

Federal Award ID Number	02-20-B066
Grant Request Number	GRN-000066
Funding Program Name	Broadband Equity Access and Deployment (BEAD) Program
Funding Request Name	Alaska-BEAD-Initial Proposal-Volume 2
Applying Organization	AK DEPARTMENT OF COMMERCE COMMUNITY ECONO
Applicant Name	Lisa Von Bargaen

02.01.01 Objectives

Outline the long-term objectives for deploying broadband; closing the digital divide; addressing access, affordability, equity, and adoption issues; and enhancing economic growth and job creation. Eligible Entities may directly copy objectives included in their Five-Year Action Plans.

The Alaska Broadband Office's overarching goal is universal broadband deployment in a manner that provides affordable access to Alaskans in all regions and communities throughout the state, from Adak to Yakutat. Providing access both in-home and through anchor institutions will be essential in achieving digital equity, especially in those communities that are currently unserved.

Goal:

Provide sufficient capacity to the unserved and underserved locations with corresponding Digital Equity training such that the current unserved and underserved individuals and communities can fully participate in the global economy and society.

Success will be measured in each community in four ways:

1. Ability of individuals and families in the communities to participate in the global economy and society.
2. Availability of affordable broadband service.
3. Ensuring an economically self-sustaining broadband infrastructure network.
4. For Priority Projects, requiring a scalable broadband infrastructure network capable of 1 Gigabit per second (Gbps) download bandwidth and 1 Gbps upload bandwidth.

Objectives:

- Develop a Digital Equity Plan to address digital equity deficiencies.
- Collaborate and coordinate with Tribal and local entities, the telecommunications industry, community anchor institutions, and the public at large to design the most strategic network to reach all unserved and underserved communities through the deployment of the BEAD subgrant program.
- Distribute BEAD funding through a competitive subgrant program for deploying broadband infrastructure to unserved and underserved communities.
- Coordinate with industry, organized labor, universities and trade programs, workforce alliances, Native Entities, local governments, economic development organizations, the Alaska Department of Labor and Workforce Development, the Governor's Office of Infrastructure, and other State agencies to develop a plan to ensure an available and qualified workforce for deployment and maintenance of broadband infrastructure.

02.02.01 Local, Tribal and Regional Broadband Planning Processes

Identify and outline steps that the Eligible Entity will take to support local, Tribal, and regional broadband planning processes or ongoing efforts to deploy broadband or close the digital divide. In the description, include how the Eligible Entity will coordinate its own planning efforts with the broadband planning processes of local and Tribal Governments, and other local, Tribal, and regional entities. Eligible Entities may directly copy descriptions in their Five-Year Action Plans.

The Department of Commerce, Community and Economic Development (DCCED) hired a Tribal Liaison in the Alaska Broadband Office to ensure the inclusion of Native entities and voices during the planning, development, and building of the broadband infrastructure to all communities and regions throughout Alaska. It is Alaska's intent to ensure that this infrastructure will be available to Alaskans residing in their traditional or rural homes at comparative prices and speeds to urban Alaska.

Alaska is home to 229 federally recognized tribes, 12 Alaska Native Claims Settlement Act (ANCSA) corporations, and over 200 village corporations from across the state. The Tribal Liaison serves as the main point of contact for all Native entities and facilitates and organizes formal and informal communications with the ABO team. The Tribal Liaison works directly with the Director to ensure the technical jargon of the broadband industry is communicated in a clear manner and pushes out information on the many funding opportunities available. The ABO has put significant emphasis on working with Alaska Native entities to ensure understanding of the unserved populations represented by each entity as this is essential in making sure that 100 percent of Alaska's communities are included in the planning and deployment process.

The Alaska Broadband Office is engaged in a robust outreach and engagement program. This outreach and engagement will continue over the BEAD program lifespan. The engagement program will ensure:

- 1) Establishment, documentation, and adherence to clear procedures to ensure transparency.
- 2) Meaningful engagement and outreach to diverse stakeholder groups including:
 - a) unserved and underserved communities, including historically underrepresented and marginalized groups and/or communities.
 - b) Community Anchor Institutions
 - c) Native Entities
 - d) Local Governments
 - e) State Agencies
- 3) Multiple participation mechanisms including newsletters, newspapers, the ABO website, direct outreach, Tribal outreach, and in-person travel to unserved and underserved regions.
 - a) The ABO has held three weekly engagement opportunities with three separate focuses:
 - i) Native entity concerns
 - ii) Infrastructure development concerns
 - iii) Access and affordability concerns

These efforts are complimentary to but separate from the Digital Equity Listening Sessions that have been held as part of the DE plan development process.

- b) Tribal Consultations:

The Tribal Liaison has been and remains responsible for leading the Tribal consultation process. The Tribal Liaison has also traveled to many statewide events both Native and Non-Native to give presentations on the ABO process as well as making presentations available online.

In the first round of tribal consultations, the ABO sent out packets that included the Dear Tribal Leader Letter (DTLL), Tribal Consultation Agenda, PowerPoint Presentation on the ABO status as well as the Capital Cost Model, Reverse Margin Operations and Maintenance Model for ongoing sustainability.

These packets were distributed to over 438 organizations inviting participation in the tribal consultations. The ABO sent out additional email reminders ahead of each upcoming event as they were spread out over a two-month span to allow for maximum participation. In the first round of Tribal Consultations, the ABO held four tribal consultations: one in-person and three online (one regional non-profit, Kawerak, hosted the tribal consultation and ensured that every community in the region could participate via Zoom). The focus of the initial tribal consultation series was to inform Native entities about the ABO's work and opportunities to engage and collaborate, and to solicit from the Native entities' information about the broadband efforts they were leading, partnerships or contracts already in place, and planning efforts already underway.

The ABO plans to hold three more tribal consultation series around the State Broadband Mapping Challenge Process, Technical Assistance on Grant Applications, and Cybersecurity – how to keep users safe. Each series will be presented in four sessions to maximize participation. The ABO has budgeted to host one out of the four sessions for each topic in-person in different regions of the State. Combining online and in-person participation is the most effective way for the ABO to increase participation and dissemination of information throughout Alaska. The ABO will send, via email and/or hard copy mail, packets of the information that includes the DTLL, agenda, PowerPoint Presentation for each session, and any other pertinent information to inform the Native entities of the subject matter that will be presented and to request participation and input. There will also be follow up emails sent to remind the Native entities of the upcoming events to ensure maximum participation. The schedule for the consultations is as follows:

1. Completed:
 - a. May 25, 2023 – Hosted as part of the Indigenous Connectivity Summit
 - b. June 2, 2023 – online
 - c. June 22, 2023 – Hosted by Bering Straits Region and Kawerak
 - d. June 29, 2023 – online
2. Alaska's State Challenge of Broadband Serviceable Locations (BSL) and Community Anchor Institutions (CAI). This Tribal Consultation will be based on how best to make challenges to the Federal Communications Commission's (FCC) Broadband Map as adopted by the National Telecommunication and Information Administration (NTIA). These will be completed by January 31, 2024.
 - a. One Hybrid of in-person and online consultation
 - b. Three online consultations
3. Technical Assistance on Grant Applications. The ABO anticipates four additional consultations to be held in the spring/early summer of 2024.
 - a. One Hybrid of in-person and online consultation
 - b. Three online consultations
4. Cybersecurity – how to keep users safe. The Alaska Broadband Office is looking to solicit feedback and provide tools to the Native entities for improving cybersecurity best practices for keeping the youth and elders safe from online scamming and human trafficking. This set of sessions will be held in late fall/early winter of 2024.
 - a. One Hybrid of in-person and online consultation
 - b. Three online consultations.

The Tribal Liaison is responsible for keeping an Excel spreadsheet on the Beneficiaries Engagement Process with the different Native entities that the ABO has been in contact with through the DTLL, phone calls, and meetings as well as updating the spreadsheet when the ABO has engaged in communication directly. This list is categorized by status (unserved, underserved, and served), by project, and by region. This is a living document that will be maintained throughout the planning, granting, and building phases of broadband deployment in Alaska.

02.03.01 Local Coordination Tracker and Description

Describe the coordination conducted, summarize the impact such coordination has on the content of the Initial Proposal, and detail ongoing coordination efforts. Set forth the plan for how the Eligible Entity will fulfill the coordination associated with its Final Proposal.

The ABO coordinated and continues to coordinate with all the interested parties for both the Broadband Equity, Access, and Deployment (BEAD) program and Digital Equity (DE) Plan efforts. The ABO is partnered with the Rasmuson Foundation (Digital Equity Administering Entity) and its subgrantees to address broadband issues concurrently by participating in statewide digital equity listening sessions. The ABO has set up weekly and bi-weekly meetings to address BEAD and Digital Equity with the members of Native organizations, industry, and the public. The ABO socializes and solicits immediate feedback on various sections of both the BEAD and DE programs. Specifically, it is a massive challenge to ensure geographic coverage of the state of Alaska. Given that the state is more than twice the size of Texas but has less than 1/42 the population and given that more than 70% of all communities are only reachable by small plane and two seasonal barges, the ABO has and will continue to have a challenge reaching out to all areas of the state. The ABO has developed different strategies to ensure that there is outreach coverage. These include traveling to individual villages, attending and engaging at conferences of the different groups such as the Alaska Municipal League, the Alaska Federation of Natives Convention, the Alaska Workforce Alliance Annual Meeting, the Alaska Workforce Investment Board quarterly meetings, and engaging at other conferences. The complete list of engagements is attached in Section 02.03.01.01.

In order to have meaningful engagement and outreach to diverse stakeholder groups, labor organizations, and community organizations, including to promote the recruitment of women and other historically marginalized populations for workforce development opportunities and jobs related to BEAD-funded eligible activities the ABO has, utilized multiple awareness and participation mechanisms and different methods to convey information and outreach. The ABO has and will continue to utilize as many strategies for communications as practical. The ABO uses its website, a list-serve of over 400 individuals, non-profit community organization and private companies as well as the over 400 Native entities (regional corporations, village corporations, Tribal governments, and non-profit organizations). Additionally, the ABO posts newsletters of upcoming events and holds three listening sessions per week for public input.

This ensures a transparency of processes, for the BEAD Initial Proposal Volume 1 and Volume 2 and the Digital Equity Plan. The ABO has completed 30-day comment periods for each. All comments have been reviewed and contemplated for inclusion in each document respectively. The ABO will publish the results to the website and send out notifications as soon as that process is completed. In addition, the ABO will do the same for the upcoming Volume 1 challenge process.

Alaska is very unique in that the majority of the unserved communities are Alaska Native Villages. While it the majority of the unserved population is within the urban areas, a truly equitable plan requires that no unserved location be left behind. This is why a significant portion of the ABO's efforts have been around tribal consultation. The ABO estimates that greater than 66% of the BEAD funding (assuming no other funding success from Alaskan applicants for Tribal Broadband Connectivity Program – TBCP – round 2, or USDA's REConnect Round 5) will be used to bridge the digital divide that prevents the 171 villages that are wholly unserved from fully participating in the digital economy.

In order to have meaningful engagement and outreach to diverse stakeholder groups, labor

organizations, and community organizations, including to promote the recruitment of women and other historically marginalized populations for workforce development opportunities and jobs related to BEAD-funded eligible activities the ABO has, utilized multiple awareness and participation mechanisms and different methods to convey information and outreach. The ABO has and will continue to utilize as many strategies for communications as practical. The ABO uses its website, a list-serve of over 400 individuals, non-profit community organization and private companies as well as the over 400 Native entities (regional corporations, village corporations, Tribal governments, and non-profit organizations). Additionally, the ABO posts newsletters of upcoming events and holds three listening sessions per week for public input.

02.03.01.01 Local Coordination Tracker Tool

As a required attachment, submit the Local Coordination Tracker Tool to certify that the Eligible Entity has conducted coordination, including with Tribal Governments, local community organizations, unions and work organizations, and other groups.

Alaska IPV2 Cure.3 Local Coordination Tracker-06-14-2024 08-39-AK DEPARTMENT OF COMMERCE COMMUNITY ECON-GRN-000066.xlsx

02.03.02 Tribal Consultation

Describe the formal tribal consultation process conducted with federally recognized Tribes, to the extent that the Eligible Entity encompasses federally recognized Tribes. If the Eligible Entity does not encompass federally recognized Tribes, note "Not applicable."

The ABO has drafted a Tribal Consultation Policy, largely based on the Tribal Consultation Policy for the Alaska Department of Health and Social Services. The ABO has attached the "Dear Tribal Leader Letter", matrix of Tribal Consultations, and the Tribal Consultation Policy in Section 02.03.02.01.

02.03.02.01 Tribal Consultation Evidence

As a required attachment only if the Eligible Entity encompasses federally recognized Tribes, provide evidence that a formal tribal consultation process was conducted, such as meeting agendas and participation lists.

Mail Tracking-Tribal Outreach (updated)-12-25-2023 02-11-AK DEPARTMENT OF COMMERCE COMMUNITY ECON-GRN-000066.pdf

Dear Tribal Leader Letter (ALL)-12-25-2023 02-11-AK DEPARTMENT OF COMMERCE COMMUNITY ECON-GRN-000066.pdf

ABO Tribal Consultation Evidence 2023-12-25-2023 02-11-AK DEPARTMENT OF COMMERCE COMMUNITY ECON-GRN-000066.pdf

2.4 Deployment Projects Subgrantee Selection Process

02.04.01 Subgrantee Selection Process Integrity

Describe a detailed plan to award subgrants to last-mile broadband deployment projects through a fair, open, and competitive process.

Alaska's Broadband Grant Program plan for awarding BEAD subgrants contains multiple elements designed to achieve a fair, open, and highly competitive award process with broad participation both by current in-state broadband providers as well as by qualified new providers. The Alaska Broadband Grant Program also includes rules that fully implement all Sub-granting Accountability Procedures mandated

by NTIA for disbursement, claw-back rights, subgrantee reporting, and ongoing monitoring. Overview of the Alaska Broadband Grant Program. To illustrate the specific ways in which the Alaska Broadband Grant Program will be a fair, open, and competitive process, the summary below provides an overview of each step. Many of these elements are described in greater detail in the following sub-sections of this response.

The Alaska Broadband Grant Program will use an overall approach of organizing the unserved (where it has sufficient funding) underserved Broadband Serviceable Locations (BSLs) into a set of Pre-Defined Project Areas (PDPA) . PDPA's require an additional information from the NTIA to be fully determined. The ABO is awaiting information from NTIA regarding the TBCP equitable distribution awards for final PDPA count. The PDPAs fall into three distinct categories. The categories of PDPA are:

1. BSLs in an urban area or on road systems (approximately 37,500 BSLs)
2. BSLs within communities, but not in an urban area or on road systems (approximately 14,000 BSLs)
3. Non-Community Based Independent BSLs (not within a community nor on a road system, approximately 20,400 BSLs)

The ABO will group the first two PDPA categories by logical community groupings. Category 3 is a single PDPA that encompasses all of the BSLs in this category.

In the application process, Categories 1 and 2 have a fiber priority, meaning if there is a fiber-only project and the competitive projects are non-fiber or a hybrid fiber/non-fiber, the fiber-only project will automatically be awarded if the average BSL cost is below the Extremely High-Cost Threshold (EHCT) for the category.

It is anticipated that no applications for Category 3 will be fiber as all locations exceed the EHCT. Prospective subgrantees will have wide flexibility to define their proposed overall deployment projects and do not need to adhere to the PDPAs. If a provider does not use the PDPA, there may be an impact section 14.A.2. of the grant scoring. By including a PDPA in an application, the provider commits to reach all included unserved and (where it has sufficient funding) underserved BSLs. In other words, the Alaska Broadband Grant Program plans to take advantage of the new availability of location-level maps to adjust and improve on traditional Census Bureau definitions in order to define a set of PDPAs that best reflect local deployment economics and geographic profiles across the state.

Alaska Broadband Grant Program will use this PDPA-based approach to ensure that the award of BEAD subgrants in Alaska both reaches all unserved and (where it has sufficient funding) underserved BSLs as well as meets BEAD's stringent requirements for a fair, open, and competitive process. Alaska is a geographically large state with approximately 85,324 (undeconflicted) unserved and (where it has sufficient funding) underserved BSLs. The ABO considered an approach of allowing providers to propose entirely custom project areas at the level of individual locations, including via a "notice of intent" process, but concluded that in Alaska this approach would create significant risks that large numbers of locations would not benefit from a truly fair, open, and competitive award process, or at worst, would receive no subgrant proposal at all.

Instead, every eligible location in Alaska will be included in a PDPA. PDPAs may include areas that are "High-Cost-Areas" and "Non-High-Cost-Areas" as defined by NTIA. For those areas in the PDPAs designated as "High-Cost Areas" it means that they have particularly challenging business cases for broadband deployment. These PDPAs will receive additional scoring weight in order to create an incentive for providers to serve these traditionally left-behind regions of the state. In addition, to

mitigate the significant climate resilience risks facing Alaska, certain mandatory infrastructure hardening requirements (such as a requirement for the use of buried fiber) will be required.

Feasible, higher cost locations that are traditionally left behind will be bundled with more desirable unserved and (where it has sufficient funding) underserved BSLs within overall PDPAs. The use of standardized PDPAs also will allow the ABO to make fair comparisons between different proposals that partially overlap; to foster competition between prospective subgrantees and therefore more reliably only award BEAD funds at the level required by a reasonable business case; and to still provide significant flexibility that will enable a wide range of providers, both small and large, to participate in the process, rather than using areas that favor only one specific entity or general type of provider.

To begin the Alaska Broadband Grant Program, the ABO will release pre-qualification requirements to interested prospective subgrantees as well as the initial proposed list of PDPAs. This information will be provided via the ABO public website, with additional outreach via email or other forms of direct communication to both providers and other local stakeholders known to the ABO via past efforts including the 430+ Native entities as well as those identified in the BEAD Five-Year Action Plan local engagement efforts. The ABO will seek public comment for 30 days on the proposed PDPA list in parallel with the Volume 1 Challenge Process 30-day BSL review. After reviewing those comments, the ABO will release the final list of PDPAs that will be used for Alaska Broadband Grant Program, with a target of doing so no later than 30 days after the end of the comment period, with notice provided using the same approach.

Prospective subgrantees will then have the opportunity to submit application(s). Application(s) may include the list of PDPAs included in the application, and must include the amount of BEAD funds requested, the proposed technology type for the project, the primary and secondary scoring application elements (including plans for affordability, fair labor practices, deployment timeline, speed of network and any other supporting information) required to comply with final NTIA rule requirements for the fixed subaward grant model that the ABO will use for the Alaska Broadband Grant Program. Note that the ABO will specify an Extremely High-Cost Per Location Threshold cost level in advance of initial applications, as the ABO strongly encourages the broad participation of non-fiber technologies and providers in BEAD given the diverse range of needs throughout the state. The application window will remain open for 16 weeks.

Applications will then be analyzed to identify any overlap between applications. All applications will be subject to review and confirmation by the state that the applicant has the requisite operational, managerial, and financial capability to fulfill the subgrant in the specific PDPAs included.

The ABO has designed the approach to address the unprecedented policy challenge posed by the BEAD program: how to reach 100% of unserved and (where it has sufficient funding) underserved BSLs via a single subgrant process with a total budget that is potentially sufficient for the task. In other words, the most important design question for the Alaska Broadband Grant Program is not “Does Alaska have enough funding based on modeling projections?” but rather “What can Alaska do to ensure that all unserved and (where it has sufficient funding) underserved BSLs attract high-quality subgrant proposals that all can be funded within the total BEAD budget?”

As a last step prior to finalizing all the initial applications, the ABO will review the overall set of awards that could be made based on these steps to assess whether 100% of unserved and (where it has sufficient funding) underserved locations would be served by either Priority or Reliable service within the available BEAD allocation budget for the state. If this assessment indicates that the level of service that

would be provided to unserved and (where it has sufficient funding) underserved BSLs could be improved, the ABO will apply the Extremely High-Cost Threshold (EHCT). In other words, Alaska proposes to implement the EHCT requirement as a process applied as an initial and final optimization tool with respect to the actual set of applications received by the state.

The ABO will then conduct a final review of selected proposals to confirm that the total set of awards to each prospective subgrantee is consistent with the financial, operational, and managerial capabilities submitted in the pre-qualification process, confidentially engaging with specific providers if needed to confirm or clarify any identified issues, and reserving the ability if necessary to select an alternative proposal if any concerns about the ability of the provider to deliver on all awards remain. After approval of the state's Final Proposal by NTIA, the ABO will implement grant award contracts that will include mandatory subgrantee accountability requirements with respect to the timing and recoverability of disbursements, reporting, and ongoing monitoring. The ABO will then publicly announce all awards selected.

Based on 3 providers indicating that they will be applying for 100% of the BSLs in Alaska, the ABO anticipates that there will be no need for a round 2.

To summarize the overall expected timeline for the Alaska Broadband Grant Program:

- a. Review of public comment on PDPA list and final PDPA list determinations concurrent with the Initial Proposal Volume 1 30-day review: 30 days.
- b. Application window: 4 months.
- c. Application processing: 3 months.

The expected end-to-end timeline through the finalization of Alaska's Broadband Grant Program subgrants: approximately 365 days.

Specific AK Broadband Grant Program elements aimed at fairness, openness, and competition. Within this overall competitive award model, the Alaska Broadband Grant Program process specifically ensures a fair, open, and competitive process through the operation of a number of rules and requirements, including:

Fairness. The Alaska Broadband Grant Program includes a broad set of safeguards to ensure a fair subgrantee selection process that is free of conflicts of interest (COI), direct or indirect collusion amongst applicants, and biased or otherwise arbitrary outcomes.

First, as a fundamental requirement under Alaska law as applicable to the Alaska Broadband Grant Program, applicants must fully disclose any real or apparent (perceived) COIs. In addition to these generally applicable Alaska requirements, the Alaska Broadband Grant Program will require attestation from prospective subgrantees that will include the acceptance of these terms. Such a conflict would arise when the "employee, any member of his/her immediate family, his or her partner...has a financial or other interest in the firm selected for award" (2 CFR 200.318). In addition to requiring such attestation from applicants, the ABO will also require state employees involved in the evaluation of subgrant applications to disclose any financial or other interest in any applicant entity and will not allow any employees with such an interest to participate in the selection of the Alaska Broadband Grant Program subgrants. Other federal regulations with which the grantee must comply are the conflict-of-interest requirements in 2 CFR 200.112 and 24 CFR 570.489(h). Conflicts of interest may be governed also by state law, or local law, or ordinance.

Based on these disclosures, the ABO reserves the right to take any appropriate mitigation steps including, if necessary, the disqualification of the entity from the Alaska Broadband Grant Program.

Second, Alaska law prohibits direct collusion between bidders or applicants for state-provided funds; these rules directly apply to the Alaska Broadband Grant Program.

In addition, the Alaska Broadband Grant Program implements several new requirements designed to mitigate the risks of indirect collusion between applicants in the form of public communication about desired service areas, funding requests, or other information that could lead to anti-competitive signaling behavior or other forms of coordination by applicants. At the commencement of the Alaska Broadband Grant Program process, for example, prospective subgrantees must certify that they will refrain from making any public communication with respect to plans for applying for specific Alaska Broadband Grant Program subgrants until the announcement of final awards, using rules modeled after the Federal Communications Commission's (FCC) prohibited communications rules for auctions. In addition, all prospective subgrantees also will agree to adhere to the specific Alaska Broadband Grant Program rule prohibiting any prospective subgrantee from publicly disclosing that it has received an award until after the ABO announces the end of the Alaska Broadband Grant Program award review.

Indeed, while the ABO will emphasize transparency prior to the beginning of the subgrantee selection process, once the process formally begins only limited information will be made available to prospective subgrantees with respect to competing applications' proposed project areas, funding requests, technology types, or other selection criteria. Simply put, once the Alaska Broadband Grant Program process begins, the ABO believes that fairest approach is to require prospective subgrantees to submit proposals based solely on their own business needs, rather than proposals that are informed by information with respect to the plans of other providers also pursuing subgrants.

As a reinforcing element for these COI and anti-collusion protections, the detailed ownership disclosure requirements will allow the ABO to police any attempts to disguise COIs or collusive behavior via the use of shell companies, indirect ownership agreements, or other avoidance strategies based on interlocking ownership structures.

Third, the Alaska Broadband Grant Program will guard against bias or arbitrary outcomes via the use of transparent, objective criteria both for the definition of PDPAs as well as for scoring and selecting winning subgrantees. For example, as described below, the Alaska Broadband Grant Program scoring rubric is strongly weighted toward objective, quantitative metrics (including for BEAD funding level, affordability, speed of deployment, local/tribal support, and speed of network for non-FTTH projects) that involve little or no qualitative scoring discretion (and therefore little risk of arbitrary outcomes). By state law, the Alaska Broadband Grant Program also includes an appeals process for scoring errors as an additional protection against arbitrary outcomes.

Openness. The Alaska Broadband Grant Program will welcome the participation of any type of provider authorized to provide broadband service in Alaska. The Alaska Broadband Grant Program scoring rubric does not favor any particular provider nor type of provider.

In addition, the Alaska Broadband Grant Program will provide public notice and transparency for all program activities up until applications are submitted, at which time only limited information will be available in order to prevent indirect collusion by applicants, and then followed by full transparency after awards are announced. For example, all detailed Alaska Broadband Grant Program application requirements and scoring rules will be made public well in advance of the application process. The ABO's initial definitions of PDPAs also will be made available prior to the start of the process, and final

PDPA definitions will be made public in advance. The ABO will also implement a series of technical assistance and application tutorial steps for prospective subgrantees prior to the start of the process, including a “mock” Alaska Broadband Grant Program opportunity for prospective subgrantees to fully familiarize themselves with the application process.

Competitiveness. The ABO designed the Alaska Broadband Grant Program to emphasize the competitiveness of subgrant awards and thereby deliver the most impact for the citizens of Alaska from the state’s BEAD allocation. First, as described above, most of the scoring elements are based on neutral criteria and are algorithmic in nature. Even qualitative scoring components such as fair labor plans flow from clear, neutral criteria that will be made public in advance of applications.

Above and beyond scoring rules, the Alaska Broadband Grant Program’s fundamental structure will heighten competition for BEAD subgrants and will allow the ABO to make objective comparisons between applications based on standardized PDPA’s.

Qualification #4: Technical Capability

Each prospective subgrantee seeking funding to deploy or upgrade a broadband network must certify that it is technically qualified to complete and operate the project and that it can carry out the funded activities in a competent manner, including that it will use an appropriately skilled and credential workforce (see Section 3.3. of this Grant Opportunity). Applicants must show specific evidence of technical capability. This will be demonstrated through the certifying of the following as part of the narrative:

A. Applicants must provide examples of previous projects of similar size and scope where work required to complete the project in a similar timeline and at a level of quality required by the BEAD program while maintaining a strong safety record and certify Prior experience executing engineering and construction work of a size, complexity, nature, and value similar to the RPA in question. Specifically, the following:

1. If a provider of voice, broadband, and/or electric transmission or distribution, certify to these facts and specify the number of years the applicant or its parent company has been operating.
2. If a provider of voice and/or broadband service, certify it has timely filed Commission Form 477s and the Broadband DATA Act submissions, if applicable, as required during this time period; that it will continue reporting as required; and that it has otherwise complied with the Federal Communication Commission’s rules and regulations.
3. An applicant should explain any pending or completed enforcement action, civil litigation, or other matter in which it failed to comply or was alleged to have failed to comply with Federal Communications Commission’s rules or regulations.
4. If the applicant has operated an electric transmission or distribution service, it must submit qualified operating or financial reports that it has filed with the relevant financial institution for the relevant time-period along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution. Acceptable submissions for this purpose will be the Rural Utilities Service (RUS) Form 7, Financial and Operating Report Electric Distribution; the RUS Form 12, Financial and Operating Report Electric Power Supply; the National Rural Utilities Cooperative Finance Corporation (CFC) Form 7, Financial and Statistical Report; the CFC Form 12, Operating Report; or the CoBank Form 7; or the functional replacement of one of these reports. See Rural Digital Opportunity Fund Order, 35 FCC Rcd at 719, n. 202.

B. Applicants New to Broadband: An applicant that is a new entrant to the broadband market, must provide a narrative description to demonstrate that the newly formed entity has obtained, through

internal or external resources, sufficient operational capabilities. The ABO shall not approve any grant for the deployment or upgrading of network facilities unless it determines that the documents submitted to it demonstrate the prospective subgrantee's operational capability with respect to the proposed project.

C. Speed of Network:

1. Bandwidth Commitment: Applicant must describe and ensure its network provides Reliable Broadband Service with speeds of not less than 100Mbps for downloads and 20Mbps for uploads and that 95% of latency measurements fall at or below 100 milliseconds (ms) round-trip time.

2. Reliability Commitment: Applicant must describe how the network will, on average, not exceed 48 hours of outage time over any 365-day period except in the case of a Force Majeure occurrence.

2.4 Deployment Projects Scoring Criteria

02.04.02 Scoring Rubric and Prioritization

Describe how the prioritization and scoring process will be conducted and is consistent with the BEAD NOFO requirements on pages 42 – 46.

A. Primary Scoring: 75% of total score.

1. Minimal BEAD Program Outlay. The total score percentage for this category is 30%. The ABO Scoring Committee will score how applicants minimize the BEAD program outlay. This includes the cost per location, connecting all BSLs in the proposed PDPA, and any matching funds for both High-Cost Areas (HCA) and non-High-Cost Areas (non-HCA). Applications will be sub-scored in this category based on the following criteria:

A.1.a. Minimal BEAD Program Outlay Per Location: subcategory A.1. will be scored based on the minimal program outlay per location. The less BEAD program outlay will receive a higher score in this subcategory:

A.1.a.i. 15 percent in HCA;

A.1.a.ii. 7.5 percent in non-HCA.

Description of the sub-scoring for section A.1.a: The score will be evaluated where the minimal BEAD program outlay per location passed will receive 100% of the available points, the highest cost per location passed will receive 0% of the available points, and all other applicants will receive a ratio of available points based off the lowest cost per location passed.

A.1.b. 100% Connections: subcategory A.2. will be scored based on whether all BSLs within a community and every community along a path are connected. If so, the applicant will receive 100% of the available points in this subcategory. If not, the applicant will receive no points in this subcategory:

A.1.b.i. 15 percent in HCA;

A.1.b.ii. 7.5 percent in non-HCA.

Description of the sub-scoring for section A.1.b.: The score will be evaluated where an applicant that connects every unserved and (where it has sufficient funding) underserved BSL within a community and every community along a path will receive 100% of the available points in this subcategory. If not, the applicant will receive no points in this subcategory.

A.1.c. Matching Funds: subcategory A.3 will be based on the size of the match. For deployment projects in HCAs, a non-federal match is not required. In areas not considered high cost, a minimum 25% non-federal match will be required from the applicant:

A.1.c.i. Zero percent in HCA (a 1% bonus will be attributed to each 1% of match);

A.1.c.ii. 15 percent in non-HCA.

Description of the sub-scoring for section A.1.c.: The score will be evaluated on the applicant's designated match. If the applicant meets the specified match, the applicant will receive 100% of the

points within this subcategory. If not, the applicant will receive no points in this subcategory. In addition, applicants can receive a 1% bonus for every 1% match above the requirement.

A.2. Affordability. The total score percentage for this category is 25%.

Applications will be scored based on the following criteria:

A.2.a Fiber projects: A \$500/month, 1Gbps/1Gbps Service, Unlimited Data. Applicants who meet the price point in this category will receive the total points. Pricing above the target will receive a ratioed reduction of scoring.

1Gbps/1Gbps Price	Affordability Scoring
\$500	100%
\$600	90%
\$700	80%
\$800	70%
\$900	60%
\$1,000	50%
\$1,100	40%
\$1,200	30%
\$1,300	20%
\$1,400	10%
\$1,500+	0%

This is a purposeful deviation from the rest of the states and territories. The ABO also recognizes there is an “up to” 2.5Gbps download/”up to” 75Mbps upload, unlimited, for \$189.99/month in many markets in Alaska. However, the requirement is that the affordability measure be 1Gbps/1Gbps symmetrical. To that end, the ABO found two publicly available sources for a 1Gbps/1Gbps service. The first is Alaska Communications “Urban Rate” developed as part of the Rural Health Care (RHC), USAC funding. The Alaska Communications monthly “Urban Rate” for 1Gbps/1Gbps is: One-year term: \$3,240, three-year term: \$2,970, and five-year term: \$2,700 (Urban Rates - Alaska Communications). The second is the GCI Terra Tariff. Similar to Alaska Communications, GCI lists their rates on a one-, three- and five-year terms, but also adds a 10- and 25-year term. Unlike Alaska Communications, GCI lists the rates on a per Megabit per second (Mbps). For convenience the ABO is listing the pricing as it appears in the Tariff and multiplied by 1,000 to gross it up to the 1Gbps/1Gbps rate. It is important to note that the TERRA system provides service to ultra-rural Alaska. TERRA monthly rates: one-year term: \$4,208,000 (\$4,208/Mbps), three-year term: \$3,740,000 (\$3,740/Mbps), five-year term: \$3,273,000 (\$3,273/Mbps), 10-year term: \$2,805,000 (\$2,805/Mbps), and 25-year term: \$2,040,000 (\$2,040/Mbps) (gci_terra_posting_effective_07_29_15_final.pdf)

OR

A.2.b. Other (Non-Fiber Projects): A \$110/month, 100Mbps/20Mbps Service, Unlimited Data. Applicants who meet the price point in this category will receive the total points. Pricing above the target will receive a ratioed reduction of scoring.

100/20Mbps Price	Affordability Scoring
\$110	100%
\$114	90%
\$118	80%
\$122	70%
\$126	60%

\$130	50%
\$134	40%
\$138	30%
\$142	20%
\$146	10%
\$150	0%

Again, this is a purposeful deviation of the NOFO's expectation of \$75/month. There are two reasons for this: First it cost far more than \$75.00/month average for 100/20Mbps. Second, using free market principles, the rate for any service, in a competitive market will fall to the level of the nearest acceptable competitor. In the case of ultra-rural Alaska evaluating the costs of service, on an incremental basis only (meaning only hiring new techs and customer service reps as needed for the new adds, and not the full stand up of a company), to get to a 12.5% margin, with an oversubscription rate of 20:1, the average monthly rate for service would need to be ~\$465. The same analysis on the 1Gbps/1Gbps service at 100% yields a price \$3,022/month. As it is to achieve a \$110.00 rate for 100/20Mbps service and a \$500.00 rate for 1000/1000Gbps service, on an incremental basis, at a 90% take rate for the slower service would require an additional incremental subsidy to the Alaska Plan/Alaska Connect Fund of \$21,000,000 (again at an oversubscription rate of 20:1. The ABO has seen that at 16:1 oversubscription, it begins to impact customer service. The ABO used 20:1 oversubscription so as to not have the impression that the ABO is trying to sway the results prejudicially. Given the startling impact of the costs in Alaska that are non-existing in the contiguous states, the ABO is left with two evaluations of the "Other" rates.

Market alternative of StarLink at \$110.00 and an evaluation of the rates using the poverty level. The rubric is the average weighted poverty annual income (\$33,256.20) x allocation of annual income dedicated to broadband related expenses (.04% in Alaska) ÷ months in a year (12) = \$110.85.

A.3. Fair Labor Practices. The total score percentage for this category is 20%.

A.3.1. Description: Applicants must provide a narrative and evidence of plans to comply with federal labor and employment laws and of plans to solicit, recruit, and retain minority-owned enterprises and women-owned enterprises (MBEs/WBEs). Applicants without a verifiable record of compliance with labor and employment law may mitigate this fact by making specific, forward-looking commitments to strong labor and employment standards and protections with respect to BEAD-funded projects.

A.3.2. Scoring: Applications that provide all the required information and certify they will comply with existing labor requirements outlined in the BEAD Notice of Funding Opportunity (NOFO) will receive 20% of the scoring. Points will be allocated based on the information submitted for each element of the fair labor category. Applications that provide no response will receive 0%.

Fair Labor Requirements

Points

A.3.2.1. Certification of compliance		
10%	A.3.2.2. Compliance with federal labor and employment laws	4%
	A.3.2.3. Disclosure of applicant violations	2%
	A.3.2.4. Disclosure of contractor and/or subcontractor violations	2%
	A.3.2.5. Wage information	
1%	A.3.2.6. Workplace safety committees	1%

B. Secondary Criterion: 25% of total score.

B.1. Speed to Deployment.

The total score percentage for this category is 10% for Priority Broadband Projects and 5% for Other Last-Mile Broadband Deployment Projects. Applicants who commit to project completion in 47 months. Applicants will receive 100% of the score if they commit to the timeline in this section. If not, all others will receive a secondary evaluation of 95% of the score.

B.2. Speed of Network and Other Technical Capabilities.

The total score percentage for this category is 0% for Priority Broadband Projects and 5% for Other Last-Mile Broadband Deployment Projects. Applicants proposing to use technologies that exhibit greater ease of scalability with no future investment funded by the ABO and whose capital assets have longer useable lives will be afforded additional weight over those proposing technologies with higher costs to upgrade and shorter capital asset cycles.

Description

Points

B.2.1. Scalability: can achieve 1Gbps/1Gbps 2.5%

B.2.2. Asset life: 20-year asset life

2.5%

B.3. Non-Traditional Providers.

The total score percentage for this category is 2.5%. Applicants that are Non-Traditional Providers such as Local Governments (including municipalities or political subdivisions, electric cooperatives, non-profits, or Tribal Governments) and utilities will receive an additional 2.5%.

B.4. Use of State of Alaska/Department of Natural Resources/Office of Project Management and Permitting.

The total score percentage for this category is 10%. Applicants who agree to use the Office of Project Management and Permitting (OPMP) within the State of Alaska (SOA) Department of Natural Resources (DNR) to assist in efficient permitting and project management will receive an additional 10%.

The ABO will first assess which PDPAs under consideration are subject to one or more proposals that:

1. constitute Priority Broadband Projects and
2. satisfy all other requirements set out in the BEAD NOFO with respect to subgrantees.

In the event there is just one proposed Priority Broadband Project in a location or set of locations, the application meets all of the gating criteria, the application proposes to serve every location in the PDPA, and the application does not exceed the ABO's Extremely High Cost Per Location Threshold (EHCPLT), that application is the default winner, unless the ABO requests, and the Assistant Secretary grants, a waiver allowing the ABO to select an alternative project.

To the extent there are multiple proposals in a location or set of locations that

1. constitute Priority Broadband Projects and
2. satisfy all other requirements with respect to subgrantees, the ABO must competitively select a project based on the criteria set by the BEAD NOFO and described in Section 2.4.2.1.

If no applications meeting the criteria for a Priority Broadband Project are submitted or all applications that are Priority Broadband Projects exceed the EHCPLT, the ABO will first consider whether to waive the EHCPLT and then consider applications that meet the minimum criteria that are not Priority Broadband Projects.

In deciding among competing projects that are not Priority Broadband Projects covering the same PDPA, the ABO will use the same scoring criteria for Priority Broadband Projects as outlined in Section 2.4.2.1.

Where practical, each PDPA will be scored independent of other PDPA's.

02.04.02.01 Scoring Rubric and Prioritization

As a required attachment, submit the scoring rubric to be used in the subgrantee selection process for deployment projects. Eligible Entities may use the template provided by NTIA, or use their own format for the scoring rubric.

02.04.03 Prioritization of Projects

Describe how the proposed subgrantee selection process will prioritize Unserved Service Projects in a manner that ensures complete coverage of all unserved locations prior to prioritizing Underserved Service Projects followed by prioritization of eligible CAIs.

The ABO will focus on serving the Unserved locations first. Where there are BSLs within a PDPA that are both unserved and underserved, applicants may submit multi-tiered applications proposing to provide service to unserved and underserved locations; or unserved, underserved, and community anchor institution locations. Multi-tiered applications should be submitted with underserved locations and community anchor institutions as additive alternates to the main project providing service to unserved locations. The project will be evaluated on the merits of service to unserved locations. If 100 percent coverage of unserved locations in Alaska is achieved in application submittals and funds remain, awards for underserved locations will be considered, followed by awards for community anchor institutions. Projects will initially be awarded partial funding for unserved locations only. Additional partial awards may be granted for underserved, and community anchor institution portions of projects, depending on remaining program funds.

02.04.04 Prioritization of CAIs

If proposing to use BEAD funds to prioritize non-deployment projects prior to, or in lieu of the deployment of services to eligible CAIs, provide a strong rationale for doing so. If not applicable to plans, note "Not applicable."

No. The ABO will not prioritize non-deployment projects over Community Anchor Institutions (CAI). Further, within the CAI category, if funding is available for CAIs, the broadband office will use the following prioritization for CAIs:

1. Healthcare Facilities
2. Educational Institutions/Libraries
3. Public Safety Entities
4. State, Tribal, or Local Government Locations
5. Public Housing Organizations
6. Community Support Organizations

02.04.05 Subgrantee EHP and BABA Requirements

The proposed subgrantee selection process is expected to demonstrate to subgrantees how to comply with all applicable Environmental and Historic Preservation (EHP) and Build America, Buy America Act (BABA) requirements for their respective project or projects. Describe how the Eligible Entity will communicate EHP and BABA requirements to prospective subgrantees, and how EHP and BABA requirements will be incorporated into the subgrantee selection process.

The ABO will adhere to the National Environmental Policy Act (NEPA) (42 U.S.C. § 4321 et seq.) and National Historic Preservation Act (NHPA) (54 U.S.C. § 300101 et seq.) requirements to analyze the potential environmental impacts of awardee projects and other eligible activities that are seeking to utilize BEAD funding. Communication between the ABO and applicants prior to and throughout the selection process will ensure entities seeking to capitalize on BEAD funding comply with NEPA and NHPA.

Specifically, the ABO will highlight:

1. Projects or other eligible activities containing construction and/or ground-disturbing activities are required to submit all required environmental documentation to NTIA with their Final Proposals, which also must describe how they will comply with applicable environmental and national historical preservation requirements.
2. It is the State of Alaska and subgrantee's responsibility to obtain all necessary federal, state, tribal, and local governmental permits, and approvals necessary for the proposed work to be conducted.
3. Projects and other eligible activities are expected to be designed so that they minimize the potential for adverse impacts on the environment.

The ABO will incorporate the requirements of the National Environmental Policy Act (NEPA) (42 U.S.C. § 4321 et seq.) and National Historic Preservation Act (NHPA) (54 U.S.C. § 300101 et seq.) into the subgrantee selection process by posting a list of regulations on the ABO website and including the requirements in grant applications/instructions as well as contract negotiation records, grant agreement terms/conditions and subrecipient grant program and/or fiscal monitoring requirements. Projects that fail to comply with EHP regulations will not be considered to receive BEAD funding.

For the BEAD Program the ABO will require subgrantees to follow BABA rules as they exist today or if they are amended in the future.

The ABO will communicate requirements stipulated in the Build America, Buy America Act (BABA) to all applicants prior to the selection process. The ABO will specifically communicate the following information:

1. Requirement that all iron, steel, manufactured products (including but not limited to fiber-optic communications facilities), and construction materials used in the project or other eligible activities are produced in the United States unless a waiver is granted.
2. In determining whether a product is produced in America, subrecipients must comply with definitions included in Section 70912 of the Build America, Buy America Act, which provides that a manufactured product is considered produced in the United States if the manufactured product was manufactured in the United States and the cost of the components of the manufactured product that are mined, produced, or manufactured in the United States is greater than 55 percent of the total cost of all components of the manufactured product, unless another standard for determining the minimum amount of domestic content of the manufactured product has been established under applicable law or regulation.
3. In addition to the provisions above, subgrantees may not use BEAD funding to purchase or support any covered communications equipment or service, as defined in Section 9 of the Secure and Trusted Communications Networks Act of 2019 (47 U.S.C. § 1608).

4. The Infrastructure Act expressly prohibits subgrantees from using BEAD funding to purchase or support fiber optic cable and optical transmission equipment manufactured in the People's Republic of China unless a waiver of this requirement is received from the Assistant Secretary.

The ABO will incorporate the requirements of the Build America, Buy America Act into the subgrantee selection process by posting a list of regulations on the ABO website, and including the requirements in grant applications/instructions as well as grant agreement terms/conditions and subgrantee grant monitoring program requirements. Any application that does not show intent to abide by BABA or explicitly violates the requirements will not be considered to receive BEAD funding.

02.04.06 Project Area Definition

Describe how the Eligible Entity will define project areas from which they will solicit proposals from prospective subgrantees. If prospective subgrantees will be given the option to define alternative proposed project areas, describe the mechanism for de-conflicting overlapping proposals to allow for like-to-like comparisons of competing proposals.

The Alaska Broadband Grant Program will use an overall approach of organizing the unserved and (where it has sufficient funding) underserved Broadband Serviceable Locations (BSLs) into a set of Pre-Defined Project Areas (PDPA). The PDPAs fall into three distinct categories. The categories of PDPA are:

1. BSLs in an urban area or on road systems (approximately 37,500 BSLs)
2. BSLs within communities, but not in an urban area or on road systems (approximately 14,000 BSLs)
3. Non-Community Based Independent BSLs (not within a community nor on a road system) (approximately 20,400 BSLs)

The ABO will group the first two PDPA categories by logical community groupings as defined by the DCRA within the State of Alaska's Department of Commerce, Community, and Economic Development (DCCED), with the third category being a single PDPA that encompasses all of the BSLs that are non-community based.

In the application process, categories 1 and 2 have a fiber priority, meaning if there is a fiber-only project and the competitive projects are non-fiber or a hybrid fiber/non-fiber, the fiber-only project will automatically be awarded if the average BSL cost is below the Extremely High-Cost Per Location Threshold (EHCPLT) for the category. It is anticipated that no applications for category 3 will be fiber as all locations exceed the EHCPLT.

In the case of overlapping proposals in category 1 and 2, the winning application will be the one that scores the cumulative highest in the primary and secondary categories combined. In the case of a tie, the applications that covers the highest number of BSLs and has the minimal BEAD program outlay per BSL passed.

In category 3, If there are multiple applicants in this category, and if there is a tie after the selection process, the sole tie breaker will be the applicant with the lowest cost per BSL

02.04.07 Coverage for Locations with No Proposals

If no proposals to serve a location or group of locations that are unserved, underserved, or a combination of both are received, describe how the Eligible Entity will engage with prospective

subgrantees in subsequent funding rounds to find providers willing to expand their existing or proposed service areas or other actions that the Eligible Entity will take to ensure universal coverage.

The ABO considers this requirement moot as the ABO has already received notification that three providers will be bidding on 100% of the Unserved and Underserved BSLs in Alaska. That being written, if, after soliciting proposals, the ABO has received no proposals to serve a location or group of locations that are unserved, underserved, or a combination unserved and underserved, the ABO will engage with existing providers and/or other prospective subgrantees to find providers willing to expand their existing or proposed service areas. In this circumstance, the ABO will work to ensure that its approach is as transparent as possible. For the avoidance of doubt, this provider/other prospective subgrantee specific outreach will only be attempted after the ABO has solicited proposals and failed to obtain one or more proposals to serve the location or locations at issue.

Specific process to secure a prospective subgrantee to serve a PDPA or sub PDPA with a reliable broadband technology with no bids in the first round:

1. Following the close of the Alaska Broadband Grant Program application window, the ABO will post a list of BSLs that received no applications on its website and will, in the manner described in Section 2.4.1., conduct general outreach to all potential subgrantees to ensure they are aware of the BSLs in question.
2. The ABO will also conduct targeted individual outreach to any provider that applied for other BSLs within the PDPA or adjacent PDPA to make them aware of the opportunity. To the extent that there is a successful subgrantee, the ABO will also conduct targeted individual outreach to these entities.
3. The ABO will give prospective subgrantees that are potentially interested in serving these PDPAs or BSLs a defined number of business days to request a one-on-one meeting with the ABO to discuss the opportunity to serve the PDPA or BSLs.
4. During these one-on-one meetings, the ABO would discuss any potential inducements the ABO may offer, such as inducements local governments, communities, or other private entities may be able to offer, including those that are financial in nature, those related to permitting or easement access, or those related to the assessment of any local taxes. Any inducements offered will be specific to the PDPA in question. Inducements may cover all locations in an PDPA, or a subset of locations and it may be possible that for any given PDPA, no inducements are available.
5. If one, or if multiple, valid potential subgrantees offering a reliable broadband technology solution become interested, the ABO will conduct a back-and-forth negotiation process for the PDPAs or BSLs without bids to solicit offers and make counteroffers to ensure the best application is selected. The ABO may also consider an additional round of bidding.
6. Following negotiations with interested potential subgrantees, the ABO will require the selected subgrantee to submit the application information, including technical information, for review and approval before a formal award is made.
7. If negotiations are not successful and the ABO has exhausted all options for reliable technology alternatives, the ABO will review and follow forthcoming guidance on alternative technologies.

02.04.08 Deployment Project Tribal Consent

Describe how the Eligible Entity intends to submit proof of Tribal Governments' consent to deployment if planned projects include any locations on Tribal Lands.

Contingent on the approval of ABO's waiver request submitted on August 29, 2024, ABO proposes to seek and obtain Tribal consent in Alaska as follows.

To the extent a potential subgrantee's proposed BEAD-funded project includes plans to deploy broadband to Unserved Service Projects or Underserved Service Projects on lands owned by a tribal entity, ABO will require that entity to submit substantial evidence (for example tribal or corporate resolution, easement, license, or letter of approval) such tribal entity consents to the proposed project. As used here, a "tribal entity" includes a Tribal Government, a Tribal Organization, or an Alaska Native Corporation. To the extent ABO provisionally selects and includes any such projects in its Final Proposal, ABO will submit the relevant evidence of such tribal consent to NTIA in its Final Proposal. For any BEAD-funded deployment projects in the Metlakatla Reservation, ABO will require a Resolution of Consent from the Metlakatla Reservation's Tribal Government.

In addition, prior to filing an application, Applicants are required to contact, and show proof of contact or attempted contacts, with 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. And, if awarded, continue communication throughout the project. At a minimum, the exchange must include what was shared and any questions the Tribe(s) had and the responses to those questions. If an Applicant is unable to contact a Tribe, the applicant must show the multiple ways in which it attempted to contact the Tribe and explain why each was unsuccessful.

The Alaska Broadband Grant Program:

Criterion 11. Indian Tribe Resolution of Support

[1,000-character limit plus one attached resolution per landowner (using template provided in Appendix J)]

To the extent the State of Alaska's Final Proposal includes plans to deploy broadband to Unserved Service Projects or Underserved Service Projects on lands owned by a tribal entity, the State of Alaska is required to submit proof of consent from each tribal entity upon whose lands, owned by a tribal entity, the infrastructure will be deployed. Each Applicant is required to obtain the necessary proof of consent on behalf of the State of Alaska. In addition, prior to filing an application Applicants are 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. And, if awarded, continue communication throughout the project. At a minimum, the exchange must include what was shared and any questions the Tribe(s) had and the responses to those questions. If an Applicant is unable to contact a Tribe, the applicant must show the multiple ways in which it attempted to contact the Tribe and explain why each was unsuccessful.

02.04.09 Extremely High Cost Per Location Threshold Identification

Identify or outline a detailed process for identifying an Extremely High Cost Per Location Threshold to be utilized during the subgrantee selection process. The explanation must include a description of any cost models used and the parameters of those cost models, including whether they consider only capital expenditures or include operational costs for the lifespan of the network.

Beginning with Alaska's allocation of \$1,017,139,672.42 and removing the 2% administration fee, and the \$5,000,000.00 Planning Grant Funding the net allocation to Alaska is \$991,796,878.97. All unserved and (where there is sufficient funding) underserved must be served as an outcome of the BEAD Program. To accomplish this the ABO has developed three categories.

Category 1: Locations that either are on a road system or already have middle-mile fiber. The EHCPLT for Category 1 is \$6,667.00/BSL. With the match requirement of 25%, the number is reduced to

\$5,000.00/BSL.

Category 2: Locations within a rural community not on a road system or already have middle-mile fiber. The EHCPLT in \$10,000.00/BSL. With the match requirement of 25%, the number is reduced to \$7,500.00/BSL.

Category 3: Non-Community or Fiber/Road based locations. All the BSLs in category 3 will be considered EHCPLT BSLs in that it is estimated that it would be greater than \$500,000/location in capital expenditures (capex) to build to any individual location with fiber infrastructure. Based on the interested non-fiber vendors' input, on a capex-only basis the ABO has determined that for category 3, using non-fiber infrastructure, the EHCPLT amount is \$6,667.00/BSL. With the match requirement of 25%, the number is reduced to \$5,000.00/BSL

In addition to the EHCPLT, for rural communities there is an additional mileage amount (additional amount) that is based on the mileage distance from the rural community to the nearest fiber interconnection. The amount is contemplated using a serial connection in the PDPA to the next community between the end community and the nearest fiber interconnection.

While the initial EHCPLT per BSL amount for each of the categories will be published, the "additional amount" will not be published. The "additional amounts" for each PDPA will be added to the cumulative per BSL EHCPLT totals. This then will create the final High-Cost Threshold per PDPA.

Those PDPAs that have zero mileage between the communities and the nearest fiber interconnect will have no "additional amount".

02.04.10 Extremely High Cost Per Location Threshold Process

Outline a plan for how the Extremely High Cost Per Location Threshold will be utilized in the subgrantee selection process to maximize the use of the best available technology while ensuring that the program can meet the prioritization and scoring requirements set forth in Section IV.B.6.b of the BEAD NOFO. The response must describe:

- a. The process for declining a subgrantee proposal that exceeds the threshold where an alternative technology is less expensive.
- b. The plan for engaging subgrantees to revise their proposals and ensure locations do not require a subsidy that exceeds the threshold.
- c. The process for selecting a proposal that involves a less costly technology and may not meet the definition of Reliable Broadband.

The State of Alaska is committed to Internet for All. To accomplish this with the allocation of \$1,017,139,672.42, the State has developed mathematical models that operate on a sliding scale to maximize the fiber and still connect 100% of the unserved locations at 100/20 Mbps.

- a. If an applicant applies for a PDPA within a category and it exceeds the EHCT as defined in 2.04.09, the application may be rejected and the PDPA may move to a different category with a lower technology threshold EHCT.
- b. The ABO will publish the expected EHCPLT for each category 30days prior to the application program opening. The additional amounts will be socialized, but not enumerated.

Additional applicant revision opportunity post-submission will not be allowed.

The ABO reserves the right to, based on new deconfliction information coming in, modify the EHCPLT number after grant submissions.

The ABO sent a letter to the NTIA, prior to the allocation of BEAD funding, showing that Alaska needed approximately \$1.9Billion for full infrastructure build out in Alaska. The NTIA allocated just over 1Billion. That fraction leaves no room for gaming the EHCPLT.

c. If necessary, the locations with non-fiber applicants will be allocated to the state-wide applicants who will be providing service with technology that may not meet the definition of reliable broadband.

d. If there are no valid applicants to cover certain BSLs, the State of Alaska reserves the right to negotiate for coverage of those BSLs after the grant application period has ended.

02.04.11 Deployment Subgrantee Qualifications: Financial Capability

Describe how the Eligible Entity will ensure prospective subgrantees deploying network facilities meet the minimum qualifications for financial capability as outlined on pages 72 – 73 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

a. Detail how the Eligible Entity will require prospective subgrantees to certify that they are qualified to meet the obligations associated with a Project, that prospective subgrantees will have available funds for all project costs that exceed the amount of the grant, and that prospective subgrantees will comply with all Program requirements, including service milestones. To the extent the Eligible Entity disburses funding to subgrantees only upon completion of the associated tasks, the Eligible Entity will require each prospective subgrantee to certify that it has and will continue to have sufficient financial resources to cover its eligible costs for the Project until such time as the Eligible Entity authorizes additional disbursements.

b. Detail how the Eligible Entity plans to establish a model letter of credit substantially similar to the model letter of credit established by the FCC in connection with the Rural Digital Opportunity Fund (RDOF).

c. Detail how the Eligible Entity will require prospective subgrantees to submit audited financial statements.

d. Detail how the Eligible Entity will require prospective subgrantees to submit business plans and related analyses that substantiate the sustainability of the proposed project.

a. Section III.A.4. (Minimum Qualification Item #3) of Alaska’s Grant Program requires applicants to show specific evidence of financial capability to undertake the construction and deployment of infrastructure and operate and maintain the infrastructure over its complete lifespan. The application requirements include descriptions of how:

1. They are financially qualified to meet the obligations associated with their proposed project.
2. They will have available funds for all project costs that exceed the amount of the grant.
3. They will comply with all BEAD Program requirements and identified service milestones.
 - a. Stage 1: Permitting
 - b. Stage 2: Staging and Materials Acquisition
 - c. Stage 3: Workforce Readiness
 - d. Stage 4: Construction & Deployment

- e. Stage 5: Project Close-Out & Operational Readiness Transition
- 4. They have, and will continue to have, sufficient financial resources to cover eligible costs for the project in between authorized grant disbursements.
- 5. During each milestone stage of the project(s), the subgrantee will need re-affirm their financial qualification to continue the project(s).

b. Required Attachment No. 3 of Section III in Alaska's Grant Program requires prospective subgrantees to submit a letter from a bank or credit union committing to issue an Irrevocable Standby Letter of Credit as part of the application package. The commitment letter must be submitted using a template provided by the Alaska Broadband Office. Alternatively, applicants may submit a letter from a company holding a certificate of authority as an acceptable surety on federal bonds committing to issue a performance bond to the applicant. If a potential subgrantee is submitting more than one application, the potential subgrantee may choose to submit 1) a commitment letter for either a letter of credit or performance bond covering the appropriate percentage of the combined value of all projects, or 2) separate commitment letters for letters of credit or performance bonds covering the appropriate percentage of each individual application.

Section IV.A. of Alaska's Grant Program requires subgrantees to submit an Irrevocable Standby Letter of Credit (LOC) issued by a bank, or a credit union, using a template provided by the Alaska Broadband Office. The template, prepared by the Department of Law within the State of Alaska, will ensure the LOC is substantially similar to the LOC established by the FCC in connection with the Rural Digital Opportunity Fund (RDOF). Applicants may choose to submit a performance bond in lieu of a LOC. Depending on the option chosen by the applicant, the LOC must be equal to 10% or 25% of the value of the project. The performance bond must be equal to 10% or 100% of the value of the project, also dependent on the option chosen by the applicant. The LOC(s) or performance bond(s) must be submitted prior to issuance of any subgrant.

If a potential subgrantee is submitting more than one application, the potential subgrantee may choose to submit 1) a single LOC or performance bond covering the appropriate percentage of the combined value of all projects, or 2) separate LOCs or performance bonds covering the appropriate percentage of each individual application.

c. Required Attachment No. 4 of Section III in Alaska's Grant Program requires prospective subgrantees to submit audited financial statements as follows:

As part of the application each prospective subgrantee shall submit financial statements from the prior fiscal year that are audited by an independent certified public accountant. If the audit includes findings, the prospective subgrantee shall provide a written summary with the audit, signed by the prospective subgrantee's chief financial officer, describing the implementation of all mitigation actions addressing the findings. If a potential subgrantee has not been audited during the ordinary course of business, in lieu of submitting audited financial statements, the potential subgrantee shall submit: 1) unaudited financial statements from the prior year; 2) certification (on a form provided by the ABO) that it will provide financial statements audited by an independent certified public accountant by a deadline agreed upon by the ABO; and 3) a letter of engagement from a certified public accountant confirming the audit will be complete by the date certified by the potential subgrantee. No subgrant agreement shall be approved by the ABO until it determines the documents submitted demonstrate the prospective grantee's financial capability with respect to the proposed project.

d. Required Attachments Nos. 5 and 6 of Section III in Alaska's Grant Program requires prospective

subgrantees to submit a Pro Forma, and Revenue and Expense Analysis as follows:

Evidence is required showing the applicant can sustainably operate the funded network and provide the committed service over the lifetime of the asset. Evidence shall be provided through a pro forma showing revenue covering expenses and capital maintenance/upgrades, demonstration of commitment by company with long-term operating history and financial stability, or other comparable methods.

A revenue and expense analysis, including transportation costs, must be provided to demonstrate that the funded project can be sustainably operated for the expected lifetime of the Asset.

02.04.11.01 Deployment Subgrantee Qualifications: Financial Capability

Submit application materials related to the BEAD subgrantee selection process, such as drafts of the Requests for Proposals for deployment projects, and narrative to crosswalk against requirements in the Deployment Subgrantee Qualifications section.

02.04.12 Deployment Subgrantee Qualifications: Managerial Capability

Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for managerial capability as outlined on pages 73 – 74 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to submit resumes for key management personnel.
- b. Detail how it will require prospective subgrantees to provide a narrative describing their readiness to manage their proposed project and ongoing services provided.

Section III.A.3 of Alaska's Grant Program (MQ Item #10) requires applicants to demonstrate Organizational and Managerial Capability as follows:

Applicants must demonstrate proof of organizational and managerial capability with respect to the proposed project and its ongoing operational integrity.

Each prospective subgrantee must provide a narrative describing the prospective subgrantee's readiness to manage:

1. the proposed broadband deployment project; and
2. broadband network operations and maintenance post project completion.
 - a. List all key project personnel and include their name, organization, position title, project role, brief bio, and percentage of full-time-equivalent (FTE) to be dedicated to the project. Full resumes of each key personnel member must be provided in addition to the narrative.
 - b. Describe the experience and qualifications of key project personnel for undertaking this project, its experience undertaking projects of similar size and scope, and relevant organizational policies.
 - c. Include a list of project partners including their name, a brief description of each organization, and their role with the project.

- d. This section should also include a narrative describing any recent or upcoming organizational changes including mergers and acquisitions with any corporate parent, subsidiary, and affiliate relationships as demonstrated in the first Organizational Chart provided as per the Required Attachment section of this document.
- e. This section should also outline compliance with Occupational Health Requirements.
- f. Plan for Establishment of a Worker-led Safety Committee.
- g. 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.
- h. Identify if the SOA/DNR/OPMP will be used to assist in efficient permitting and project management.

The ABO will not approve any grant for deployment or network facility upgrades until the prospective subgrantee has demonstrated organizational and managerial capability with respect to the proposed project and its ongoing operational integrity. The ABO reserves the option to require prospective subgrantees to agree to special grant conditions relating to maintaining the validity of representation a prospective subgrantee has made regarding its organizational structure and key personnel.

02.04.13 Deployment Subgrantee Qualifications: Technical Capability

Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for technical capability as outlined on page 74 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to certify that they are technically qualified to complete and operate the Project and that it is capable of carrying out the funded activities in a competent manner, including that it will use an appropriately skilled and credentialed workforce.
- b. Detail how the Eligible Entity will require prospective subgrantees to submit a network design, diagram, project costs, build-out timeline and milestones for project implementation, and 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, all certified by a professional engineer, stating that the proposed network can deliver broadband service that meets the requisite performance requirements to all locations served by the Project.

a. Section III.A.7.B. of Alaska's Grant Program (MQ Item #10) requires applicants to demonstrate compliance as follows:

Each applicant must demonstrate that it can carry out funded activities in a competent manner in compliance with all applicable Federal, State, and local laws. Applicants shall submit a narrative demonstrating the ability to comply with laws. This should include details about the applicant's experience in this area, ongoing monitoring process throughout the life of the project, and identification of staff or consulting assistance that will be responsible for compliance monitoring of Federal, State, and local laws.

b. Section III.A.3. of Alaska's Grant Program (MQ Item #2) requires applicants to submit a Plan for the

Establishment of a Worker-led Safety Committee. The Plan must include provisions for the applicant's management team to meet with the Worker-led Safety Committee upon request.

02.04.14 Deployment Subgrantee Qualifications: Compliance with Laws

Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for compliance with applicable laws as outlined on page 74 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to demonstrate that they are capable of carrying out funded activities in a competent manner in compliance with all applicable Federal, State, Territorial, and local laws.
- b. Detail how the Eligible Entity will require prospective subgrantees to permit workers to create worker-led health and safety committees that management will meet with upon reasonable request.

a. Section III.A.7.B. of Alaska's Grant Program (MQ Item #10) requires applicants to demonstrate compliance as follows:

Each applicant must demonstrate that it can carry out funded activities in a competent manner in compliance with all applicable Federal, State, and local laws. Applicants shall submit a narrative demonstrating the ability to comply with laws. This should include details about the applicant's experience in this area, ongoing monitoring process throughout the life of the project, and identification of staff or consulting assistance that will be responsible for compliance monitoring of Federal, State, and local laws.

b. Section III.A.3. of Alaska's Grant Program (MQ Item #2) requires applicants to submit a Plan for the Establishment of a Worker-led Safety Committee. The Plan must include provisions for the applicant's management team to meet with the Worker-led Safety Committee upon request.

02.04.15 Deployment Subgrantee Qualifications: Operational Capability

Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for operational capability as outlined on pages 74 – 75 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to certify that they possess the operational capability to qualify to complete and operate the Project.
- b. Detail how the Eligible Entity will require prospective subgrantees to submit a certification that they have provided a voice, broadband, and/or electric transmission or distribution service for at least the two (2) consecutive years prior to the date of their application submission or that they are a wholly owned subsidiary of such an entity and attest to and specify the number of years the prospective subgrantee or its parent company has been operating.

c. Detail how the Eligible Entity will require prospective subgrantees that have provided a voice and/or broadband service, to certify that it has timely filed Commission Form 477s and the Broadband DATA Act submission, if applicable, as required during this time period, and otherwise has complied with the Commission's rules and regulations.

d. Detail how the Eligible Entity will require prospective subgrantees that have operated only an electric transmission or distribution service, to submit qualified operating or financial reports, that it has filed with the relevant financial institution for the relevant time period along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution.

e. In reference to new entrants to the broadband market, detail how the Eligible Entity will require prospective subgrantees to provide evidence sufficient to demonstrate that the newly formed entity has obtained, through internal or external resources, sufficient operational capabilities.

Applicants must show specific evidence of operational capability. This will be demonstrated through the certifying of the following as part of the narrative:

1. Applicants with Two or More Years-of Experience in Alaska

a. An applicant that has provided a voice, broadband, and/or electric transmission or distribution service in Alaska for at least the two consecutive years prior to the date of its application submission or that is a wholly owned subsidiary of such an entity, must certify the following:

i. If a provider of voice, broadband, and/or electric transmission or distribution, certify to these facts and specify the number of years the applicant or its parent company has been operating.

ii. If a provider of voice and/or broadband service, certify it has timely filed Commission Form 477s and the Broadband DATA Act submissions, if applicable, as required during this time-period; that it will continue reporting as required; and that it has otherwise complied with the Federal Communication Commission's rules and regulations.

iii. An applicant should explain any pending or completed enforcement action, civil litigation, or other matter in which it failed to comply or was alleged to have failed to comply with Federal Communications Commission's rules or regulations.

iv. If the applicant has operated an electric transmission or distribution service, it must submit qualified operating or financial reports that it has filed with the relevant financial institution for the relevant time-period along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution. Acceptable submissions for this purpose will be the Rural Utilities Service (RUS) Form 7, Financial and Operating Report Electric Distribution; the RUS Form 12, Financial and Operating Report Electric Power Supply; the National Rural Utilities Cooperative Finance Corporation (CFC) Form 7, Financial and Statistical Report; the CFC Form 12, Operating Report; or the CoBank Form 7; or the functional replacement of one of these reports. See Rural Digital Opportunity Fund Order, 35 FCC Rcd at 719, n. 202.

2. Applicants New to Broadband

a. An applicant that is a new entrant to the broadband market, must provide a narrative description to demonstrate that the newly formed entity has obtained, through internal or external resources, sufficient operational capabilities.

The ABO shall not approve any grant for the deployment or upgrading of network facilities unless it determines that the documents submitted to it demonstrate the prospective subgrantee's operational capability with respect to the proposed project.

02.04.16 Deployment Subgrantee Qualifications: Ownership

Describe how the Eligible Entity will ensure that any prospective subgrantee deploying network facilities meets the minimum qualifications for providing information on ownership as outlined on page 75 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to provide ownership information consistent with the requirements set forth in 47 C.F.R. § 1.2112(a)(1)-(7).

Required Attachment No. 13 of Section III in Alaska's Grant Program requires prospective subgrantees to submit an Ownership Certification Form (consistent with the requirements set forth in 47 C.F.R. § 1.2112(a)(1)-(7)) as follows:

Each application to participate in competitive bidding (i.e., short-form application (see 47 CFR 1.2105)), or for a license, authorization, assignment, or transfer of control shall fully disclose the following:

- a. List the real party or parties in interest in the applicant or application, including a complete disclosure of the identity and relationship of those persons or entities directly or indirectly owning or controlling (or both) the applicant;
- b. List the name, address, and citizenship of any party holding 10 percent or more of stock in the applicant, whether voting or nonvoting, common, or preferred, including the specific amount of the interest or percentage held;
- c. List, in the case of a limited partnership, the name, address, and citizenship of each limited partner whose interest in the applicant is 10 percent or greater (as calculated according to the percentage of equity paid in or the percentage of distribution of profits and losses);
- d. List, in the case of a general partnership, the name, address, and citizenship of each partner, and the share or interest participation in the partnership;
- e. List, in the case of a limited liability company, the name, address, and citizenship of each of its members whose interest in the applicant is 10 percent or greater;
- f. List all parties holding indirect ownership interests in the applicant as determined by successive multiplication of the ownership percentages for each link in the vertical ownership chain, that equals 10 percent or more of the applicant, except that if the ownership percentage for an interest in any link in the chain exceeds 50 percent or represents actual control, it shall be treated and reported as if it were a 100 percent interest; and
- g. List any FCC-regulated entity or applicant for an FCC license, in which the applicant or any of the parties identified in paragraphs (a)(1) through (a)(5) of this section, owns 10 percent or more of stock, whether voting or nonvoting, common or preferred. This list must include a description of each such entity's principal business and a description of each such entity's relationship to the applicant (e.g., Company A owns 10 percent of Company B (the applicant) and 10 percent of Company C, then Companies A and C must be listed on Company B's application, where C is an FCC licensee and/or license applicant).

02.04.17 Deployment Subgrantee Qualifications: Public Funding

Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for providing information on other public funding as outlined on pages 75 – 76 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to

the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how it will require prospective subgrantees to disclose for itself and for its affiliates, any application the subgrantee or its affiliates have submitted or plan to submit, and every broadband deployment project that the subgrantee or its affiliates are undertaking or have committed to undertake at the time of the application using public funds.
- b. At a minimum, the Eligible Entity shall require the disclosure, for each broadband deployment project, of:
 - (a) the speed and latency of the broadband service to be provided (as measured and/or reported under the applicable rules),
 - (b) the geographic area to be covered,
 - (c) the number of unserved and underserved locations committed to serve (or, if the commitment is to serve a percentage of locations within the specified geographic area, the relevant percentage),
 - (d) the amount of public funding to be used,
 - (e) the cost of service to the consumer, and
 - (f) the matching commitment, if any, provided by the subgrantee or its affiliates.

Section III.A.7.A of Alaska's Grant Program requires the disclosure of other public funding as follows:

Applicants are required to disclose for itself, for its affiliates, or any eligible entity partner under the Tribal Broadband Connectivity Program (TBCP), any application the subgrantee, its affiliates, or eligible entity partner under the TBCP have submitted or plan to submit, and every broadband deployment project that the subgrantee or its affiliates are undertaking or have committed to undertake at the time of the application using public funds, including but not limited to funds provided under: the Families First Coronavirus Response Act (Public Law 116-127; 134 Stat. 178); the CARES Act (Public Law 116-136; 134 Stat. 281); the Consolidated Appropriations Act, 2021 (Public Law 116-260; 134 Stat. 1182); the American Rescue Plan of 2021 (Public Law 117-2; 135 Stat. 4); the Infrastructure, Investment and Jobs Act of 2021 (Public Law 117-58; 135 Stat. 429); any federal Universal Service Fund high-cost program (e.g., Alaska Plan, CAF), or any State or local universal service or broadband deployment funding program.

Prospective subgrantees shall disclose for each broadband deployment project:

- a. the speed and latency of the broadband service to be provided (as measured and/or reported under the applicable rules),
- b. the geographic area to be covered,
- c. the number of unserved and underserved locations committed to serve (or, if the commitment is to serve a percentage of locations within the specified geographic area, the relevant percentage),
- d. the amount of public funding to be used,

- e. the cost of service to the consumer, and
- f. the matching commitment, if any, provided by the subgrantee, its affiliates, or any eligible entity partner under the TBCP.

02.05.01 Non-Deployment Subgrantee Selection Process Integrity

Describe a fair, open, and competitive subgrantee selection process for eligible non-deployment activities. Responses must include the objective means, or process, by which objective means will be developed, for selecting subgrantees for eligible non-deployment activities. If the Eligible Entity does not intend to subgrant for non-deployment activities, indicate such.

The ABO estimates the cost of deployment to unserved, underserved, and community anchor institution locations will exceed available funds. In the unusual case that there are remaining funds, the ABO will add all remaining BEAD funds to Alaska's Digital Equity Capacity Grant allocation to expand the total funding available for the in-state Digital Equity Capacity Grant program.

02.05.02 Non-Deployment Initiative Preferences

Describe the Eligible Entity's plan for the following:

- a. How the Eligible Entity will employ preferences in selecting the type of non-deployment initiatives it intends to support using BEAD Program fund;
- b. How the non-deployment initiatives will address the needs of residents within the jurisdiction;
- c. The ways in which engagement with localities and stakeholders will inform the selection of eligible non-deployment activities;
- d. How the Eligible Entity will determine whether other uses of the funds might be more effective in achieving the BEAD Program's equity, access, and deployment goals.

a. – d. above will be managed through the outcome of the Digital Equity Capacity Grant NOFO. The ABO will provide more clarity once the NOFO is published.

02.05.03 Ensure Coverage Prior to Non-Deployment Projects

Describe the Eligible Entity's plan to ensure coverage to all unserved and underserved locations prior to allocating funding to non-deployment activities.

The focus of the State of Alaska's Grant Program is to deploy broadband service to unserved locations (those without any broadband service at all or with broadband service offering speeds below 25Mbps downstream/3Mbps upstream) and underserved locations (those without service or offering speeds below 100Mbps downstream/20Mbps upstream). The ABO will prioritize awards first for projects to unserved locations, followed second by projects to underserved locations. Funds remaining after the award of projects serving 100 percent of unserved and underserved locations will be available for projects providing symmetrical 1 Gigabit per second service to Community Anchor Institutions (CAIs). To the extent any remaining funds are available after funding 100% of all unserved, underserved, and CAI locations, the ABO will allocate funds to non-deployment activities.

02.05.04 Non-Deployment Subgrantee Qualifications

Describe how the Eligible Entity will ensure prospective subgrantees meet the general qualifications outlined on pages 71 – 72 of the BEAD NOFO.

In the unusual case that there are remaining funds, the ABO will add all remaining BEAD funds to Alaska's Digital Equity Capacity Grant allocation to expand the total funding available for the in-state Digital Equity Capacity Grant program. Should this scenario come to pass, the ABO will utilize the yet-to-be-determined criteria from its in-state Digital Equity Capacity Grant program that conform to the non-deployment general qualifications in the BEAD NOFO to ensure compliance.

02.06.01 Eligible Entity Implementation Activities

Describe any initiatives the Eligible Entity proposes to implement as the recipient without making a subgrant, and why it proposes that approach.

The Alaska Broadband Office will only be implementing initiatives through subgrants.

02.07.01 Labor Standards and Protection: Subgrantees Compliance with Federal Labor and Employment Laws

Describe the specific information that prospective subgrantees will be required to provide in their applications and how the Eligible Entity will weigh that information in its competitive subgrantee selection processes. Information from prospective subgrantees must demonstrate the following and must include information about contractors and subcontractors:

- a. Prospective subgrantees' record of past compliance with federal labor and employment laws, which:
 - i. Must address information on these entities' compliance with federal labor and employment laws on broadband deployment projects in the last three years;
 - ii. Should include a certification from an Officer/Director- level employee (or equivalent) of the prospective subgrantee evidencing consistent past compliance with federal labor and employment laws by the subgrantee, as well as all contractors and subcontractors; and
 - iii. Should include written confirmation that the prospective subgrantee discloses and instances in which it or its contractors or subcontractors have been found to have violated laws such as the Occupational Safety and Health Act, the Fair Labor Standards Act, or any other applicable labor and employment laws for the preceding three years.
- b. Prospective subgrantees' plans for ensuring compliance with federal labor and employment laws, which must address the following:
 - i. How the prospective subgrantee will ensure compliance in its own labor and employment practices, as well as that of its contractors and subcontractors, including:
 - 1. Information on applicable wage scales and wage and overtime payment practices for each class of employees expected to be involved directly in the physical construction of the broadband network; and

2. How the subgrantee will ensure the implementation of workplace safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment projects.

The Alaska Broadband Office is dedicating 20% of the primary scoring criteria to Fair Labor Practices.

Section II.14.C. of Alaska's Grant Program requires applicants to submit Demonstrated Record and Plans as follows:

Applicants must demonstrate three years of history for themselves and any other entity that will participate in the project, including contractors and subcontractors, of compliance with federal labor and employment laws on broadband deployment projects. New entrant applicants, without historical records, may submit historical data for the project team that has been assembled, including contractors and subcontractors, or provide specific, forward-looking commitments to strong labor and employment standards and protections with respect to BEAD-funded projects. All applicants shall show past compliance and disclose all violations and outcomes for that three-year period certified by an authorized official equivalent to an Officer or Director-level employee within the applicant's organization. Other considerations include the applicant and its contractors and sub-contractors' disclosed violation of laws such as the Occupational Safety and Health Act, the Fair Labor Standards Act, or other applicable labor and employment laws. Finally, this category will be scored on how the applicant will ensure compliance for itself, contractors, and subcontractors with labor and employment practices for the proposed deployment project including: 1) applicable wage scales and wage and overtime payment practices for each class of employee expected to be involved directly in the physical construction of the broadband network; and 2) how the applicant will ensure the implementation of workplace safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment projects.

02.07.02 Labor Standards and Protection: Additional Measures

Describe in detail whether the Eligible Entity will make mandatory for all subgrantees (including contractors and subcontractors) any of the following and, if required, how it will incorporate them into binding legal commitments in the subgrants it makes:

- a. Using a directly employed workforce, as opposed to a subcontracted workforce;
- b. Paying prevailing wages and benefits to workers, including compliance with Davis-Bacon and Service Contract Act requirements, where applicable, and collecting the required certified payrolls;
- c. Using project labor agreements (i.e., pre-hire collective bargaining agreements between unions and contractors that govern terms and conditions of employment for all workers on a construction project);
- d. Use of local hire provisions;
- e. Commitments to union neutrality;
- f. Use of labor peace agreements;

g. Use of an appropriately skilled workforce (e.g., through Registered Apprenticeships or other joint labor-management training programs that serve all workers, particularly those underrepresented or historically excluded);

h. Use of an appropriately credentialed workforce (i.e., satisfying requirements for appropriate and relevant pre-existing occupational training, certification, and licensure); and

i. Taking steps to prevent the misclassification of workers.

a. The Alaska Broadband Office will not require the use of a directly employed workforce.

b. The Alaska Broadband Office will not require the payment of prevailing wages by non-government entities. Political subdivisions of the State of Alaska are required by law to pay prevailing wages.

c. The Alaska Broadband Office will not require the use of project labor agreements.

d. The Alaska Broadband Office is constitutionally (State) prohibited from including or enforcing local hiring preferences. The determinations regarding this limitation come from 1) State of Alaska v. Enersch Construction, Inc., 787 P.2d 624 (Alaska 1989); and 2) Alaska Attorney General Opinion, October 3, 2019. Both documents can be found in the Supplemental Material submitted with Initial Proposal Volume 2.

e. The Alaska Broadband Office will not require commitments to union neutrality.

f. The Alaska Broadband Office will not require the use of labor peace agreements.

g. The Alaska Broadband Office is requiring the use of an appropriately skilled workforce and applicant are required to submit detailed information regarding this subject.

h. The Alaska Broadband Office is requiring the use of an appropriately credentialed workforce and applicant are required to submit detailed information regarding this subject.

i. Section III.A.6.F (Fair Labor Standards) of Alaska's Broadband Grant Program requires applicants to include a list of anticipated job titles and the classification of each position for both union and non-union workforces.

02.08.01 Prospective Subgrantees' Workforce Plan

Describe how the Eligible Entity and their subgrantees will advance equitable workforce development and job quality objectives to develop a skilled, diverse workforce. At a minimum, this response should clearly provide each of the following, as outlined on page 59 of the BEAD NOFO:

a. A description of how the Eligible Entity will ensure that subgrantees support the development and use of a highly skilled workforce capable of carrying out work in a manner that is safe and effective;

b. A description of how the Eligible Entity will develop and promote sector-based partnerships among employers, education and training providers, the public workforce system, unions and worker organizations, and community-based organizations that provide relevant training and wrap-around services to support workers to access and complete training (such as child care, transportation, mentorship, etc.), to attract, train, retain, or transition to meet local workforce needs and increase high-quality job opportunities;

c. A description of how the Eligible Entity will plan to create equitable on-ramps into broadband-related jobs, maintain job quality for new and incumbent workers engaged in the sector; and continually engage with labor organizations and community-based organizations to maintain worker voice throughout the planning and implementation process; and

d. A description of how the Eligible Entity will ensure that the job opportunities created by the BEAD Program and other broadband funding programs are available to a diverse pool of workers.

a. Sections II.14.C. and III.6.F. of Alaska's Grant Program require applicants to submit detailed plans for the use and development of a highly skilled and credentialed workforce capable of carrying out work in a manner that is safe and effective. Implementations of these plans will be monitored by the Alaska Broadband Office as part of the milestone monitoring embedded in the grant agreement for each sub-awardee.

b. The ABO convened an advisory partner group to provide guidance and feedback in the development of Alaska's Broadband Workforce Development Plan (ABWD Plan or "the Plan"). Partners represent a variety of constituencies including telecommunications and construction trade associations, public and private postsecondary education/training, Alaska Native entities, regional training centers, unions, apprenticeship training programs, non-profits, and state agencies.

The Plan was informed through regular contact with the advisory group via email, virtual and in-person meetings, and website surveys and forums. Additionally, over 75 entities, representing more than 13,000 Alaskans, have been contacted directly via email, virtual or in-person meetings, online surveys, and conference presentations. These entities include public and private secondary and postsecondary training providers, Alaska Native entities, Internet Service Providers (ISPs), construction contractors, unions, economic development groups, workforce intermediaries, industry associations and consortia, non-profits, state agencies, and broadband training vendors.

Strategy 1 of the ABWD Plan is to, "Implement the Broadband Workforce Development Plan, coordinate action steps, and build a sustainable industry-led program that continually focuses in on public and private partnerships that can meet industry labor supply challenges and produce a highly skilled and technically trained workforce."

Strategy 2 of the Plan is to, "Build on existing construction industry training workforce efforts." The objective here is that each region will implement a broadband construction and telecommunications workforce development network that involves industry employers, educators, trainers, and support service providers who work together to prepare students and potential job seekers for employment.

Strategy 3 of the Plan is to, "Increase career awareness and information about telecommunications occupations and employment" by creating a statewide marketing campaign that increases student and potential worker awareness about the broadband construction and telecommunications industry and broadband employment opportunities, and connect them to career education, training, and services that prepare them for industry jobs.

c. Strategy 4 of the Plan is to, "Increase education and training programs that prepare students and adults for apprenticeship and entry level employment in telecommunications occupations." The ABO or designated Broadband Workforce Intermediary, along with the Alaska Department of Education and Early Development and the telecommunication industry, will develop a new Career and Technical Education Program of Study (CTEPS) that every school can use. King Tech High School's Telecommunications CTE program offers a model. ABO or the Industry Workforce Intermediary will identify and raise new resources with industry, state agencies, regional partners, and grants to support strategic activities and action steps. Some support and activities will be based upon broadband project

timing and available regional labor supply and priority occupation demand gaps. The intent is there will be a method and process to provide an equitable distribution of new resources, based upon regional needs or opportunities, and that the regional and state trainee support service network is functioning and has support services resources available. This strategy offers state agencies receiving IJA funding to invest federal funds to develop the broadband and cross-industry workforce utilizing regionally located training facilities that meet DEED and the Alaska Commission on Post-Secondary Education standards for offering education and training. Training and support services would be aligned with the ADOLWD Eligible Training Provider List (ETPL) requirements that allow the Alaska Job Centers (AJCs) to issue Individual Training Account (ITA) vouchers and provide case-managed support services. AJCs have an existing and connected support service delivery system that coordinates with Alaska Native Corporation and Tribal Offices for the delivery of support services. Building upon the exiting CTE and construction industry workforce development framework and support service delivery network will expedite training and support, reduce duplication of effort, and offer a more cost-effective use of resources. The Plan report provides information about additional ways to implement this strategy.

The diverse Broadband Workforce Development Team established at the onset of planning will remain in place to help guide the workforce efforts outlined in the plan. Gatherings of the team will provide a forum for engagement with all stakeholders, including labor organizations and community-based organizations.

d. Alaska's Broadband Workforce Development Plan (ABWD) has three goals, the second of which is, "Develop a diverse and inclusive regional broadband industry workforce." Strategy 5 of the ABWD is, "Put in place recruitment, training, and employment efforts focused on targeted populations." There are five Action Steps associated with this strategy:

1. Work directly with agencies and organizations that already work with targeted populations to build avenues to the broadband industry talent pipeline and jobs.
2. Meet with industry employers to learn about their specific workforce needs and develop relationships that lead to employment opportunities for specific populations.
3. Use agency and partner communications processes to increase system-wide awareness about special population employment opportunities and ways to connect clients to talent pipelines.
4. Develop industry-focused outreach, training, and employment agency and partner action plans that connect clients to appropriate education, training, and support services.
5. Organize and support a coordinated effort with Alaska Job Centers, Alaska Native entities, and other agencies to provide support services for individuals.

Underrepresented and underserved populations can significantly help meet industry and Alaska's workforce supply needs. This strategy involves connecting Plan activities and resources with several state agencies: Alaska Division of Vocational Rehabilitation and Division of Employment and Training Services, Alaska Department of Corrections; Alaska Department of Health and Human Services, and Department of Education and Early Development. These agencies already work closely with Alaska RuralCAP; Regional Alaska Native entities and Community Based Organizations. Alaska's Workforce Innovation and Opportunity Act (WIOA) statewide coordinated services plan describes the roles, programs, collaboration, and resources of these agencies and partners to assist targeted populations. The action steps, for the most part, describe what these agencies and partners do, and provide them a framework for engaging with broadband employers and assisting clients in accessing training and support services that lead to employment. There are also auxiliary programs mentioned in the Broadband Workforce Development Plan report that work closely with the agencies to provide services for underserved populations including women, Veterans, and minority populations. Most of these agencies and partners are part of Alaska's WIOA coordinated services workforce plan and have state

and federal approved action plans and resources to assist their targeted populations. Additional support may be needed to provide accommodation, appropriate training, and special needs services.

The Interim Report on Alaska's Broadband Workforce Development Plan attached as supplemental information.

02.08.02 Prospective Subgrantees' Highly Skilled Workforce

Describe the specific information that will be required of prospective subgrantees to demonstrate a plan for ensuring that the project workforce (including contractors and subcontractors) will be an appropriately skilled and credentialed workforce. These plans should include the following:

- a. The ways in which the prospective subgrantee will ensure the use of an appropriately skilled workforce, e.g., through Registered Apprenticeships or other joint labor-management training programs that serve all workers;
- b. The steps that will be taken to ensure that all members of the project workforce will have appropriate credentials, e.g., appropriate and pre-existing occupational training, certification, and licensure;
- c. Whether the workforce is unionized;
- d. Whether the workforce will be directly employed or whether work will be performed by a subcontracted workforce; and
- e. The entities that the proposed subcontractor plans to contract and subcontract with in carrying out the proposed work.

If the project workforce or any subgrantee's, contractor's, or subcontractor's workforce is not unionized, the subgrantee must also provide with respect to the non-union workforce:

- a. The job titles and size of the workforce (FTE positions, including for contractors and subcontractors) required to carry out the proposed work over the course of the project and the entity that will employ each portion of the workforce;
- b. For each job title required to carry out the proposed work (including contractors and subcontractors), a description of:
 - i. Safety training, certification, and/or licensure requirements (e.g., OSHA 10, OSHA 30, confined space, traffic control, or other training as relevant depending on title and work), including whether there is a robust in-house training program with established requirements tied to certifications, titles; and
 - ii. Information on the professional certifications and/or in-house training in place to ensure that deployment is done at a high standard.

Section II.14.C. of Alaska's Grant Program requires the submittal (for scoring) of a Highly Skilled Workforce Plan as follows:

Highly Skilled Workforce Plan. Applications will be scored based on their plan for ensuring the project

workforce will be appropriately skilled and credentialed (including contractors and subcontractors). Factors that will be considered include: 1) the ways in which the applicant will ensure the use of an appropriately skilled workforce (e.g., registered apprenticeships); 2) the steps the applicant will take to ensure an appropriately credentialed workforce (e.g., licensure, occupational training); 3) identify whether the workforce is unionized; 4) identify status of workforce (e.g., directly employed or contracted); and 5) identification of proposed contractors and subcontractors.

Section III.6.F. of Alaska's Grant Program requires the following narrative description of the workforce plan:

Applicants should include a description of any existing or planned workforce development programs within the region(s) of a project.

Applicants must have a plan for ensuring the project workforce will be appropriately skilled and credentialed (including contractors and subcontractors). Factors that will be considered include: 1) the ways in which the applicant will ensure the use of an appropriately skilled workforce (e.g., registered apprenticeships); 2) the steps the applicant will take to ensure an appropriately credentialed workforce (e.g., licensure, occupational training); 3) identify whether the workforce is unionized; 4) identify status of workforce (e.g., directly employed or contracted); and 5) identification of proposed contractors and subcontractors.

Non-Union Workforce Requirements. If the project workforce, or any applicant's, contractor's, or subcontractor's workforce is not unionized the applicant must provide the following with respect to the non-union workforce:

1. The jobs titles and size of the workforce (in terms of Full-Time-Equivalent positions, including those of contractors and subcontractors) required to carry out the proposed work over the course of the project and the entity that will employ each portion of the workforce; and
2. For each job title required to carry out the proposed work (including contractors and subcontractors) a description of: safety training, certification, and/or licensure requirements (e.g., OSHA 10, OSHA 30, confined space, traffic control, etc.) including whether there is a robust in-house training program with established requirements tied to certifications, titles, and information on the professional certifications and/or in-house training in place to ensure that deployment is done at a high standard.

Applicants must demonstrate three years of history for themselves and any other entity that will participate in the project, including contractors and subcontractors, of compliance with federal labor and employment laws on broadband deployment projects. New entrant applicants, without historical records, may submit historical data for the project team that has been assembled, including contractors and subcontractors. All applicants shall show past compliance and disclose all violations and outcomes for that three-year period certified by an authorized official within the applicant's organization. Other considerations include the applicant and its contractors and sub-contractors disclosed violation of laws such as the Occupational Safety and Health Act, the Fair Labor Standards Act, or other applicable labor and employment laws. Finally, this category will be scored on how the applicant will ensure compliance for itself, contractors and subcontractors with labor and employment practices for the proposed deployment project including: 1) applicable wage scales and wage and overtime payment practices for each class of employee expected to be involved directly in the physical construction of the broadband network; and 2) how the applicant will ensure the implementation of workplace safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment projects.

02.09.01 Minority Business Enterprises (MBEs), Women's Business Enterprises (WBEs), and Labor Surplus Firms Inclusion Strategy

Describe the process, strategy, and the data tracking method(s) the Eligible Entity will implement to ensure that minority businesses, women-owned business enterprises, and labor surplus area firms are recruited, used, and retained when possible.

The ABO may pursue strategies that promote the six steps towards recruitment of MBEs, WBEs, and LSAs detailed in the BEAD NOFO. These steps and their associated strategies are detailed below:

1. Place qualified small and minority businesses and women's business enterprises on solicitation lists.
 - Encourage eligible businesses to register as Small Disadvantaged Businesses (SDB), WBEs, and MBEs.
2. Assure that small and minority businesses and women's business enterprises are solicited whenever they are potential sources.
 - Make advertisements to potential MBEs, WBEs, and LSAs about opportunities.
 - Publish and promote BEAD funding opportunities broadly to encourage a wide range of prospective subgrantees.
3. Divide the total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses and women's business enterprises.
 - Break down projects into smaller phases throughout buildout, when appropriate.
4. Establish delivery schedules, where the requirements permit, which encourage participation by small and minority businesses and women's business enterprises.
 - Support MBEs, WBEs, and LSAs in adhering to delivery schedules.
5. Use the services and assistance, as appropriate, of such organizations as the Small Business Administration (SBA) and the U.S. Department of Commerce, Minority Business Development Agency (MBDA).
 - Encourage subgrantees to consult with SBA's Small Business Development Centers and MBDA's State-Based Business Centers.
6. Require subgrantees to take the affirmative steps as it relates to its subcontractors.
 - Accept an MBE, WBE, and LSA recruitment plan and additional relevant documentation stating a commitment to adhering to MBE, WBE, and LSA utilization.

The proposed strategies are not representative of a conclusive list, and the Office will continue to iterate through the process and with selected subgrantees. In addition, the Office will track the number of contracts that are awarded to MBEs, WBEs, and LSAs. Selected subgrantees, contractors, and subcontractors will be required to submit periodic reports to the Office demonstrating their efforts to engage a broad range of businesses to expand broadband deployment in Alaska.

02.09.02 MBEs, WBEs, and Labor Suplus Firms Inclusion Affirmative Steps

Certify that the Eligible Entity will take all necessary affirmative steps to ensure minority businesses, women's business enterprises, and labor surplus area firms are used when possible, including the following outlined on pages 88 – 89 of the BEAD NOFO:

- a. Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
- b. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;

- c. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
- d. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
- e. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
- f. Requiring subgrantees to take the affirmative steps listed above as it relates to subcontractors.

Yes

02.10.01 Cost and Barrier Reduction Steps

Identify steps that the Eligible Entity has taken or will take to reduce costs and barriers to deployment. Responses may include but not be limited to the following:

- a. Promoting the use of existing infrastructure;
 - b. Promoting and adopting dig-once policies;
 - c. Streamlining permitting processes;
 - d. Streamlining cost-effective access to poles, conduits, easements; and
 - e. Streamlining rights of way, including the imposition of reasonable access requirements.
- a. The State has already enacted plans to reduce costs and barriers through involving existing providers and interconnecting to existing infrastructure through mapping and permitting tools utilized by the ABO and made available to providers. Applicants will need to show that they are interconnecting rather than overbuilding existing infrastructure. This will reduce costs, optimize the BEAD funds, and add resilience and redundancy to the existing infrastructure in Alaska.
- b. Additionally, the ABO is working with the Department of Transportation and Public Facilities (DOT&PF) of the State of Alaska to coordinate projects that the DOT&PF has, as well as projects that the ABO is contemplating, to ensure, wherever possible, the projects can be aligned for a dig-once policy.
- c., d. & e. Most importantly, the ABO and the OPMP have worked together to get all state and federal permitting parties together in an effort to optimize and streamline the permitting processes. To accomplish this the ABO is using a Bureau of Land Management (BLM) GIS map that shows all land ownership within the state of Alaska. The ABO will use this map in conjunction with the subgrantees to have them identify the fiber paths for all proposed infrastructure builds so that as soon as the applications are submitted to the ABO, all the permitting parties will know the paths and what lands will

be crossed. The OPMP has developed a survey of all permitting parties and all permitting types that the sub-grantee can then use to check off which parties will be issuing permits and what those permits will be. The OPMP will then facilitate and manage their permitting process of the various parties and sub-grantees.

02.11.01 Climate Risks Assessment

Describe the Eligible Entity's assessment of climate threats and proposed mitigation methods. If an Eligible Entity chooses to reference reports conducted within the past five years to meet this requirement, it may attach this report and must provide a crosswalk narrative, with reference to page numbers, to demonstrate that the report meets the five requirements below. If the report does not specifically address broadband infrastructure, provide additional narrative to address how the report relates to broadband infrastructure.

At a minimum, this response should clearly do each of the following, as outlined on pages 62 – 63 of the BEAD NOFO:

- a. Identify the geographic areas that should be subject to an initial hazard screening for current and projected future weather and climate-related risks and the time scales for performing such screenings;
- b. Characterize which projected weather and climate hazards may be most important to account for and respond to in these areas and over the relevant time horizons;
- c. Characterize any weather and climate risks to new infrastructure deployed using BEAD Program funds for the 20 years following deployment;
- d. Identify how the proposed plan will avoid and/or mitigate weather and climate risks identified; and
- e. Describe plans for periodically repeating this process over the life of the Program to ensure that evolving risks are understood, characterized, and addressed, and that the most up-to-date tools and information resources are utilized.

a. Geographic/Jurisdictional Locations of Threats

The State of Alaska evaluates, on a five-year cadence, the following geographical areas along with the identification of the potential hazards:

Aleutians East Borough (Akutan, Cold Bay, False Pass, King Cove, Nelson Lagoon, Sand Point): Earthquake, Erosion, Flood, Permafrost, Tsunami, Severe Weather, Volcano

Aleutians West Census Area (Adak, Atka, Nikolski, Saint George, Saint Paul, Unalaska): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Tsunami, Severe Weather, Volcano, Wildfire

Anchorage Municipality (Chugiak, Eagle River, Girdwood): Earthquake, Flood, Glacier, Ground Failure/Landslide/Avalanche, Severe Weather, Volcano, Wildfire

Bethel Census Area (Akiachak, Akiak, Aniak, Atmautluak, Bethel, Chefnak, Chuathbaluk, Crooked Creek, Eek, Goodnews Bay, Kasigluk, Kipnuk, Kongiganak, Kwethluk, Kwigillingok, Lime Village, Lower Kalskag, Mekoryuk, Mertarvik, Napakiak, Napaskiak, Newtok, Nightmute, Nunapitchuk,

Oscarville, Platinum, Quinhagak, Red Devil, Sleetmute, Stoney River, Tooksook Bay, Tuluksak, Tuntutuliak-, Tununak, Upper Kalskag): Earthquake, Erosion, Flood, Ground Failure, Permafrost, Severe Weather, Wildfire

Bristol Bay Borough (Naknek, King Salmon, South Naknek): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Tsunami, Volcano, Severe Weather, Wildfire

Chugach Census Area (Chenega, Cordova, Tatitlek, Valdez, Whittier): Earthquake, Erosion, Flood, Glacier, Ground Failure/Landslide/Avalanche, Tsunami, Volcano, Severe Weather, Wildfire

Copper River Census Area (Chisana, Chistochina, Chitina, Copper Center, Gakona, Glennallen, Gulkana): Earthquake, Erosion, Flood, Glacier, Ground Failure/Landslide/Avalanche, Severe Weather, Volcano, Wildfire

Denali Borough (Anderson, Healy, McKinley Village, Cantwell): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Permafrost, Volcano, Severe Weather, Wildfire

Dillingham Census Area (Aleknagik, Clark's Point, Dillingham, Koliganek, Ekwok, New Stuyahok, Manokotak, Twin Hills, Portage Creek, Togiak): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Permafrost, Tsunami, Volcano, Severe Weather, Wildfire

Fairbanks North Star Borough (Fairbanks, North Pole, Badger, Chena Hot Springs, Chena Ridge, College, Eileson AFB, Ester, Farmers Loop, Fort Wainwright, Fox, Goldstream, Harding-Birch Lakes, Moose Creek, Pleasant Valley, Salcha, South Van Horn, Steele Creek, Two Rivers): Earthquake, Erosion, Flood, Permafrost, Volcano, Severe Weather, Wildfire

Haines Borough (Covenant, Excursion Inlet, Haines, Lutak, Mosquito Lake, Mud Bay): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Tsunami, Severe Weather, Wildfire

Hoonah-Angoon Census Area (Angoon, Cube Cove, Elfin Cove, Gustavus, Hobart Bay, Hoonah, Klukwan, Game Creek, Pelican, Tenakee Springs): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Tsunami, Severe Weather, Wildfire

Juneau City & Borough (Juneau, Douglas): Earthquake, Erosion, Flood, Glacier, Ground Failure/Landslide/Avalanche, Tsunami, Volcano, Severe Weather, Wildfire

Kenai Peninsula Borough (Kenai, Soldotna, Homer, Seldovia, Seward, Kachemak City, Tyonek, Port Graham, Nanwalek, Nikiski, Anchor Point, Cooper Landing, Halibut Cove, Hope, Kasilof, Moose Pass, Bear Creek, Beluga, Clam Gulch, Cohoe, Crown Point, Diamond Ridge, Fox River, Fritz Creek, Funny River, Happy Valley, Kachemak Selo, Kalifornsky, Lowell Point/Miller's Landing, Nikolaevsk, North Kenai, Primrose, Ridgeway, Salmatof, Sterling, Sunrise, Vosnesenka): Earthquake, Erosion, Flood, Glacier, Ground Failure/Landslide/Avalanche, Tsunami, Severe Weather, Volcano, Wildfire

Ketchikan Gateway Borough (Ketchikan, Saxman, Loring, Ward Cove): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Tsunami, Severe Weather, Wildfire

Kodiak Island Borough (Akhiok, Aleneva, Chiniak, Karluk, Kodiak, Kodiak Station, Larsen Bay, Mill Bay, Old Harbor, Ouzinkie, Port Lions, Womens Bay): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Tsunami, Volcano, Severe Weather, Wildfire

Kusilvak Census Area (Alakanuk, Chevak, Emmonak, Hooper Bay, Kotlik, Marshall, Pitkas Point): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Permafrost, Severe Weather, Wildfire

Lake & Peninsula Borough (Chignik Lake, Chignik Lagoon, Chignik Bay, Egegik, Ivanoff Bay, Iliamna, Igiugig, Levelock, Nondalton, Newhalen, Port Heiden, Port Alsworth, Pilot Point, Pedro Bay, Perryville): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Tsunami, Severe Weather, Volcano, Wildfire

Matanuska-Susitna Borough (Big Lake, Buffalo Soapstone, Butte, Chase, Chickaloon, Eureka, Farm Loop, Fishhook, Gateway, Glacier View, Houston, Knik River Knik-Fairview, Lake Louise, Lazy Mountain, Meadow Lakes, North Lakes, Palmer, Petersville, Point MacKenzie, Skwentla, SouthLakes, Susitna, Susitna North, Sutton-Alpine, Talkeetna, Tanaina, Trapper Creek, Wasilla, Willow): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Volcano, Severe Weather, Wildfire

Nome Census Area (Brevig Mission, Diomedes, Elim, Gambell, Golovin, Haycock, Koyuk, Nome, Port Clarence, Savoonga, Shaktoolik, Shishmaref, Solomon, St. Michael, Stebbins, Teller, Unalakleet, Wales, White Mountain): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Permafrost, Volcano, Sea Ice, Severe Weather, Wildfire

Northwest Arctic Borough (Abler, Buckland, Deering, Kiana, Kivalina, Kobuk, Kotzebue, Noatak, Noorvik, Selawik, Shungnak): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Permafrost, Sea Ice, Severe Weather, Wildfire

North Slope Borough (Anaktuvuk Pass, Atkasuk, Kaktovik, Nuiqsit, Point Hope, Point Lay, Prudhoe Bay, Utqiagvik, Wainwright): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Permafrost, Sea Ice, Severe Weather, Wildfire

Petersburg Borough (Petersburg, Kupreanof): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Tsunami, Severe Weather, Wildfire

Prince of Wales/Hyder Census Area (Coffman Cove, Craig, Edna Bay, Hollis, Hyder, Hydaburg, Kake, Kasaan, Klawock, Metlakatla, Naukatli Bay, Point Baker, Port Alexander, Port Protection, Thorne Bay, Waterfall, Whale Pass): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Tsunami, Volcano, Severe Weather, Wildfire

Sitka City & Borough (Sitka): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Tsunami, Severe Weather, Wildfire

Skagway Municipality (Skagway, Dyea): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Tsunami, Severe Weather, Wildfire

Southeast Fairbanks Census Area (Alcan Border, Big Delta, Chicken, Delta Junction, Deltana, Dot Lake, Dot Lake Village, Dry Creek, Eagle, Eagle Village, Fort Greely, Healy Lake, Northway, Tanacross, Tetlin, Tok, Whitestone): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Permafrost, Severe Weather, Wildfire

Wrangell City & Borough (Wrangell, Meyers Chuck): Earthquake, Erosion, Flood, Ground

Failure/Landslide/Avalanche, Tsunami, Severe Weather, Wildfire

Yakutat City & Borough (Yakutat): Earthquake, Erosion, Flood, Glacier, Ground Failure/Landslide/Avalanche, Tsunami, Severe Weather, Wildfire

Yukon/Koyukuk Census Area (Alatna, Allakaket, Anvik, Arctic Village, Beaver, Bettles, Birch Creek, Central, Chalkyitsik, Circle, Coldfoot, Evansville, Flat, Fort Yukon, Four Mile Road, Galena, Grayling, Holy Cross, Hughes, Huslia, Kaltag, Koyukuk, Lake Minchumina, Livengood, Manley Hot Springs, McGrath, Minto, Nenana, New Allakaket, Nikoli, Nulato, Rampart, Ruby, Shageluk, Stevens Village, Tanana, Takotna, Venetie, Wiseman): Earthquake, Erosion, Flood, Ground Failure/Landslide/Avalanche, Permafrost, Severe Weather, Wildfire

b. Projected Weather and Climate

The State of Alaska completed its latest update to the State Hazard Mitigation Plan in 2023. Section 4 of the State Hazard Mitigation Plan, titled Hazard Identification & Risk Assessment, identifies nine natural hazards including: cryosphere and permafrost degradation, earthquake, erosion, flood, ground failure/landslide/avalanche, tsunami, volcano, severe weather, and wildfire. Of the nine, six can be potentially associated with climate threats. Those six are cryosphere and permafrost degradation, erosion, flood, ground failure/landslide/avalanche, severe weather, and wildfire. All six climate-associated hazards include sub-categories, or groups, of hazards.

Cryosphere contains four groups including: glaciers, permafrost and periglacial, sea ice and, snow avalanche. Those four groups can be further broken down into subcategories. Glaciers can facilitate six events, including calving, ice falls, ice avalanches, glacier detachment, glacier lake outburst flood, and glacial surge. Permafrost contains six events including augeis or icing, frost cracking, frost heaving, frost jacking, thermokarst, and usteq.

Sea ice hazards include drifting ice (iceberg), grounded floeberg, an ice push, a landfast ice breakout, and slush ice.

Snow avalanche hazards include a cornice collapse, a loose snow avalanche, a slab avalanche, a slush avalanche, and a glide avalanche.

There are three main types of erosion in Alaska: coastal, riverine, and wind.

Flooding can take many forms in Alaska, and include the following major categories: riverine, coastal flood, fluctuating lake levels, glacial lake outburst, groundwater, and ice overflow (augeis). Riverine flooding includes subcategories of overbank (rainfall-runoff, snowmelt), alluvial fan, flash, and ice jam. Coastal flood includes the subcategories storm surge and sea level rise.

Ground failure, or the more commonly used term landslide includes several different types of events including rotational landslide, translational landslide, block slide, rockfall, topple, debris flow, debris avalanche, earthflow, soil creep, lateral spread, and slump. Other types of ground failures include subsidence, thermokarst, and frozen debris lobes.

Severe weather takes many forms in Alaska. Those include extreme cold, winter storms, heavy or excessive snow, high winds, ice storms, thunderstorms, tornadoes, heavy rains, and storm surge.

Figure 4.1.1-15 on page 4-21 of the State Hazard Mitigation Plan shows the combined threat risk and

ranking of Alaska communities for erosion, flooding, and thawing permafrost leading to a catastrophic form of permafrost thaw collapse that occurs when frozen ground disintegrates under the compounding influences of thawing permafrost, flooding, and erosion.

Table 4.3-1 on page 4-257 of the State Hazard Mitigation Plan provides probability and magnitude of all other identified hazards for each community in the state.

c. Weather and climate risks to new infrastructure

Identification of weather and climate risk to new infrastructure are integral to Minimum Qualification (MQ) #7 of Alaska's Broadband Grant Program. This MQ requires applicants to submit a Weather/Climate Threat Assessment and Mitigation strategy using the 2023 State Hazard Mitigation Plan as a baseline for both design and construction. Subgrantees will be required to complete assessments for each climate threat identified in the State Hazard Mitigation Plan for each community or region where infrastructure is being deployed. Mitigation strategies will be required to accompany each identified threat to infrastructure.

d. Avoiding and/or mitigating weather and climate risks

As stated in subsection "c." the design and construction efforts by the subgrantees will include mitigation strategies tied to the 2023 State Hazard Mitigation Plan. This will ensure avoidance and/or mitigation of weather and climate risks.

e. Periodically repeating of the process over the life of the Program

As a federal requirement under the Federal Emergency Management Agency (FEMA) states are required to update Hazard Mitigation Plans every five years. Within the State of Alaska that responsibility lies with the Division of Homeland Security and Emergency Management (DHS&EM). The State Hazard Mitigation Plan can be found on the DHS&EM website. Subgrantees will be required to update their Weather/Climate Threat Assessment and Mitigation strategies within 6 months of the release of the updated DHS&EM State Hazard Mitigation Plan over the programmatic life of the asset.

02.11.01.01 Climate Reports

As an optional attachment, submit any relevant reports conducted within the past five years that may be relevant for this requirement and will be referenced in the text narrative above.

02.12.01 Low-Cost Broadband Service Option

Describe the low-cost broadband service option(s) that must be offered by subgrantees as selected by the Eligible Entity, including why the outlined option(s) best services the needs of residents within the Eligible Entity's jurisdiction. At a minimum, this response must include a definition of low-cost broadband service option that clearly addresses the following, as outlined on page 67 of the BEAD NOFO:

a. All recurring charges to the subscriber, as well as any non-recurring costs or fees to the subscriber (e.g., service initiation costs);

b. The plan's basic service characteristics (download and upload speeds, latency, any limits on usage or availability, and any material network management practices);

- c. Whether a subscriber may use any Affordable Connectivity Benefit subsidy toward the plan's rate; and
- d. Any provisions regarding the subscriber's ability to upgrade to any new low-cost service plans offering more advantageous technical specifications.

Each subgrantee will be required to present a proposed low-cost broadband service option plan as a part of their application process. Subgrantees will also be required to present their process for marketing this option to potential subscribers. Furthermore, subgrantees will be required to provide metrics related to the uptake of this plan, including, but not limited to, the number of individuals that have subscribed to the plan and the locations of these individuals at a county level. See 02.12.02 certification.

These plans must meet the minimum requirements outlined by the ABO below, but applicants are welcome to generate plans that suit their business models. These plans must remain in place for the useful life of the network assets. Applicants should only provide a single low-cost and single middle-class offering that applies to all its awarded programs under BEAD as opposed to different plans depending on the location of service provided in Alaska. Applicants are encouraged, but not required, to provide these same low-cost plans to their existing broadband deployments not associated with the BEAD program.

ABO selected the following requirements for low-cost broadband plans because they meet the spirit of the BEAD program while giving providers flexibility to customize them to meet their business needs and potentially use the differences as selling points between providers. Moreover, an equitable and robust low-cost service option promotes the uptake of BEAD funded broadband networks among residents of varying socioeconomic and geographic backgrounds. It also encourages subscribers to make use of the FCC's Affordable Connectivity Program (ACP).

The service characteristics outlined in the proposed plan include speeds and latency requirements that must be met in accordance with the FCC's 80/80 metric. That is, if the ABO or any other entity assigned by the ABO tests the end user speeds of these plans, the requirements will only be met if 80% of tests meet or exceed 80% of the required speeds and 95% of latency measurements must be at or below 100 milliseconds round trip. For instance, if the ABO runs 100 speed tests at a selection of locations that subscribe to low-cost broadband service plans, then at least 80 of those speed tests must meet 80% of the speed requirements and 95 latency measurements must meet requirements. For the purposes of these specifications, "typical" download or upload speeds mean that 80% of speed tests must demonstrate at or above 80% of such speeds. Furthermore, 95% of latency tests must demonstrate no more than 100 milliseconds of latency.

Subgrantees must include in their offerings a plan that meets the following specifications:

1. Total cost: for terrestrial Low-Cost Service, plans must not exceed a cost of \$110.00 per month, including of all taxes, fees, and charges; For satellite Low-Cost Service, plans must not exceed a cost of \$90.00 per month, including of all taxes, fees, and charges.
2. ACP participation. The plan must be made available to users eligible for and/or enrolled in ACP.
3. Offering period. The plan must be offered for at least ten years from service turn-up.
4. Price increases. Applicants are only permitted to increase prices of this plan: a) commensurate to year-over-year changes in the Consumer Price Index for All Urban Consumers: All Items Less Food & Energy (also known as Core CPI) as defined by the U.S. Bureau of Labor Statistics; or b) due to new or increased government mandated taxes and fees imposed on the consumer, not providers.
5. Service characteristics. The plan must provide the greater of (a) typical download speeds of at least

100 Mbps and typical upload speeds of at least 20 Mbps, or the fastest speeds the infrastructure is capable of if less than 100 Mbps/20 Mbps or (b) the performance benchmark for fixed terrestrial broadband service established by the Federal Communications Commission pursuant to Section 706(b) of the Communications Act of 1934, as amended.

6. Upgrades permitted. In the event the provider later offers a low-cost plan with higher speeds downstream and/or upstream, permits Eligible Subscribers that are subscribed to a low-cost broadband service option to upgrade to the new low-cost offering at no cost. By way of example, if a customer is subscribed to a low-cost broadband service option that provides service at 100/20 Mbps and the customer's service provider offers a new low-cost broadband service option at 200/20 Mbps after the FCC issues a new report pursuant to section 706(a) of the Communications Act of 1934, as amended, the customer would be allowed to upgrade to the 200/20 Mbps offering at no charge.

The ABO found the \$110.00 terrestrial and \$90.00 satellite strikes the best balance between affordability (especially for ACP eligible residents) and sustainability (see the explanation in the scoring section). In 2016, the Federal Communications Commission (FCC) began utilizing a benchmark of 2% of disposable monthly household income for broadband affordability while acknowledging the benchmark serves "as a clear yardstick for charting changes, not as an inherently meaningful level." Though best used for measuring changes, it still provides a starting point for assessing affordability. Given the unique cost challenges in Alaska, the ABO has determined that 4% is closer to reality. The ABO used a weighted average analysis of the 2023 income guideline based on the % of the population in each housing size category. This yielded a weighted average income of \$33,256.20. $\$33,256.20 \times 4\% \div 12 = \110.85 . The ABO rounded down to \$110.00.

Unfortunately, the ABO does not have control over whether ACP will expire and whether a successor program will be established. This low-cost plan will help ensure some level of end-user price stability in the event either of the preceding take place because these plans would be recommended to be capped at \$110 per month for terrestrial service and \$90.00 for satellite-based service, which, as noted above, strikes the necessary balance between affordability and sustainability. However, to provide greater end-user price stability would require a program of equal or greater size and scope—which is outside of the remit of the ABO and not financially feasible for it.

The ABO will consider updating minimum pricing requirements and other conditions of the low-cost service option at least twice within the next ten years after service turn-up based on changes in economic and market conditions per updated NTIA guidance on 2 CFR 200. Public comments will be solicited at those times. In the event the ABO seeks to update the minimum pricing requirements and other considerations of the low-cost service option, the ABO will obtain NTIA approval and execute a public notification and participation process. The ABO will execute this public notification and participation process consistent with the outreach and engagement strategies used throughout the BEAD program. The ABO uses its website, a list-serve of over 400 individuals, non-profit community organization and private companies as well as the over 400 Native entities (regional corporations, village corporations, Tribal governments, and non-profit organizations). Additionally, the ABO posts newsletters of upcoming events and holds three listening sessions per week for public input. To the degree practical, the ABO will socialize and solicit feedback at scheduled conferences, meetings, and Tribal consultations. This will ensure transparency of the process for updating minimum pricing requirements and other conditions of the low-cost service option.

02.12.02 Affordable Connectivity Program Participation

Certify that all subgrantees will be required to participate in the Affordable Connectivity Program or any successor program.

Yes

02.13.01 Middle-Class Affordability Plan Description

Describe a middle-class affordability plan that details how high-quality broadband services will be made available to all middle-class families in the BEAD-funded network's service area at reasonable prices. This response must clearly provide a reasonable explanation of how high-quality broadband services will be made available to all middle-class families in the BEAD-funded network's service area at reasonable prices.

Applicants must describe a middle-class affordability plan that details how high-quality broadband services will be made available to all middle-class families in the BEAD-funded network's service area at reasonable prices. This response must clearly provide a reasonable explanation of how high-quality broadband services will be made available to all middle-class families in the BEAD-funded network's service area at reasonable prices.

ABO is required by the BEAD program to propose a definition for a low-income plan and to propose a plan to address middle-class affordability. While the BEAD NOFO requires ABO to define specific characteristics of the low-cost plan, such as recurring and non-recurring charges, the plan's basic service characteristics like speeds, and latency, ACP eligibility, and ability to upgrade, the NOFO does not require ABO to define a "middle class affordability service plan offering" or prescribe a specific cost to such a plan, and ABO has not chosen to do so. Instead, the Middle-Class Affordability Plan could be termed as a strategy to meet the IIJA's affordability objective. ABO understands clearly it does not have the authority to regulate broadband rates. To that end, ABO commits to working closely with awarded subgrantees to drive adoption and uptake rates with non-deployment wrap around services, including, but not limited to, ACP enrollment assistance, digital navigator support, device access support, and digital literacy and skills training.

02.14.01 20 Percent of Funds Usage

Describe the Eligible Entity's planned use of any funds being requested, which must address the following:

- a. If the Eligible Entity does not wish to request for Initial Proposal funds, it must indicate no funding requested and provide the rationale for not requesting funds.
 - b. If the Eligible Entity is requesting less than or equal to 20 percent of funding allocation during the Initial Proposal round, it must detail the amount of funding requested for use upon approval of the Initial Proposal, the intended use of funds, and how the proposed use of funds achieves the statutory objective of serving all unserved / underserved locations.
 - c. If the Eligible Entity is requesting more than 20 percent (up to 100 percent) of funding allocation during the Initial Proposal round, it must detail the amount of funding requested for use upon approval of the Initial Proposal, the intended use of funds, how the proposed use of funds achieves the statutory objective of serving all unserved / underserved locations, and provide rationale for requesting funds greater than 20 percent of the funding allocation.
- a. The Alaska Broadband Office is requesting 100% of the BEAD allocation totaling \$1,012,139,672.42 instead of the 20%.

b. Not applicable. The Alaska Broadband Office is requesting 100% of the remaining BEAD allocation totaling \$1,012,139,672.42.

c. The Alaska Broadband Office is seeking the full award of \$1,012,139,672.42 in BEAD funding to promote a robust, fair, and competitive Subgrantee Selection Process. This gives applicants confidence in the full allocation and availability of funds. The ABO will use the funds to achieve “Internet for All” Alaskans by deploying funds through a grant program for infrastructure to serve unserved and underserved locations. The ABO will use the funds for:

1. Administrative costs (whether subject to the cap or not) not to exceed 2% of the full allocation totaling \$20,342,793.51.

2. Deployment activities through a fair and competitive grant program using the remaining portion of the allocation totaling \$991,796,881.91.

02.14.02 Initial Proposal Funding Request Amount

Enter the amount of the Initial Proposal Funding Request. If not requesting Initial Proposal funds, enter '\$0.00.'

\$1,012,139,672,.42

02.14.03 20 Percent of Funds Requirements

Certify that the Eligible Entity will adhere to BEAD Program requirements regarding Initial Proposal funds usage. If the Eligible Entity is not requesting funds in the Initial Proposal round and will not submit the Initial Proposal Funding Request, note “Not applicable.”

Yes

02.15.01 Laws Related to Subgrant Competition

a. Disclose whether the Eligible Entity will waive all laws of the Eligible Entity concerning broadband, utility services, or similar subjects, whether they predate or postdate enactment of the Infrastructure Act that either (a) preclude certain public sector providers from participation in the subgrant competition or (b) impose specific requirements on public sector entities, such as limitations on the sources of financing, the required imputation of costs not actually incurred by the public sector entity, or restrictions on the service a public sector entity can offer.

b. If the Eligible Entity will not waive all such laws for BEAD Program project selection purposes, identify those that it will not waive (using the Excel attachment) and their date of enactment and describe how they will be applied in connection with the competition for subgrants. If there are no applicable laws, note such.

The State of Alaska does not have laws, either predate or postdate, that preclude certain public sector providers from participation in the subgrant competition, or impose specific requirements on public sector entities, such as limitations on the sources of financing, the required imputation of costs not actually incurred by the public sector entity, or restrictions on the service a public sector entity can offer.

02.15.01.01 Laws Related to Subgrant Competition List

As a required attachment only if the Eligible Entity will not waive laws for BEAD Program project selection purposes, provide a list of the laws that the Eligible Entity will not waive for BEAD Program project selection purposes, using the Eligible Entity Regulatory Approach template provided.

02.16.01 Requirements Compliance Certification

Certify the Eligible Entity's intent to comply with all applicable requirements of the BEAD Program, including the reporting requirements.

Yes

02.16.02 Subgrantee Accountability

Describe subgrantee accountability procedures, including how the Eligible Entity will, at a minimum, employ the following practices outlined on page 51 of the BEAD NOFO:

- a. Distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize);
- b. The inclusion of clawback provisions (i.e., provisions allowing recoupment of funds previously disbursed) in agreements between the Eligible Entity and any subgrantee;
- c. Timely subgrantee reporting mandates; and
- d. Robust subgrantee monitoring practices.

a. The Alaska Broadband Office anticipates all projects to be deployment projects. Section IV. A of the Alaska Broadband Grant Program clearly outlines the program will be administered on a cost reimbursable basis only.

b. One of the standard provisions of all State of Alaska grant agreements, is a clawback provision. This section will match the clawback provision outlined in the BEAD NOFO.

c./d. The Alaska Broadband Office has developed the following subgrantee reporting and monitoring program:

- a. Financial/Progress Report – Submitted monthly, at minimum
The Grantee must submit a Financial/Progress Report through the Department's grant management portal each month during the life of the grant agreement. Each financial reporting period is from the first of the month through the last day of the month. Financial/Progress Reports may be submitted more frequently than once per month but must be submitted at minimum once per month, due on the thirtieth (30th) calendar day of each month. Financial/Progress Reports should reflect activities completed through a brief narrative and costs paid out during the reporting period.

The final Financial Report must be submitted within thirty (30) days following completion of the project. All project activities shall be completed with all costs paid and deliverables received prior to the end date referenced in Section III. Under no circumstances will the Department release funds to the

Grantee unless all required reporting is current.

It is incumbent on the grantee to communicate with the Department regarding all reporting matters. In the unforeseen event that the Department's grant management portal is not operational, grantees must submit reports via email directly to the Department at caa@alaska.gov.

b. Performance Report – Submitted semi-annually and annually

Grantees must submit semi-annual Performance Reports through the Department's grant management portal that demonstrate the performance of Alaska Broadband Grant funded project(s). Performance Reports must provide an update, using qualitative and quantitative data on how the grantee achieved progress towards project completion. Performance reports will be used to track the effectiveness of the use of funds. An annual report will also be submitted which provides additional progress information.

Performance Reports are due thirty (30) calendar days after the end date of the reporting period, except for the final report, which is due 120 calendar days or earlier after the end of the period of performance identified in this agreement or project closeout.

It is incumbent on the grantee to communicate with the Department regarding all reporting matters. In the unforeseen event that the Department's grant management portal is not operational, grantees must submit reports via email directly to the Department.

In accordance with 2 CFR 200.329, as appropriate, the Grantee agrees to submit Performance Reports that include the following information:

Information that will be submitted on a semi-annual basis (twice per year) includes the following:

- (a) Description of the types of facilities that have been constructed and installed.
- (b) Description of the peak and off-peak actual speeds of the broadband service being offered.
- (c) Identification of the maximum advertised speed of the broadband service being offered.
- (d) Description of the nonpromotional prices, including any associated fees, charged for different tiers of broadband service being offered.
- (e) A list of addresses or location identifications (including the Broadband Serviceable Location Fabric established under 47 U.S.C. 642(b)(1)(B) that constitute the service locations that will be served by the broadband infrastructure to be constructed and the status of each project.
- (f) Identification of new locations served within each project area at the relevant reporting intervals, and service taken (if applicable) and indication of whether each address or location is residential, commercial, or a community anchor institution.
- (g) List of all interconnection agreements that were requested, and their current status.
- (h) The number and amount of contracts and subcontracts awarded by the subgrantee disaggregated by recipients of each such contract or subcontracts that are Minority Business Enterprise (MBE) or Women Business Enterprise (WBE).
- (i) Certification that the pricing and service plan being offered over Funded Network(s) do not contain data usage caps for subscribers.
- (j) Speed and Latency testing – report on results of completing speed and latency testing.

Information that will be submitted on an annual basis (once per year in addition to the information listed above for the semi-annual report) includes the following:

- a) Copy of current letter of credit or performance bond in the amount identified in the grantee's award.
- b) Audited Financial Statement for Grantee organization.

- c) Copy of Active Alaska Business License
- d) Copies of any new or updated contracts with third parties.
- e) Disclosure of any new public funding sources.
- f) A copy of confirmation that data was submitted to the Federal Communications Commission Broadband Data Collection System portal demonstrating compliance with data and mapping collection standards of the FCC for broadband projects.
- g) An SF-425 Federal Financial Report form
- h) Most recent SSAE 18 SOC 3 audit for all third party vendors.

[insert below reporting requirements if project is over \$5,000,000 based on expected total cost and did not provide certification that mechanics and laborers will be paid Davis Bacon prevailing wages]

- i) Labor data:
 - a. The number of contractors and subcontractors working on the project.
 - b. The number of workers on the Project hired directly and hired through a third party.
 - c. The wages and benefits of workers on the Project by classification.
 - d. Whether those wages are at rates less than those prevailing.

[insert below reporting requirement if grantee did not provide certification that the project will use a unionized project workforce or included a pre-hire collective bargaining agreement.

- j) Report of any activity taken under the project workforce continuity plan.

02.16.03 Subgrantee Civil Rights and Nondiscrimination

Certify that the Eligible Entity will account for and satisfy authorities relating to civil rights and nondiscrimination in the selection of subgrantees.

Yes

02.16.04 Subgrantee Cybersecurity and Supply Chain Risk Management Compliance

Certify that the Eligible Entity will ensure subgrantee compliance with the cybersecurity and supply chain risk management requirements on pages 70 - 71 of the BEAD NOFO to require prospective subgrantees to attest that:

Cybersecurity

1) The prospective subgrantee has a cybersecurity risk management plan (the plan) in place that is either:

a. operational, if the prospective subgrantee is providing service prior to the award of the grant; or

b. ready to be operationalized upon providing service, if the prospective subgrantee is not yet providing service prior to the grant award;

2) The plan reflects the latest version of the National Institute of Standards and Technology (NIST) Framework for Improving Critical Infrastructure Cybersecurity (currently Version 1.1) and the standards and controls set forth in Executive Order 14028 and specifies the security and privacy controls being implemented;

- 3) The plan will be reevaluated and updated on a periodic basis and as events warrant; and
- 4) The plan will be submitted to the Eligible Entity prior to the allocation of funds. If the subgrantee makes any substantive changes to the plan, a new version will be submitted to the Eligible Entity within 30 days.

Supply Chain Risk Management

- 1) The prospective subgrantee has a SCRM plan in place that is either:
 - a. operational, if the prospective subgrantee is already providing service at the time of the grant; or
 - b. ready to be operationalized, if the prospective subgrantee is not yet providing service at the time of grant award;
- 2) The plan is based upon the key practices discussed in the NIST publication NISTIR 8276, Key Practices in Cyber Supply Chain Risk Management: Observations from Industry and related SCRM guidance from NIST, including NIST 800-161, Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations and specifies the supply chain risk management controls being implemented;
- 3) The plan will be reevaluated and updated on a periodic basis and as events warrant; and
- 4) The plan will be submitted to the Eligible Entity prior to the allocation of funds. If the subgrantee makes any substantive changes to the plan, a new version will be submitted to the Eligible Entity within 30 days. The Eligible Entity must provide a subgrantee's plan to NTIA upon NTIA's request.

Yes

Volume II Waivers

Upload an attachment(s) detailing the waiver request(s) for the requirements related to Volume II. Please draft the waiver request(s) using the Waiver Request Form template.

02.17.01 Volume II Public Comment

Describe the public comment period and provide a high-level summary of the comments received during the Volume II public comment period and how they were addressed by the Eligible Entity. The response must demonstrate:

- a. The public comment period was no less than 30 days; and
- b. Outreach and engagement activities were conducted to encourage feedback during the public comment period.

- a. The public comment period ran 30 days from November 17-December 17, 2023.
- b. The outreach and engagement activities included:
 1. Posting Initial Proposal Volume 2 to the Alaska Broadband Office Website
 2. Dedicating the three weekly regularly scheduled listening sessions to discussions about Initial Proposal Volume 2
 3. Presentations at the Alaska Municipal League Conference
 4. Dedicating regular bi-weekly meeting with the Alaska Telecom Association to Initial Proposal Volume 2
 5. Dedicating the regular bi-weekly meeting with the Alaska Federation of Natives to Initial Proposal Volume 2
 6. Discussion of Initial Proposal Volume 2 at the monthly Denali Commission broadband meeting
 7. Discussion of Initial Proposal Volume 2 at the monthly Broadband Funders and Facilitators meeting.

During the 30-day public comment period, the Alaska Broadband Office (ABO) received 28 public comments. The comments break down as follows:

six sales pitches from the likes of Fixed Wireless hardware providers, fiber providers, marketing firms and overall project management,

five were submitted by telecommunications advocates/associations,

five were submitted by telecommunications providers/Internet Service Providers (ISP),

four from universities,

two were from ANCSA Regional Corporations,

two were from individuals from the Native Community,

one from a non-profit,

one from a union,

one from a satellite provider, and

one from a private citizen.

While the comments tended toward the advocacy of the submitter, some of the comments highlighted defects in the Initial Proposal Volume 2 that drove updates to the proposal. A selection of those is: 1) having a single application per applicant. The potential comingling of the very expensive builds aggregated with the inexpensive builds would cause wildly disparate and un-scorable applications. Having a statewide application against an individual village application, would in all cases, harm the opportunity for the village application. The ABO changed to allow multiple application per applicant; 2) creating Pre-Determined Project Areas (PDPA). By having PDPAs, the ABO will have like for like applications to grade. The use of the PDPAs is recommended, but not required, and 3) Ensuring that the Low-Cost Option, the Middle-Class Affordability Option, and the Wholesale requirement do not drive new regulatory requirements. The language of all three subsections was revised based on the public comment period recommendations.

02.17.02 Volume II Supplemental Materials

As an optional attachment, submit supplemental materials to the Volume II submission and provide references to the relevant requirements. Note that only content submitted via text boxes, certifications, and file uploads in sections aligned to Initial Proposal requirements in the NTIA Grants Portal will be reviewed, and supplemental materials submitted here are for reference only.

State of Alaska IP Volume 2 Supplemental Info-12-26-2023 08-53-AK DEPARTMENT OF
COMMERCE COMMUNITY ECON-GRN-000066.pdf
