ConnectLA

Louisiana Office of Broadband Development & Connectivity

Location Modification Request Guide

GUMBO 2.0 BEAD DEPLOYMENT PROGRAM

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Disclaimer

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Version History

VERSION	DATE	DESCRIPTION OF CHANGE
1.0	06.03.26	Original Version
2.0	09.17.26	Updates made to reflect the latest NTIA reason code guidance including “Using BEAD Non-Service Reason Codes During the Period of Performance,” “Frequently Asked Questions and Answers Version 23”, and How to submit Modification Requests in the Portal.

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Introduction

A Broadband Serviceable Location (BSL), as defined in the Broadband, Equity, Access and Deployment (BEAD) program, is “a business or residential location in the United States at which fixed broadband Internet access service is, or can be, installed.” BSLs are identified by a Location ID from the Federal Communications Commission’s (FCC) National Broadband Map. The term “community anchor institution,” or CAI, means “an entity such as a school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, public housing organization, or community support organization that facilitates greater use of broadband service by vulnerable populations, including, but not limited to, low-income individuals, unemployed individuals, children, the incarcerated, and aged individuals.” A project area is a set of BEAD-eligible BSLs and CAIs locations – together referred to as “locations” – that function as an application unit for GUMBO 2.0 applications (Sections 2.4.1 and 2.4.6 of Initial Proposal Volume 2, FAQ V2, #12a).

During project implementation, changes may be identified that affect BSLs or CAIs included in an approved project. These changes may be identified by ConnectLA through ongoing, proactive program administration or by a subgrantee based on information identified during project implementation. Where appropriate, ConnectLA will review and process location modifications in accordance with applicable program requirements and coordination with the subgrantee. Additionally, subgrantees may initiate request to change a project’s scope to remove locations under applicable Reason Codes by submitting a Location Modification Request for review. Modifications to project areas may involve the removal, reclassification, or coordinate correction of locations. A modification may include removal through the applicable NTIA No BEAD Location reason-code process, reclassification, or coordinate correction. These requests must be supported by clear evidence and tied to National Telecommunications and Information Administration’s (NTIA) designated Reason Codes, which provide the standardized framework for documenting why a location is being adjusted.

Each BEAD-eligible location must remain accounted for in ConnectLA’s project records. A location must either remain assigned to an approved deployment project or be documented as a No BEAD Location with the applicable NTIA Reason Code and supporting evidence. The process is designed to maintain alignment with NTIA’s guidance governing BEAD-eligible locations, including the BEAD Restructuring Policy Notice, Using BEAD Non-Service Reason Codes During the Period of Performance, the BEAD Frequently Asked Questions (FAQ) (Version 23 at the time of this guidance release) and, where a location modification may constitute a change to an approved project scope, NTIA’s Scope Change and Budget Modification Guidance for Eligible Entities. Consistent with current NTIA guidance. Reason Codes 1 through 3 will be applied by the Office when applicable during the period of performance. Reason Codes 4 through 7 *may* be applied by the Office in accordance with applicable NTIA requirements and ConnectLA procedures.

ConnectLA Administered Location Review

Reason Codes 1 through 3 must be utilized, when applicable, throughout the period of performance. ConnectLA will administer the review and removal of locations that may qualify under Reason Code 1

(No Broadband Connection), Reason Code 2 (No Demand for Mass-Market Broadband Service), or Reason Code 3 (Removal from FCC's Fabric).

As part of this process, ConnectLA will review each semi-annual version of the FCC Fabric to identify BSLs within BEAD subgrants that may qualify for removal under Reason Codes 1 through 3. ConnectLA will periodically provide each subgrantee with a summary of any identified locations for review.

Per NTIA's Scope Change and Budget Modification Guidance for Eligible Entities, if a subgrantee has reason to believe that an identified BSL should remain in the BEAD project, the subgrantee may provide reasonable evidence supporting continued inclusion of the BSL. Subgrantees must produce such evidence within ten (10) days of receiving a summary. ConnectLA will review the evidence and, at its discretion, determine whether the BSL should remain in the project.

In the event that a given subgrant sees a material reduction in locations from Reason Codes 1 through 3 removals, the state reserves the right to raise the possibility of appropriate budget changes with the subgrantee; however, the state does not expect to make budget changes for the small changes in the Fabric that are expected in normal course.

Scope Change Request

The Location Modification Request process allows subgrantees to request approval for a change in the Project Scope of Work under a Subgrant Award. This includes subgrantee-initiated requests to remove BSLs under NTIA Reason Codes 4 through 7, the application of which are optional but may be requested based on reasonable supporting evidence. All requests must be submitted electronically by the subgrantee through ConnectLA's compliance portal, and ConnectLA will review such requests and exercise its discretion to approve the proposed modification in accordance with applicable NTIA requirements, ConnectLA procedures, and the program objective of achieving universal broadband coverage in Louisiana.

The Location Modification Request will be reviewed by ConnectLA in accordance with the terms of 2 CFR 200.308, the BEAD Program General Terms and Conditions, and all project-specific requirements. Once a decision has been made on the proposed Location Modification Request, the subgrantee will be notified. The Location Modification Request decision will become a permanent part of the grant record, and the subgrant award record may be updated as appropriate.

The subgrantee must submit a written justification and applicable reason code for the Location Modification Request and provide supporting documentation for the request. The supporting documentation must be provided with the Location Modification Request and should be sufficient to support the justification for the Location Modification Request consistent with NTIA's Scope Change and Budget Modification Guidance for Eligible Entities and as set forth in greater detail below.

A Location Modification Request may result in changes to the approved project scope, BEAD location inventory, or project budget. As such, all location modification requests submitted by subgrantees are

subject to review by ConnectLA to determine whether the proposed change may be processed administratively or requires submission to NTIA for approval.

Subgrantees are responsible for submitting complete requests supported by sufficient documentation and appropriate NTIA Reason Codes. ConnectLA is responsible for evaluating the request, determining the appropriate classification of the proposed change, and identifying whether additional state or federal review is required.

Location Modification Request Types

As part of the ConnectLA BEAD Program, subgrantees may submit formal requests to modify their approved locations. Modification requests must be justified, documented, and submitted in accordance with this guide. Below are the approved categories of modification requests that subgrantees may pursue:

1. **Removal of Locations** – A subgrantee may request the removal of location where the location is determined to be non-existent, not serviceable, or otherwise ineligible for BEAD funding based on sufficient supporting documentation and applicable NTIA Reason Codes.
2. **Reclassification of Technology** – A subgrantee may request reclassification of the technology type associated with a location where a network design change results in a different technology being used to serve the location.
3. **Coordinate Modification of Locations** – A subgrantee may request a correction to the geographic coordinates of a location when mapping errors are identified, ensuring the location is accurately represented within the awarded project area.

Removal of Locations

ConnectLA recognizes that scope changes may occur following Final Proposal approval and will administer such changes in accordance with NTIA guidance. ConnectLA will assess the need to administer Reason Codes 1 through 3 and may also approve location modifications under Reason Codes 4 through 7 without prior NTIA approval, provided the change does not exceed twenty percent (20%) of BSLs or two hundred (200) BSLs within a single project, whichever is less. These changes will be reported through required Semi-Annual Reports (SARs). Modifications that exceed these thresholds or otherwise constitute material changes to project scope, including changes in technology or project termination, may require submission to NTIA and, where applicable, the National Institute of Standards and Technology (NIST) for review and approval prior to implementation. All scope changes must comply with applicable federal requirements, including 2 CFR 200.308, BEAD Program General Terms and Conditions, and environmental and permitting obligations.

ELIGIBLE NTIA REASON CODES

- **Reason Code 1**: No Broadband Connection – Location should not have a broadband connection.
    - This request will require an FCC Location Challenge
    - This Reason Code includes subcodes for the following:

NON-SERVICE CODES	SUB-CODES
Location has been demolished and is not expected to be rebuilt	D
Residential location is not habitable	B
Location is a support structure (e.g., a garage, parking structure, barn, silo, storage shed) to a nearby building	U
Location is intended to be mobile and has not been permanently installed in its current location (e.g., it is an RV or boat)	M
Location is not a building but a land or natural formation, such as a large rock or collection of hay bales	R
Location is not serviceable for another reason	Z

- **Reason Code 2**: No Demand for Mass-Market Broadband Service – Location does not need mass-market broadband service due to the nature of internet use.
    - This request will require an FCC Location Challenge
    - This Reason Code includes subcodes for the following:

NON-SERVICE CODES	SUB-CODES
Enterprise location	E
CAI location	C
Government property	P

Note: This reason code may not be applicable to CAIs if the requested location could benefit from mass-market service.

- **Reason Code 3**: Removal from FCC's Fabric – Location has been removed from the latest version of the FCC Fabric, and the Eligible Entity has verified it is not a serviceable location.

- **Reason Code 4**: Enforceable Commitment – Location is subject to an enforceable commitment and must be depicted in the FCC Funding Map.

NON-SERVICE CODES
State enforceable commitment (includes local and county level ECs)
Federal enforceable commitment (BIP, CAFII, ECAM, RDOF, RECONNECT, TBCP1, TBCP2, Community Connect, TLP)

- **Reason Code 5**: Served by Non-Subsidized Service – There is evidence that the location is already served by non-subsidized service (i.e., a network built by an ISP with private funds) that meets BEAD technical standards.
  - This reason code cannot be applied to locations serviced by low-earth orbit satellite service.
  - Reason Code 5 may only be used upon mutual agreement between ConnectLA and the subgrantee if the locations in question are the subject of a subrecipient agreement (FAQ v23 §§ 9.10–9.11).
- **Reason Code 6**: Other (applicable in limited situations) – Any other reasons that are not listed, including justification for why the BSLs cannot be removed with another Reason Code.
- **Reason Code 7:** Financially Incapable – After all attempts to obtain cost-effective proposals have been exhausted, all proposals for serving the unserved or underserved location were deemed excessively costly by NTIA..

NON-SERVICE CODES	SUB-CODES
Financially incapable	F
Excessive Cost	X

Note: NTIA approval is required when utilizing Reason Codes 4 through 7 if requesting to remove ≥200 BSLs or 20% of BSLs (whichever is fewer) from a single BEAD Project in a given SAR period.

Reclassification of Location Technology

A proposed change in the technology type used to serve awarded locations constitutes a material modification to the approved project and will be subject to review by ConnectLA and must be submitted to NTIA for approval.

Such requests must include sufficient documentation to support the revised technology classification, including an explanation of the design change, confirmation that the proposed technology continues to

meet BEAD minimum performance requirements (speed, latency, and reliability), and identification of any associated impacts to project budget, cost per location, or reporting data.

Reclassification requests must also include a narrative summary explaining the reason for the change and demonstrating that the modification remains consistent with program requirements. Where the proposed reclassification results in a material change to the approved project scope, budget, or performance commitments, the request may be treated as a Scope Change and subject to additional review and approval by ConnectLA and, where applicable, NTIA.

Coordinate Modification of Locations

Subgrantees may request updates to the geographic coordinates of BSLs and CAIs when mapping inaccuracies are identified. If the wrong location on the parcel has been identified for a BSL or a CAI that has a Location ID, subgrantees are able to submit a location challenge to the FCC's National Broadband Map. Where a CAI does not have a Location ID, subgrantee's need not file a location challenge to the National Broadband Map.

Prior to notifying ConnectLA of the coordinate modifications, subgrantees must first submit a formal FCC Fabric Location Challenge through the FCC Broadband Data Collection (BDC) system for BSLs. Proof of the submitted FCC Challenge will be required as supporting documentation.

Subgrantees may also submit additional supporting documentation, such as maps, GIS shapefiles, or field verification reports.

Standards for Documentation

- Evidence must directly support the NTIA Reason Code selected for the request.
- Documentation must be legible, dated, and clearly tied to the location(s) under review.
- Multiple forms of evidence are encouraged when feasible, as ConnectLA may require more than one source of proof for approval.

Location Modification Request Procedure

To request a Location Modification, subgrantees must complete the following steps:

Step 1: Identify the Modification Category

The subgrantee must first identify the type of modification being requested. Requests generally fall into one or more of the following categories:

- Removal
- Reclassification of Technology

- Modification of coordinates

Subgrantees should also identify if this request may potentially impact the scope or approved budget.

Step 2: Evaluate Potential Scope and Budget Impacts

Prior to submission, the subgrantee should evaluate whether the proposed modification may:

- Result in the removal of more than twenty percent (20%) of BSLs or two hundred (200) BSLs within a single project, whichever is less, for reason codes 4 through 7
- Result in a change to the approved technology type
- Impact the approved project design or service delivery approach
- Affect total project cost, cost per location, or match commitments

Subgrantees are not responsible for making final determinations regarding NTIA approval requirements but must provide sufficient information to support ConnectLA's evaluation.

Step 3: Gather Supporting Documentation

The subgrantee must collect and retain all documentation necessary to support the modification request. Documentation should be sufficient to demonstrate:

- The condition or issue affecting the location
- The basis for the requested modification
- Any applicable NTIA Reason Code justification
- Any impacts to project design, technology, or budget

Acceptable documentation may include photographs, service records, attestations, GIS shapefiles, speed tests, maps, and other supporting materials.

Step 4: Complete FCC Requirements (If Applicable)

Where a modification request involves a correction to location status or availability that requires alignment with FCC data, the subgrantee must:

- Submit a challenge through the FCC Broadband Data Collection (BDC) system, where required
- Retain documentation of the submission

Not all BSL Modification Requests require FCC challenges. Subgrantees should complete this step where applicable.

Step 5: Submit Request to ConnectLA

The subgrantee must submit a complete Location Modification Request through the ConnectLA compliance portal, including:

- Completed request form (one per project area, unless otherwise directed)
- All supporting documentation
- Identification of applicable NTIA Reason Codes
- Description of any potential scope, technology, or budget impacts
- Proof of FCC submission, if applicable

Incomplete submissions may be returned for additional information.

Step 6: ConnectLA Review

ConnectLA will review each request for completeness, documentation, and alignment with program requirements.

ConnectLA will determine whether the request:

- may be processed administratively, or
- requires submission to NTIA and, where applicable, NIST

This determination includes evaluation of No BEAD Location thresholds, scope change considerations, technology changes, and budget impacts. For requests involving removal of Locations under Reason Codes 4 through 7, NTIA approval will be required where the cumulative change exceeds twenty percent (20%) of BSLs or two hundred (200) BSLs within a single project, whichever is less.

ConnectLA Administered Location Review Procedure

For locations identified by ConnectLA as potentially qualifying for removal under Reason Codes 1 through 3, the following review process will apply:

Step 1: Subgrantee Review

ConnectLA will provide the subgrantee with the identified BSLs for review. The subgrantee should review the identified locations and determine whether it has reasonable evidence demonstrating that a BSL should remain in the BEAD project.

Step 2: Submit Supporting Evidence, if Applicable

If the subgrantee believes an identified BSL should remain in the project, the subgrantee may submit reasonable supporting evidence to ConnectLA for consideration within ten (10) days of receiving a summary. If no evidence is submitted, no action is required from the subgrantee.

Step 3: ConnectLA Determination

ConnectLA will review any evidence provided and make the ultimate determination regarding whether the identified BSL should remain in the project or be removed under the applicable Reason Code.

Step 4: Update Project Records

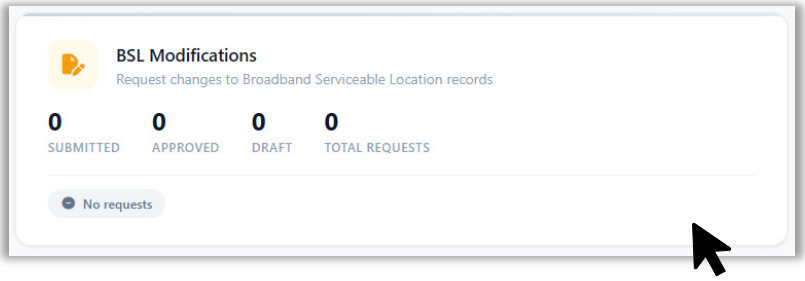
For BSLs determined to qualify for removal, ConnectLA will update the applicable No BEAD Locations CSV file through the required Semi-Annual Reporting process and update project records as appropriate.

Submit a Location Modification Request

Subgrantees must submit Location Modification Requests electronically through ConnectLA's compliance portal, Data Roux Vue. The following steps describe how to create and submit a BSL Modification Request within the portal.

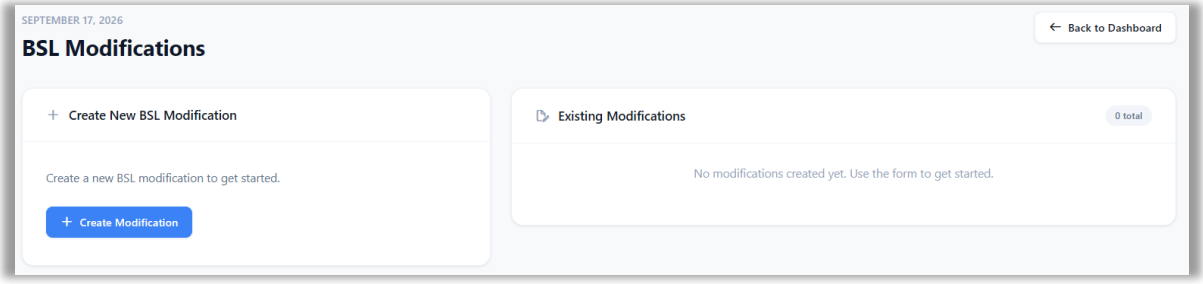
Step 1: Access BSL Modifications and Create New Request

❶ Navigate to the **BSL Modifications** card on the dashboard.



The dashboard displays the number of modification requests submitted, approved, drafting, and total requests.

❷ Click the card to open the BSL Modifications screen.

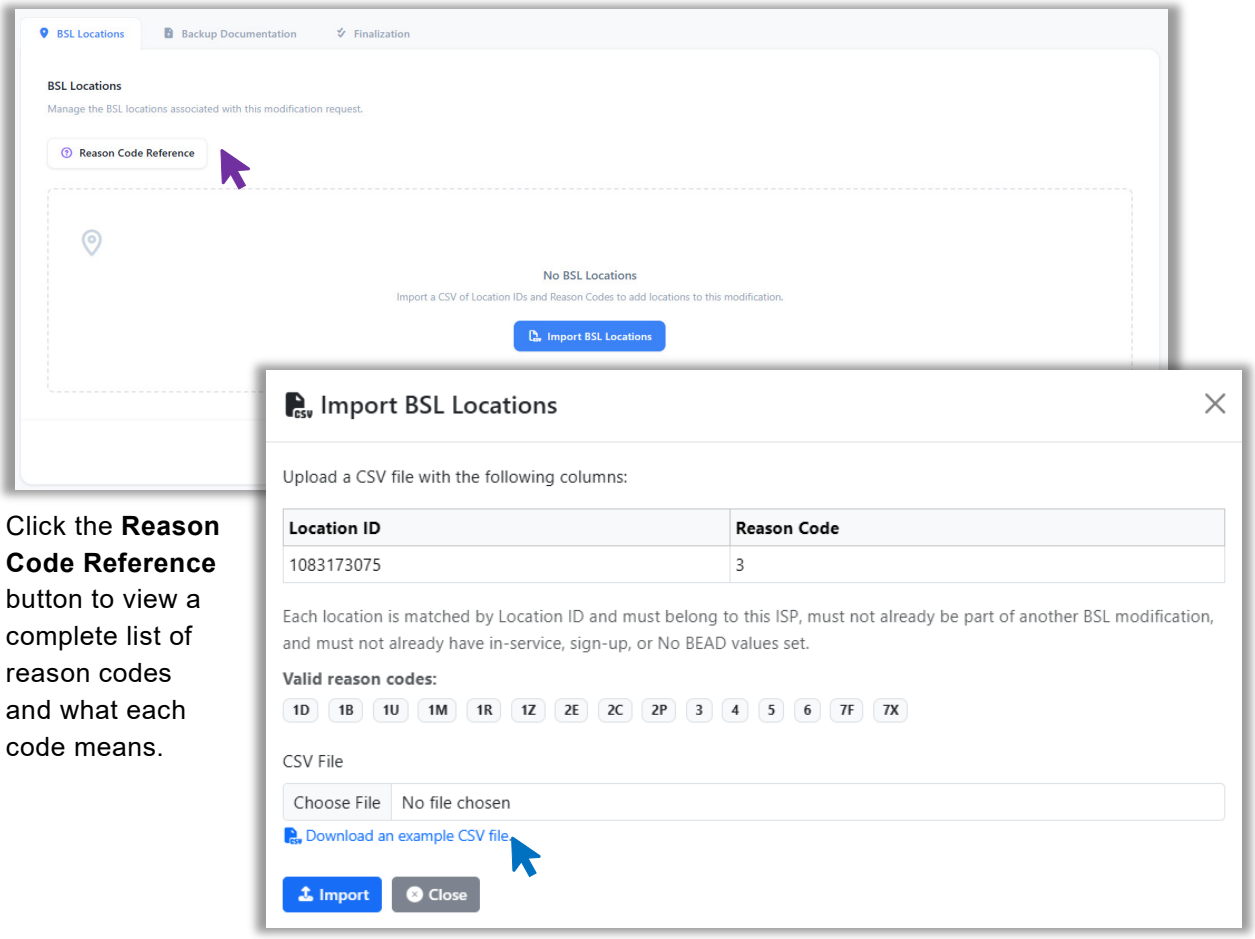


❸ Click the **+Create Modification** button to start a new request.

A new modification request will be created and assigned a unique **BSL Modification ID**. The request will remain in **Draft** status until it is completed and submitted. Existing modifications can also be viewed and accessed from this screen.

Step 2: Add BSL Locations

❶ On the **BSL Locations** tab, click the **Import BSL Locations** button.



Click the **Reason Code Reference** button to view a complete list of reason codes and what each code means.

❷ Upload a Locations CSV file with the required fields and columns. An example CSV file is available to download from this screen.

REQUIRED FIELD	DESCRIPTION
Location ID	FCC Location ID for the BSL included in the request
Reason Code	Application NTIA Non-Service Reason Code for the requested removal

The portal will validate the Reason Code entered for each BSL and will validate each Location ID before accepting the upload. Each location must:

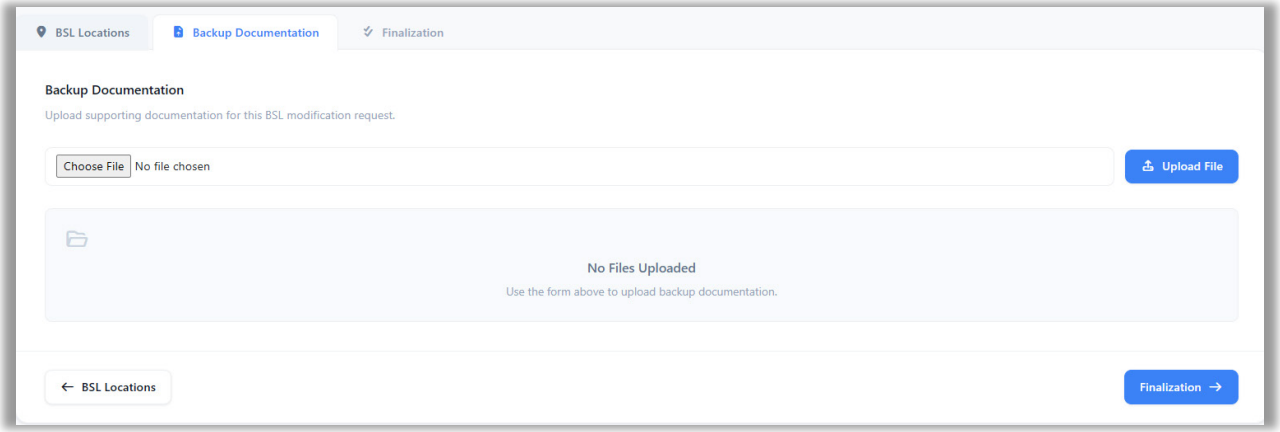
- belong to the applicable subgrantee;
- not already be included in another BSL Modification Request; and
- not already have conflicting in-service, sign-up, or No BEAD information recorded in the system.

❸ Click the **Import** button to complete.

Step 3: Upload Supporting Documentation

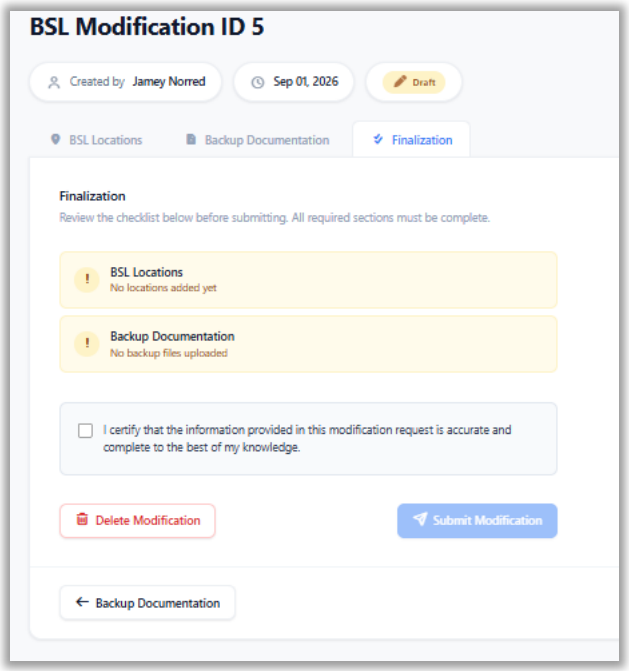
❶ On the **Backup Documentation** tab, click **Choose File** to select a file to upload.

Supporting documentation should provide sufficient evidence to support the requested modification and applicable Reason Code. Documentation may include photographs, attestations, service records, maps, GIS information, network documentation, or other reasonable evidence supporting the request.



❷ Click the **Upload File** button to add the file. Multiple files may be uploaded as necessary to adequately document the modification request.

Step 4: Review and Submit Request



❶ On the **Finalization** tab, review the request before submitting.

The portal will identify whether required components of the request are complete, including:

- **BSL Locations**; and
- **Backup Documentation**.

Any incomplete section must be addressed before the modification request can be submitted.

Subgrantees should review all Location IDs, Reason Codes, and supporting documentation for accuracy prior to finalization.

❷ Check the **Certification Box** to certify the request.

Once all required sections are complete, the subgrantee must certify that: **"The information provided in this modification request is accurate and complete to the best of my knowledge."**

❸ Click the **Submit Modification** button to complete.

The modification request will then be submitted to ConnectLA for review. Once submitted, ConnectLA will evaluate the request, supporting documentation, applicable Reason Codes, and any associated scope or budget impacts in accordance with applicable program requirements.

Post-Decision Actions

Following ConnectLA's review of a Location Modification Request, a determination of the request's sufficiency will be made based on applicable NTIA requirements, including evaluation of No BEAD Location thresholds, scope change considerations, technology changes, and budget impacts. ConnectLA will also determine whether the proposed modification may be processed administratively or requires submission to NTIA and/or NIST.

If the request is within ConnectLA's authority to approve or reject, ConnectLA will update project records and applicable reporting files and amend the Subgrant Agreement, as necessary. Approved changes will be incorporated into ConnectLA's Semi-Annual Report (SAR) submissions to NTIA, consistent with federal reporting requirements. Subgrantees may not implement such changes until formal written approval has been received and ConnectLA has provided authorization to proceed.

If a request exceeds NTIA established thresholds or otherwise constitutes a material scope or budget change, ConnectLA will coordinate submission of the proposed modification to NTIA. NTIA guidance requires that certain changes, including those exceeding allowable No BEAD Location thresholds or involving scope or budget modifications, be reviewed and approved prior to implementation. Subgrantees may not implement such changes until formal written approval has been received and ConnectLA has provided authorization to proceed.

If the request is denied, the subgrantee remains responsible for fulfilling all obligations under the original award, including service to all awarded locations. Requests may be resubmitted if new or additional supporting documentation becomes available.

Property Access Escalation Procedure

A subgrantee may encounter circumstances where it is temporarily or persistently unable to obtain access to private property necessary to complete installation of broadband service to an awarded BSL within ten (10) business days. Examples may include owner refusal, landlord denial, inability to obtain required easements, gated property access restrictions, or other documented barriers preventing installation.

Because awarded BSLs are part of the approved project scope, removal, reclassification, or exclusion of a BSL is not the first course of action and shall be considered only after reasonable efforts to obtain access have been exhausted.

Subgrantees must complete all appropriate outreach, scheduling, and access attempts before escalating the matter to ConnectLA for review.

Identify Access Issue

Subgrantees should distinguish the difference between a temporary access issue and a permanent access issue. An example of a temporary access issue would be a non-responsive owner; whereas, a Permanent access issue would be where the owner refuses, easement denied or HOA bars the installation.

Documentation of Reasonable Effort

Prior to submitting an Escalation Request, the subgrantee must demonstrate that reasonable, good-faith efforts were made to obtain access and complete installation. Reasonable effort is intended to ensure that awarded locations are not prematurely removed from project obligations due to temporary or resolvable access issues.

Subgrantees remain responsible for documenting all efforts undertaken. ConnectLA will evaluate the totality of the circumstances when determining whether escalation, additional attempts, alternative project design, or further review is appropriate.

EFFORT REQUIREMENTS

Where access depends on a non-occupant controlling party, the subgrantee should make reasonable efforts to identify and contact the appropriate party.

Unless otherwise approved by ConnectLA, the subgrantee should complete the following actions, as applicable:

1. **Multi-Channel Outreach Attempts**

   The subgrantee should make multiple documented attempts to contact the occupant, subscriber, property owner, landlord, HOA, or other responsible party using available communication methods. Outreach should be reasonably spaced over time and may include:

   - Telephone calls
   - Emails
   - Text messages
   - Online scheduling requests
   - Other customary contact methods

   Documentation should include the date, method, recipient (if known), and result of each attempt.

2. **Written Notice**

   Where direct contact is unsuccessful, the subgrantee should issue at least one written notice advising that broadband service is available or pending installation and requesting the responsible party to contact the provider to coordinate access. Written notice may include:

   - Mailed letter
   - Door hanger / door tag
   - Posted field notice, where appropriate
   - Copies of notices should be retained.

3. **Alternative Installation Review**

   Before escalation, the subgrantee should evaluate whether a reasonable alternative installation method or route exists that would allow service without requiring the contested access point. Examples may include:

   - Alternate drop path
   - Different handoff location
   - Adjacent utility route
   - Modified equipment placement

   If no practical alternative exists, the subgrantee should document why.

CONNECTLA REVIEW AND POTENTIAL NEXT STEPS

Upon receipt of the Escalation Request, ConnectLA will review the submission to determine whether the subgrantee has demonstrated reasonable, good-faith efforts to obtain access and whether additional action is warranted. ConnectLA may consider the totality of the circumstances, including the nature of the access issue, the documentation provided, project design constraints, milestone impacts, and available alternatives. Below includes potential outcomes and actions required for the next steps.

Outcome	Action
Resolved	Proceed with service
Retry Required	Additional Subgrantee effort
Alternative Design	Update plans
Pending	Hold for later attempt
Last Resort Review	Consider location modification

Additional Resources

Subgrantees are encouraged to refer to resources provided and updated by NTIA and the FCC. The following are resources that may be beneficial for subgrantees to review:

- BEAD Restructuring Policy Notice - https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf
- Using BEAD Non-Service Reason Codes During the Period of Performance - Using_BEAD_Non-Service_Reason_Codes_During_Period_of_Performance.pdf
- Scope Change And Budget Modification Guidance For Eligible Entities - BEAD_Eligible_Entity_Guidance_Scope_Change_and_Budget_Modification.pdf
- BEAD Frequently Asked Questions and Answers - Broadband, Equity, Access and Deployment (BEAD) FAQs | BroadbandUSA
- BEAD Final Proposal Guidance for Eligible Entities - Broadband Equity, Access, and Deployment (BEAD) Program: Final Proposal Guidance for Eligible Entities
- FCC Fabric Challenge Process - Fabric Challenge Process – BDC Help Center



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