposes. 2) [Applicant] can track revenue by location, but [Applicant] does not track all expenses by location. For example, [Applicant] does not track Corporate Operations by BSL. 3) A pro forma that only shows project-related financials will not capture the full health of the organization.

Understood. Please get as close to the project level as possible. And provide an explanation in the writeup of any deviation from providing the pro forma at the project level.