



**ConnectLA**

Louisiana Office of Broadband  
Development & Connectivity

# APPROVED FINAL PROPOSAL

VERSION 7.0 | NOVEMBER 18, 2025

# Message from the Executive Director

*“Telehealth, telework and online classes demand broadband expansion. As Governor, I will make sure Louisianans without broadband access receive the same educational and work opportunities that those with high-speed internet already enjoy.” – Governor Jeff Landry*

On behalf of ConnectLA and the people of the state of Louisiana, I am proud to share that Louisiana continues to lead the nation when it comes to closing the digital divide and supporting Governor Landry’s vision outlined in his statement above.

On June 6, 2025, the U.S. Department of Commerce’s National Telecommunications and Information Administration (NTIA) issued a policy notice introducing a restructuring of the Broadband Equity, Access, and Deployment (BEAD) program aimed at removing rules favoring particular technologies and eliminating unnecessary regulatory burdens, among other reforms.

Since then, our team at ConnectLA has worked rapidly to respond to this new guidance and align our efforts accordingly. As the first state in the country to make provisional awards for BEAD-funded projects, we were able to leverage significant learnings from those efforts to expedite our work and the results outlined in this Final Proposal. We carefully designed and ran a process as part of our “Benefit of the Bargain” award round to minimize costs, maximize results, and prioritize projects that can be easily scaled with the necessary capacity to support real-time emerging needs and long-term demands.

I am pleased to share that this process worked. Our efforts in Louisiana have always been driven by a free-market framework that encourages competition, and this new federal guidance only reinforced that posture – emphasizing lowest-cost proposals from internet service providers and adopting a tech-neutral focus that would help us secure the best deal possible for Louisianians. The results are clear:

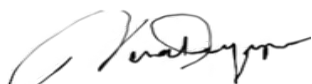
- This approach and process enabled us to realize approximately **\$250 million in savings** through the Benefit of the Bargain award round, greater access for alternative technologies to participate, and reduced regulatory hurdles that often drive increased costs.
- Our **average cost per passing**, or what it takes to serve a location with high-speed internet, reduced from \$5,355 to \$3,902 – **a decrease of nearly 30%**.
- There are **no locations where the cost per passing exceeds \$8,000** – an incredible benchmark that our team used to eliminate excessively high-cost applications and one that ensures investments in our broadband infrastructure are both reasonable and competitive.
- With **82% of these awards going to Louisiana-based providers**, we are not only closing the digital divide but strengthening our local economy. These investments will unlock unprecedented opportunities **for economic development, education, and expanded healthcare** access in every corner of our state.

As we submit this Final Proposal for public and federal review, our focus will immediately shift to sustaining the speed, efficiency, collaboration, and results that have defined ConnectLA—from enforcing construction timelines and quality standards to coordinating with officials and removing bureaucratic barriers that hinder progress.

I am thankful to our partners at NTIA and the Trump Administration for providing the policy leadership that made these substantial savings possible while still fully enabling and supporting our efforts to close the digital divide in Louisiana. Under the leadership of Governor Landry, and in close partnership with thousands of partners across the state, our team at ConnectLA stands ready to guide and monitor this investment as we swiftly work to fulfill this promise.

We welcome your comments and questions by emailing us at [connect@la.gov](mailto:connect@la.gov) or visiting our website at [connect.la.gov](http://connect.la.gov).

In partnership,



Veneeth Iyengar, Executive Director



**Note:** This document is intended solely to assist recipients in better understanding BEAD Final Proposal and the requirements set forth in the Notice of Funding Opportunity for this program. This document is not intended to supersede, modify or otherwise alter applicable statutory or regulatory requirements or the specific application requirements set forth in the NOFO. In all cases, statutory and regulatory mandates, and the requirements set forth in the NOFO, shall prevail over any inconsistencies contained in this document.

## Version History

VERSION	DATE	CHANGES
1.0	11/18/2024	Draft version released for public comment.
2.0	12/12/2024	Updated to incorporate NTIA initial review comments and updated NTIA Final Proposal Guidance v1.2 Draft version pending NTIA approval.
3.0	12/18/2024	Final draft pending NTIA approval (updated for clarity, consistency, and detail in sections 8.3, 8.7, and 8.8).
4.0	12/21/2024	Final draft pending NTIA approval (updates for clarity, consistency, and detail in section 1.1).
5.0	8/8/2025	Updated to incorporate new guidance per NTIA's BEAD Restructuring Policy Notice, including reporting results of Benefit of the Bargain. Draft released for public comment.
6.0	8/15/2025	Final draft pending NTIA approval (updates for clarity, consistency, and detail in sections 3.1 and 5).
7.0	11/18/2025	Final approved version



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## Acronyms

ACRONYM	DEFINITION
BABA	Build America, Buy America Act
BEAD	Broadband Equity, Access, and Deployment
BOB	Benefit of the Bargain
BSLs	Broadband Serviceable Locations
CAIs	Community Anchor Institutions
COI	Conflicts of Interest
ConnectLA	Louisiana Office of Broadband Development and Connectivity
EHCPLT	Extremely High-Cost Per Location Threshold
FCC	Federal Communications Commission
Gbps	Gigabits per second
GUMBO	Granting Unserved Municipalities Broadband Opportunities
IIJA	Infrastructure Investment and Jobs Act
IPv2	Initial Proposal, Volume II
ISP	Internet Service Provider
LAPDD	Louisiana Association of Planning and Development Districts
LCSO	Low-Cost Service Option
LEO	Low Earth Orbit
Mbps	Megabits per second
NOFO	Notice of Funding Opportunity
NTIA	National Telecommunications and Information Administration
PBP	Priority Broadband Projects
RPN	Restructuring Policy Notice
SPAs	Sub-Project Areas
ULFW	Unlicensed Fixed Wireless



# Final Proposal Data Submission

## 0.1 Supporting Documentation for Subgrantees

Complete and submit the Subgrantees CSV file (named “*fp\_subgrantees.csv*”) using the NTIA template provided.

See Exhibit A.

## 0.2 Supporting Documentation for Deployment Projects

Complete and submit the Deployment Projects CSV file (named “*fp\_deployment\_projects.csv*”) using the NTIA template provided.

See Exhibit B.

## 0.3 Supporting Documentation for Locations

Complete and submit the Locations CSV file (named “*fp\_locations.csv*”) using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.

See Exhibit C.

## 0.4 Supporting Documentation for No BEAD Locations

Complete and submit the No BEAD Locations CSV file (named “*fp\_no\_BEAD\_locations.csv*”) using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.

See Exhibit D.

## 0.5 Certification to Serve CAIs

If the Eligible Entity intends to use BEAD funds to serve CAIs, does the Eligible Entity certify that it ensures coverage of broadband service to all unserved and underserved locations, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2)?

Yes.



## 0.6 Supporting Documentation for CAIs Locations

Complete and submit the CAIs CSV file (named “*fp\_cai.csv*”) using the NTIA template provided. Although CAIs are not included under (f)(1) deployment projects, to confirm the Eligible Entity’s compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTIA template is required. The Eligible Entity must only include CAIs funded via BEAD in this list; the Eligible Entity may not propose funding CAIs that were not present on the approved final list from the Eligible Entity’s Challenge Process results.

See Exhibit E.



# Section 1 Subgrantee Selection Process Outcomes (Requirement 1)

## 1.1 Consistency with Initial Proposal Volume II

**Describe how the Eligible Entity’s deployment Subgrantee Selection Process undertaken is consistent with that approved by NTIA in Volume II of the Initial Proposal as modified by the BEAD Restructuring Policy Notice.**

Louisiana’s GUMBO 2.0 plan for awarding BEAD subgrants contained 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, consistent with the approved Initial Proposal Volume II (IPv2) as modified by Louisiana’s agreement to conform to the requirements of the June 6 Restructuring Policy Notice (RPN).

ConnectLA provided comprehensive participant guidance for the Benefit of the Bargain round in Louisiana via the [Supplemental Notice to Prospective Participants in Louisiana’s Broadband Equity Access and Deployment Subgrant Process \(GUMBO 2.0\)](#)<sup>1</sup> (Supplemental Notice 8.0).<sup>2</sup> This provided notice that all prior awards were rescinded; that non-statutory requirements were eliminated; that technology neutrality would be applied throughout the selection process; and that certain eligible BSLs would be adjusted according to the requirements of the RPN.

Supplemental Notice 8.0 also established a timeline for the opening and closing of the BOB round application window; specified allowable primary and secondary scoring rubrics; and outlined how ConnectLA planned to assess the statutory definition of Priority Broadband Projects (PBP). In short, Supplemental Notice 8.0 provided a clear translation for Louisiana applicants of the changes to the prior IPv2 mandated by the RPN.

As specified in the Louisiana IPv2 as modified, in implementing the BOB round, GUMBO 2.0 used an overall approach of organizing all eligible locations in the state into a set of pre-defined areas, or “sub-project areas” (SPAs), based on detailed analysis of minimum scale project areas that could support viable projects and ConnectLA’s experience from prior BEAD rounds.

The prior application portal was modified to allow applicants to exclude any BSLs from a project area the applicant determined to be excessively high-cost locations (or would otherwise make the project economically unviable for the technology being used) and to specify a single BEAD funding request amount for the applicable area. Based on these two applicant inputs, the scoring engine determined the BEAD funding request per location for each application. GUMBO 2.0 BOB adopted a “prioritized

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<sup>1</sup> See <https://connectla-backend.files.svdcn.com/production/Resources/GUMBO-2.0/Supplemental-Notice-V-8.0.pdf>





<sup>2</sup> A companion Supplemental Notice 7.0 provided detailed instructions for the re-opening of the pre-qualification window for any entity not already qualified via Louisiana’s prior efforts.



cascade” approach to secondary scoring of any applications within 15% of the lowest cost application: full secondary points were awarded to prior awards if available; then if no prior awards were available, to the best speed of network and other technical capabilities; and then if all options were equal technically, to the application with the fastest speed of deployment.

ConnectLA scored and ranked all applications for the same general project area for which PBP status was sought prior to evaluating the evidence filed in support of the PBP claim. ConnectLA then eliminated from consideration any application that requested more than \$8,000 in grant per eligible location as excessively high cost. ConnectLA then evaluated the sufficiency of the PBP claim for the highest scoring application using the methodology described below. If ConnectLA determined that the highest scoring application carried the burden for the application project area in question of (a) demonstrating that it met the required speed and latency standards set forth in the statute and the NOFO and (b) demonstrating that it meets the additional statutory criteria, including that the project can easily scale speeds over time to support evolving connectivity needs and the deployment of 5G and successor wireless technologies, ConnectLA designated the application for preliminary award. If ConnectLA determined that the highest scoring application did not carry the burden described above, ConnectLA designated the application as a non-priority broadband project, placed the application in queue for later consideration if appropriate, and moved on to evaluating the PBP claim of the next highest scoring application.

The BOB Round in Louisiana drew heavily on the applicant training and education materials and processes developed in 2024 with respect not only to the GUMBO 2.0 application portal but also to the many baseline requirements of the BEAD program left unchanged by the RPN. For context, a brief recap of that 2024 activity includes: ConnectLA developed a robust suite of informational materials and resources for those interested in applying for ConnectLA’s portion of BEAD funding, including frequently asked questions, a comprehensive pre-qualification guide, a series of maps of eligible BSLs for each parish, and resources surrounding the state’s BEAD challenge process. These resources were prominently featured on ConnectLA’s website and actively promoted at statewide stakeholder meetings.

-  [Frequently Asked Questions](#)
-  [Pre-qualification Guide](#)
-  [Series of Maps for each Parish](#)
-  [BEAD Challenge Process Resources](#)

During the BOB round, Louisiana received applications for all but two project areas that contained a total of 18 eligible BSLs (all of which were Community Anchor Institutions (CAIs)). In addition, preliminarily selected applications excluded a total of 1,174 eligible BSLs. As a result, upon preliminary selection of submitted BOB round applications a total of 1,192 “orphan” BSLs remained, comprising 521 unserved or underserved BSLs and 671 CAIs. Of the orphan CAIs, ConnectLA conducted additional investigation to determine whether at least 100/20 service was available. There are 210 BSLs and 148 CAIs that already have at least 100/20 service. Finally, as a final direct negotiation step, Connect LA negotiated with providers to award the remaining BSLs, 2 to a fiber provider and 309 to a LEO provider; 523 CAIs are not funded.



A full timeline of Louisiana’s BEAD rounds, including prior 2024 rounds as well as the 2025 BOB round is provided below:

<b>APPLICATION SUBMISSION AND REVIEW TIMELINES</b>	<b>DATE</b>
Pre-qualification Window Opened	July 1, 2024
Pre-qualification Window Closed	July 14, 2024
<b>Pre-qualification – All selection activities complete, and pre-qualification determination letters sent to applicants</b>	<b>August 9, 2024</b>
Round 1 Window Opened	August 15, 2024
Round 1 Window Closed	August 29, 2024
<b>Round 1 – All selection activities complete, and all preliminarily selected applicants notified</b>	<b>September 9, 2024</b>
Round 2 Window Opened	September 11, 2024
Round 2 Window Closed	September 25, 2024
<b>Round 2 – All selection activities complete, and all preliminarily selected applicants notified</b>	<b>October 4, 2024</b>
Direct Negotiation Window Opened	October 14, 2024
Direct Negotiation Window Closed	October 17, 2024
<b>Direct Negotiation – All selection activities complete, and all preliminarily selected applicants notified</b>	<b>October 30, 2024</b>
<b>Original Provisional Award Date – Coincides with Final Proposal draft released for public comment</b>	<b>November 18, 2024</b>
<b>NTIA BEAD Restructuring Policy Notice Released</b>	<b>June 6, 2025</b>
ULFW Provider Notice Posted on ConnectLA’s website	June 11, 2025
Rescission of Preliminarily Selection Letters Sent	June 13, 2025
ULFW Deadline for Providers to Notify ConnectLA of Intent to Submit Evidence	June 18, 2025
ULFW Deadline for Providers to Submit Evidence	June 25, 2025
Pre-qualification Window Re-Opened	June 25, 2025
Pre-qualification Window Closed	June 27, 2025
BOB Round Window Opened	July 1, 2025
BOB Round Window Closed	July 9, 2025
<b>BOB Round – All selection activities complete</b>	<b>August 4, 2025</b>
<b>BOB Provisional Award Date – Coincides with Final Proposal draft released for public comment</b>	<b>August 8, 2025</b>



## 1.2 Fair, Open, and Competitive Process

**Describe the steps that the Eligible Entity took to ensure a fair, open, and competitive process, including processes in place to ensure training, qualifications, and objectiveness of reviewers.**

**Fairness.** GUMBO 2.0 included 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 Louisiana law as applicable to GUMBO 2.0, applicants must fully disclose any real or apparent (perceived) COIs. In addition to these generally applicable Louisiana requirements, GUMBO 2.0 required attestation from prospective subgrantees including the acceptance of these terms. Such a conflict would arise when the “employee, any member of his or 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, ConnectLA also required state employees and consultants involved in the evaluation of subgrant applications to disclose any financial or other interest in any applicant entity and did not allow any employees with such interest to participate in the selection of GUMBO 2.0 subgrants. Other federal regulations with which the grantee must comply are the COI requirements in 2 CFR 200.112 and 24 CFR 570.489(h). Based on these disclosures, ConnectLA reserved the right to take any appropriate mitigation steps including, if necessary, the disqualification of the entity from GUMBO 2.0.

Second, Louisiana law prohibits direct collusion between bidders or applicants for state-provided funds; these rules directly apply to GUMBO 2.0. In addition, GUMBO 2.0 implemented 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 GUMBO 2.0 pre-qualification process, for example, prospective subgrantees must certify that they will refrain from making any public communication with respect to plans for applying for specific GUMBO 2.0 subgrants, until the announcement of final awards, using rules modeled after the Federal Communications Commission’s (FCC) prohibited communications rules for auctions. A number of Louisiana providers that participated in GUMBO 2.0 also participated in the FCC’s 2020 RDOF process and therefore are well-acquainted with these rules. In addition, all prospective subgrantees also will agree to adhere to the specific GUMBO 2.0 rule prohibiting any prospective subgrantee from publicly disclosing that it has received an award until after ConnectLA announces the end of GUMBO 2.0 after Round 2. This prohibition specifically applies to any prospective subgrantees confidentially notified of a Round 1 award, and failure to comply with this rule shall result in the disqualification of any remaining Round 2 applications. Prospective subgrantees were also required to follow these same rules for the BOB round.

ConnectLA emphasized transparency prior to the beginning of the subgrantee selection process. Only limited information was made available to prospective subgrantees with respect to competing applications’ proposed project areas, funding requests, technology types, or other selection criteria.



As a reinforcing element for these COI and anti-collusion protections, the detailed ownership disclosure requirements allowed ConnectLA 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.

GUMBO 2.0 guarded against bias or arbitrary outcomes via the use of transparent, objective criteria, both for the definition of SPAs as well as for scoring and selecting winning subgrantees. For example, the GUMBO 2.0 BOB scoring rubric is strongly weighted toward objective, quantitative metrics. Prior to opening of the BOB round, ConnectLA publicly posted Supplemental Notice V8.0 on its website. This Notice informed interested applicants of important updates aligned with the RPN.

**Openness.** GUMBO 2.0 welcomed the participation of any type of provider authorized to provide broadband service in Louisiana, including for-profit entities, co-operatives and public-private partnerships as enabled by the Local Government Fair Competition Act since 2004. The GUMBO 2.0 scoring rubric did not favor any particular provider nor type of provider.

In addition, GUMBO 2.0 provided public notice and transparency for all program activities up until applications were submitted, at which time only limited information was available in order to prevent indirect collusion by applicants, and then followed by full transparency after awards were announced. For example, all detailed GUMBO 2.0 application requirements and scoring rules were made public in advance of the application process.

**Competitiveness.** As mandated by the RPN, ConnectLA designed GUMBO 2.0 BOB to emphasize the competitiveness of subgrant awards and thereby deliver the most impact for the citizens of Louisiana from the state's BEAD allocation. First, as described above, almost all scoring elements were not only based on neutral criteria but are algorithmic in nature, including primary and secondary categories.

Above and beyond scoring rules, however, GUMBO 2.0's fundamental structure heightened competition for BEAD subgrants. As detailed above, BEAD 2.0 allowed ConnectLA to make objective comparisons between applications based on standardized project areas and objectively defined reference funding estimates.

To ensure that reviewers were adequately trained, qualified, and objective, ConnectLA implemented the following steps:

#### **1. Engaging External Reviewers for Specialized Support**

- a. Due to the small size of ConnectLA's staff (four positions, one of which remained unfilled until late October 2024), ConnectLA contracted external reviewers to assist with the subgrantee selection process.
- b. Contracted reviewers possessed extensive experience in program management and monitoring federally funded programs for other state agencies within Louisiana.
- c. The team comprised individuals with diverse expertise, including compliance, financial analysis, technical assessment, and operational management.



- d. ConnectLA assessed reviewers' qualifications and potential conflicts of interest by:
  - i. Evaluating resumes.
  - ii. Conducting background checks.
  - iii. Requiring completion of disclosure of interest forms and end-user agreements.

## 2. Expertise-Based Review Process

During the pre-qualification review, ConnectLA assigned specific questions to reviewers based on their expertise:

- a. **Financial capability questions** were reviewed by individuals with relevant financial experience.
- b. **Organizational capability questions** were reviewed by individuals experienced in organizational management.
- c. **Technical capability questions**, including network designs, speed and latency estimates, were evaluated by professionals with expertise in the internet and telecom industry and federal programs.
- d. **Legal and ownership-related questions**, including federal labor and employment laws and national laws, were reviewed by lawyers.
- e. **Risk management questions**, such as cybersecurity and supply chain risk management plans, were assessed by IT professionals knowledgeable about these requirements.

## 3. Final Review by ConnectLA Staff

- a. After the reviewers completed their assessments, ConnectLA staff conducted a final review of all questions.
- b. The staff then made determinations based on the reviewers' evaluations and recommendations.

These measures ensured that the review process was thorough, unbiased, and conducted by qualified professionals, thus maintaining the integrity of the subgrantee selection process.

# 1.3 Information on Applications

**Affirm that, when no application was initially received, the Eligible Entity followed a procedure consistent with the process approved in the Initial Proposal.**

ConnectLA hereby affirms that when no application was initially received, it followed a procedure consistent with the process approved in the Initial Proposal, as modified by the BEAD Restructuring Policy Notice. Additionally, ConnectLA affirms that when there were initially no applications to serve a location or group of locations that are unserved or underserved, it followed a procedure consistent with the process approved in the Initial Proposal and modified by the BEAD Restructuring Policy Notice.

As described in Section 1.1 above, after finalizing all preliminary selections of submitted BOB round applications, a total of 1,044 "orphan BSLs" remained. Per IPv2 Section 2.4.7, ConnectLA "reserves the right to administer additional competitive grant rounds in order to achieve the goals of BEAD and



ensure 100% of all BSLs in the State.” Based on this, ConnectLA launched a “Direct Negotiation” process as described above in section 1.1.

## 1.4 Revision of Eligible CAI List

**If applicable, describe the Eligible Entity’s methodology for revising its eligible CAI list to conform with Section 4 of the BEAD Restructuring Policy Notice.**

Not applicable. Louisiana made no adjustments to the statutory definition of a CAI.

## 1.5 Subgrantee Record Retention

**Certify that the Eligible Entity will retain all subgrantee records in accordance with 2 C.F.R. § 200.334 at all times, including retaining subgrantee records for a period of at least 3 years from the date of submission of the subgrant’s final expenditure report. This should include all subgrantee network designs, diagrams, project costs, build-out timelines and milestones for project implementation, and capital investment schedules submitted as a part of the application process.**

ConnectLA certifies that our office will retain all subgrantee records in accordance with 2 C.F.R. § 200.334 at all times, including retaining subgrantee records for a period of at least three (3) years from the date of submission of the subgrant’s final expenditure report. These records will include all subgrantee network designs, diagrams, project costs, build-out timelines and milestones for project implementation, and capital investment schedules submitted as a part of the application process.



## Section 3 Timeline for Implementation (Requirement 3)

### 3.1 Deployment Projects and Activities

Has the Eligible Entity taken measures to: (a) ensure that each subgrantee will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant; (b) ensure that all BEAD subgrant activities are completed at least 120 days prior to the end of the Eligible Entity’s period of performance, in accordance with 2 C.F.R. 200.344; and (c) ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by the end of the period of performance for its award, in accordance with 2 C.F.R. 200.344.

ConnectLA hereby affirms that it will ensure that each BEAD subgrantee will begin to provide services to customers that desire broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant. Additionally, ConnectLA required all prospective subgrantees to certify that their construction timeline, from subgrant agreement execution to construction completion and initiation of broadband service, can be completed within four (4) years. ConnectLA will establish interim buildout milestones in each subgrant agreement, enforceable as conditions of the subgrant, to ensure subgrantees are making reasonable progress toward meeting the four (4) year deployment deadline. GUMBO 2.0 awards will be made on a fixed amount subgrant with a period of performance of four (4) years beginning on the grant date and based on the payment milestone table below:

MILESTONE	DISBURSEMENT (PERCENT OF AWARD)	MAXIMUM CUMULATIVE DISBURSEMENT (PERCENT OF AWARD)
Office approval of detailed project budget and schedule as an addendum to the executed subgrant agreement(s)	10%	10%
<b>Subgrantee certification and Office completion of a technical and compliance audit that the Subgrantee has reached:</b>		
10% of Project BSLs	10%	20%
35% of Project BSLs	15%	35%
60% of Project BSLs	25%	60%
85% of Project BSLs	25%	85%
100% of Project BSLs and the Office’s approval of Subgrantee’s Completion Report	15%	100%



ConnectLA will only disburse funds for completed deployment activities that comply with the terms included in the subgrant agreement and will withhold funds for failure to do so. GUMBO 2.0 will also include clear penalties in the subgrant agreement for non-performance, failure to meet statutory obligations, or wasteful, fraudulent, or abusive expenditure of grant funds. Such penalties include, but are not limited to, imposition of additional award conditions, payment suspension, award suspension, grant termination, de-obligation of funds, clawback provisions (i.e., provision allowing recoupment of funds previously disbursed), and debarment of organizations and/or personnel.

ConnectLA hereby affirms that it will prepare a closeout agreement and submit it to all subgrantees for execution and ensure that all BEAD-funded subgrant activities are completed at least 120 days prior to the end of ConnectLA's period of performance, in accordance with 2 C.F.R. 200.344; and ensure that all programmatic BEAD grant activities undertaken by ConnectLA are completed by the end of its own period of performance, in accordance with 2 C.F.R. 200.344.

ConnectLA hereby affirms that it will ensure subgrantees that made specific commitments in response to the "speed to deployment" scoring criteria meet the timelines stated in their applications. ConnectLA will implement a robust subgrantee reporting and monitoring plan as outlined in Section 4. Monitoring plans will be delivered to the subgrantees during a Subgrantee Monitoring Kickoff Meeting and the ConnectLA Compliance Team will oversee the monitoring. Monitoring will include frequent communication between the compliance team and the subgrantee with the goal of ensuring a compliant and successful collaboration. Monitoring activities will include both desk reviews of documentation submitted by subgrantees and on-site review of deployment activities. Monitoring will focus on both administrative and financial compliance and on the programmatic requirements relating to Network Capabilities, Deployment Requirements, and Service Obligations. Additionally, ConnectLA will provide subgrantees with training and technical assistance on program related matters. Documentation of communication will be captured. Any delinquencies in project requirements will be documented and may result in corrective action being issued to the subgrantee along with further reporting and status reporting requirements.

ConnectLA hereby affirms that it will ensure each subgrantee reaches key milestones in their submitted proposals/documentation by submitting a monthly report to ConnectLA for each funded project, for the duration of the agreement. At a minimum, the report will include:

- Miles of Project network constructed;
- Milestone/status of each location for that month;
- End Users that obtained access to broadband service during the reporting period;
- Award Funds expended, reported in a manner consistent with the requirements in the subgrant agreement;
- All instances of known damage to existing underground utilities that occur during the construction or installation of broadband infrastructure funded by GUMBO 2.0, in a manner and form specified by ConnectLA.

Information and documentation related to the requirements above will be collected and reviewed by qualified personnel. ConnectLA will utilize a reporting and compliance portal to capture, organize, and



manage all reports. All required documentation will be stored in accordance with record retention requirements.

ConnectLA hereby affirms that it will ensure the completion of all BEAD activities within the mandated timeframes, including ConnectLA's requirements for subgrantee reporting and accountability.



## Section 4 Oversight and Accountability Processes (Requirement 4)

### 4.1 Waste, Fraud, and Abuse Hotline

Does the Eligible Entity have a public waste, fraud, and abuse hotline, and a plan to publicize the contact information for this hotline?

If individuals need to report waste, fraud, or abuse, they can email ConnectLA directly at [connect@la.gov](mailto:connect@la.gov). There is also a statewide oversight agency in Louisiana where concerns can be reported.

- Louisiana Legislative Auditor [Fraud Hotline](#)

At the time of its Final Proposal submission, ConnectLA's website included a 'Report Fraud' button in the bottom right corner, linking to the Louisiana Legislative Auditor's website where individuals can report fraud.

### 4.2 BEAD Monitoring Plan and Policies

Upload the following two required documents:

(1) BEAD program monitoring plan;

(2) Agency policy documentation which includes the following practices:

- 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) or on a basis determined by the terms and conditions of a fixed amount subaward agreement; and
- b. Timely subgrantee (to Eligible Entity) reporting mandates.

See **Exhibit F** – BEAD Program Monitoring Plan.

See **Exhibit G** – Draft Subgrant Agreement (All elements of required agency policy documentation are included in the Draft Subgrant Agreement.)

### 4.3 Certification for Subgrant Agreements

Certify that the subgrant agreements will include, at a minimum, the following conditions:

- a. Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including



- at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;
- b. Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;**
  - c. Compliance with all relevant obligations in the Eligible Entity's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the Eligible Entity's BEAD award;**
  - d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;**
  - e. Subgrantee accountability practices that include the use of clawback provisions between the Eligible Entity and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);**
  - f. Mandate for subgrantees to publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) and/or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud, or abuse in the Program. This includes an acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer; and**
  - g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance is consistently assessed and tracked over time.**

ConnectLA certifies that the subgrantee agreements will include, at a minimum, the following conditions:

- a. Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;
- b. Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;
- c. Compliance with all relevant obligations in the ConnectLA's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the ConnectLA's BEAD award;
- d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;
- e. Subgrantee accountability practices that include the use of clawback provisions between the ConnectLA and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);
- f. Mandate for subgrantees to publicize telephone numbers and email addresses for ConnectLA's Office point of contact and Office of Inspector General, and/or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud, or abuse in the Program. This includes an acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer; and
- g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance is consistently assessed and tracked over time.



ConnectLA has communicated the requirements stipulated above to all prospective subgrantees prior to the selection process. This has been completed by conducting outreach efforts to participating stakeholders (webinars, in-person meetings, etc.), posting a list of regulations on the ConnectLA website, and including the requirements in grant application instructions and grant agreement terms, conditions, and monitoring program requirements. Additionally, ConnectLA publicly posted a draft template of its broadband deployment subgrant agreement on their [website](#) for transparency purposes, demonstrating that all required components, including alignment to the BEAD Restructuring Policy Notice, are included. See **Exhibit G** for Draft Subgrant Agreement.



## Section 5 Local Coordination (Requirement 5)

### 5.1 Public Comment Period on Final Proposal

Describe the public comment period and provide a high-level summary of the comments received by the Eligible Entity during the public comment period, including how the Eligible Entity addressed the comments.

#### *Public Comment Period on Final Proposal*

As required by NTIA, the public comment period for Louisiana’s Final Proposal lasted no less than 7 days. The public comment period commenced on August 8, 2025, and lasted through August 15, 2025. All stakeholders, including political subdivisions, were afforded an opportunity to submit comments via ConnectLA’s website during this period. Comments were submitted via ConnectLA’s website.

#### *Summary of Comments Received & Incorporation of Feedback into Final Proposal*

Public comments included the following:

- Six comments expressed strong satisfaction with an Internet Service Provider’s service, praising its speed compared to previous internet options, its expansion into rural and underserved areas of Louisiana, and recommend the company to others.
- Recommendation that Louisiana reserve \$44M of remaining BEAD funds, if any, for a multi-dwelling unit (MDU) capital improvement program—modeled on South Carolina’s—to upgrade wiring in affordable and public housing. This could connect 44,000 residents (about two-thirds currently lack high-speed internet), supporting education, employment, telehealth, and other essential services.
- Praised ConnectLA’s technology-neutral BEAD plan and urges Louisiana to invest its remaining \$856 million in non-deployment activities, such as the CASH program, workforce development via LCTCS, and smart agriculture. They emphasize Louisiana’s authority and funding to implement these initiatives and encourage notifying NTIA of the intent to use the full BEAD allocation.
- Opposed selecting SpaceX/Starlink as a subgrantee, citing concerns that its service often fails to meet the required 100/20 Mbps broadband speeds, has limited network capacity, does not create local infrastructure or jobs, and poses higher long-term costs compared to fiber broadband.
- Expressed frustration with the BEAD funding maps, noting that much of Bienville Parish is slated for satellite service rather than fiber. Argument that BEAD funds should support local companies to bring affordable high-speed fiber to underserved areas. Expressed concern that satellite, particularly Starlink, is expensive and not a true solution. Urged a rebidding process with clear rules, transparency on bids, and negotiations with fiber providers to prioritize fiber deployment over satellite in areas previously slated for fiber.
- Eleven comments strongly opposed awarding broadband funding to Starlink for Lake Providence, LA, arguing that satellite internet is unreliable, costly, weather-dependent, and



unsuitable for businesses, schools, or densely populated areas. They stressed that fiber is the future of broadband and that a local Internet Service Provider has already built fiber lines to the edge of town, making it more efficient to complete that network. The commenters called satellite service a waste of taxpayer money, citing personal experiences of poor speeds and reliability during visits. They urge investment in fiber to modernize the town's outdated internet and support economic growth, education, and residents' needs.

- Sixteen commenters who are residents of East Carroll Parish overwhelmingly oppose awarding broadband grant funds to Starlink, calling the decision unfair, wasteful, and inefficient compared to funding fiber networks. They argue that 80% of eligible locations in Louisiana are receiving fiber, yet East Carroll and some nearby parishes are being given Starlink, despite fiber already being built to the edge of Lake Providence by a local Internet Service Provider.
  - Key concerns include:
    - Technical limitations: Starlink speeds and reliability degrade as more users connect, making it unsuitable for the parish's dense population centers, schools, hospitals, and businesses.
    - Scalability: Grant rules require easily scalable speeds, but Starlink can only increase capacity by launching more satellites, unlike fiber which can be upgraded by extending lines.
    - Affordability: Starlink is expensive, with potential data overage charges, and residents say many can't afford it.
    - Economic impact: Satellite service won't attract businesses or create local jobs, whereas fiber could.
    - Environment and geography: The area's dense tree cover further limits Starlink's performance.
  - They emphasize that completing the existing fiber network would be the most efficient use of taxpayer money and vow to "fight for fiber" rather than settle for satellite.
- Three Internet Service Providers requested awarded locations they already serve be removed from eligible areas (Reason Code 5). Three applicants questioned the results of ConnectLA's Benefit of the Bargain round. These comments did not impact the contents of the Final Proposal submission.

ConnectLA takes all comments seriously and is committed to ensuring compliance with federal guidelines through ongoing monitoring as the BEAD program progresses. After receiving feedback, ConnectLA thoroughly analyzed the comments and concluded that no significant changes to the Final Proposal were necessary. However, ConnectLA will keep these comments in mind as the program continues to evolve.



## Section 6 Challenge Process Results (Requirement 6)

### 6.1 Successful Completion and Approval of Challenge Process

**Certify that the Eligible Entity has successfully completed the BEAD Challenge Process and received approval of the results from NTIA.**

ConnectLA certifies that it successfully completed the BEAD Challenge Process on January 6, 2024, and received approval of the results from NTIA on July 1, 2024.

### 6.2 Challenge Process Results

**Provide a link to the website where the Eligible Entity has publicly posted the final location classifications (unserved/underserved/CAIs) and note the date that it was publicly posted.**

Following approval of the Challenge Process by NTIA and the required public comment period, ConnectLA publicly posted the final location classifications on their [website](#) on July 1, 2024.



## Section 7 Unserved and Underserved Locations (Requirement 7)

### 7.1 Certification of Broadband Service Coverage of Unserved Locations

**Certify whether the Eligible Entity will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2).**

Yes. ConnectLA certifies that it will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified by ConnectLA's NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2). ConnectLA certifies that there is, for every unserved location, either a BEAD project or an appropriate reason code for not serving a location through a BEAD project.

### 7.2 Coverage of Unserved Locations Determination

**If the Eligible Entity does not serve an unserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.**

Not applicable.

### 7.3 Coverage of Unserved Locations Documentation

**If applicable to support the Eligible Entity's response to Question 7.2, provide relevant files supporting the Eligible Entity's determination.**

Not applicable.

### 7.4 Certification of Broadband Service Coverage of Underserved Locations

**Certify whether the Eligible Entity will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2).**

Yes. ConnectLA certifies that it will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified by ConnectLA's NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2). ConnectLA certifies that there is, for every underserved



location, either a BEAD project or an appropriate reason code for not serving a location through a BEAD project.

## 7.5 Coverage of Underserved Locations Determination

If the Eligible Entity does not serve an underserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.

Not applicable.

## 7.6 Coverage of Underserved Locations Documentation

If applicable to support the Eligible Entity's response to Question 7.5, provide relevant files supporting the Eligible Entity's determination.

Not applicable.

## 7.7 Certification of Documentation of Unserved or Underserved Locations

**Certify that the Eligible Entity has utilized the provided reason codes to investigate and account for locations that do not require BEAD funding, that the Eligible Entity will utilize reason codes 1, 2, and 3 for the entire period of performance, and that the Eligible Entity will maintain documentation, following the guidelines provided by NTIA, to justify its determination if there is a reason to not serve any unserved or underserved location on the NTIA-approved Challenge Process list through a BEAD project. The documentation for each location must be relevant for the specific reason indicated by the Eligible Entity in the *fp\_no\_BEAD\_locations.csv* file. The Eligible Entity shall provide the documentation for any such location for NTIA review, as requested during Final Proposal review or after the Final Proposal has been approved.**

Yes. ConnectLA certifies that it has utilized the provided reason codes to investigate and account for locations that do not require BEAD funding, that ConnectLA will utilize the reason codes 1, 2, and 3 for the entire period of performance, and that ConnectLA will maintain documentation, following the guidelines provided by NTIA, to justify its determination that there is a reason to not serve any unserved or underserved location on the NTIA-approved Challenge Process list through a BEAD project.

Unserved and underserved locations that will not be served through a BEAD project are noted in the *fp\_no\_BEAD\_locations.csv* file, **Exhibit D**.



## 7.8 Certification of Coverage of Underserved Locations

**Certify the Eligible Entity has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that the Eligible Entity was notified of and did not object to, and/or federally-funded awards for which the Eligible Entity has discretion over where they are spent (e.g., regional commission funding or Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects.**

Yes. ConnectLA certifies that it has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that ConnectLA was notified of and did not object to, and/or federally funded awards for which ConnectLA has discretion over where they are spent, in its list of proposed projects.



# Section 11 Cost and Barrier Reduction, Compliance with Labor Laws, Low-Cost Plans, and Network Reliability and Resilience (Requirement 11)

## 11.1 Reducing Costs and Barriers to Deployment

**Provide the implementation status (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment.**

ConnectLA's implementation plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment are in progress.

Since NTIA's approval of Louisiana's Initial Proposal Volume II (IPv2), ConnectLA has made the following progress on plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment:

### **Streamlining permitting processes;**

In July 2024, Governor Jeff Landry signed ACT 632<sup>3</sup> into law with the following provisions related to broadband providers and municipalities.

*Coordination of broadband providers with parishes and municipalities:*

1. Broadband providers (applicants) receiving funding through the GUMBO 2.0 Program shall provide a 30-day advanced written notice before the commencement of GUMBO 2.0 construction activities to the relevant parish or municipality. Nothing in this Section relieves the GUMBO 2.0 grantee of its obligations to comply with local regulations and ordinances.

*The relevant local government subdivision may do either of the following:*

1. Require a one-time GUMBO 2.0 grant assessment for the construction and installation of GUMBO 2.0 grant-funded broadband facilities and may charge a corresponding one-time GUMBO 2.0 grant assessment fee not to exceed \$1,000.
2. Require a permit for construction and installation of GUMBO 2.0 grant-funded broadband facilities and may charge a corresponding one-time permit fee not to exceed \$1,000.

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<sup>3</sup> <https://legis.la.gov/legis/ViewDocument.aspx?d=1382361>



To ensure municipalities understand the provisions of ACT 632 regarding permitting, ConnectLA sent letters to all 64 parish presidents in Louisiana.

## 11.2 Compliance with Federal Labor and Employment Laws

**Affirm that the Eligible Entity required subgrantees to certify compliance with existing federal labor and employment laws.**

ConnectLA hereby affirms that subgrantees were required to certify compliance with existing federal labor and employment laws.

## 11.3 Compliance with Federal Labor and Employment Laws

**If the Eligible Entity does not affirm that subgrantees were required to certify compliance with federal labor and employment laws, explain why the Eligible Entity was unable to do so.**

Not applicable.

## 11.4 Certification of Low-Cost Broadband Service Option

**Certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.**

Yes. ConnectLA certifies that all subgrantees selected will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.<sup>4</sup>

## 11.5 Low-Cost Broadband Service Option

**If the Eligible Entity does not certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period, explain why the Eligible Entity was unable to do so.**

Not applicable.

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<sup>4</sup> The federal interest period for BEAD-funded broadband infrastructure projects is ten years after the year in which the relevant subgrant has been closed out in accordance with 2 C.F.R. § 200.334.



## **11.6 Certification of Reliability and Resilience of BEAD-funded Networks**

**Certify that all subgrantees have planned for the reliability and resilience of BEAD-funded networks.**

Yes. ConnectLA certifies that it focused on ensuring the reliability and resilience of BEAD-funded broadband infrastructure when selecting subgrantees.

## **11.7 Reliability and Resilience of BEAD-funded Networks**

**If the Eligible Entity does not certify that subgrantees have ensured planned for the reliability and resilience of BEAD-funded networks in their network designs, explain why the Eligible Entity was unable to do so.**

Not applicable.



# Section 12 Substantiation of Priority Broadband Projects (Requirement 12)

## 12.1 Deployment of Priority Broadband Projects

**Describe how the Eligible Entity applied the definition of Priority Project as defined in the Infrastructure Act and the BEAD Restructuring Policy Notice.**

IIJA requires Eligible Entities to prioritize funding for “priority broadband projects.” The term “priority broadband project” (PBP) means a project designed to:

- “a project that provides broadband service at speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads, has a latency less than or equal to 100 milliseconds, and can easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services.”

### ***A. Guidance to Applicants***

ConnectLA directed applicants that wished to request that an application be treated as a PBP to select 'Yes' in the portal when prompted. Applicants were required to provide supporting documentation sufficient for ConnectLA to assess the network application and determine that the proposed network architecture for each specific project area meets this standard. Applicants were required to provide, at a minimum, supporting documentation that includes:

- A statement of whether the project as designed can, in the relevant project:
  - Be easily scaled to support symmetrical upload and download speeds of 1 Gbps, 5 Gbps, and/or 10Gbps<sup>5</sup>;
  - Whether such scaling can be easily achieved by (a) the end of the project’s period of performance, or (b) 10 years after the year in which the subgrant for a project has been closed out pursuant to 2 CFR 200.344;
  - Provide an explanation of the project’s capacity to deliver those speeds to all BSLs in the project area, working from the assumption that a network capable of providing 100 Mbps downstream capacity requires at least 5 Mbps of simultaneous downstream capacity for each BSL in the project area;
  - Account for the cost of any software or hardware upgrades required to obtain those speeds and whether those costs are accounted for in the applicant’s pro formas;
  - Specify the amount of time required to conduct such upgrades;

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<sup>5</sup> For the sake of clarity, ConnectLA did not use the speed thresholds set forth in this element as performance requirements in its PBP determinations. The thresholds were provided only to elicit fulsome information from applicants regarding the expected capabilities of their proposed networks over time.



- Explain whether the project can or will be able to provide dedicated backhaul for 5G services, and on what time; and
- Provide a demonstration and narrative that this scaling is easy to achieve, in the form of time to deploy with the relative expense compared to the initial deployment.
- Evidence of the network's ability to easily support emerging real-time applications ( $\leq 20\text{ms}$ ) and high-precision applications ( $\leq 50\text{ms}$ ), to include AR, AI and IOT applications.
- For projects that rely on wireless spectrum (i.e., fixed wireless and low earth orbit satellite)
  - Identification of the specific spectrum bands to be utilized in the project, including the minimum and maximum radio frequency bandwidth, and the spectral efficiency of the network.
  - Details of the network capabilities including maximum capacity of each base station, simultaneous capacity to all BSLs, reserved base station capacity and capacity expansion strategies, and adherence to equipment manufacturer best practices.
  - Maximum distance to served locations for each tower or radio location, and an explanation of the propagation analysis utilized to determine the applicant's ability to serve the BSLs included in the project.
  - Details on the backhaul that will be utilized from each tower, radio location, or gateway.

To assist with this determination, all applicants seeking Priority status were required to provide a Professional Engineer certification attesting to the accuracy of the scalability claims made in the application.

## ***B. Identifying Applications In Need of PBP Review***

ConnectLA scored and ranked all applications for the same general project area for which PBP status was sought prior to evaluating the evidence filed in support of the PBP claim. ConnectLA then eliminated from consideration any application that requested more than \$8,000 in grant per eligible location as excessively high cost. ConnectLA then evaluated the sufficiency of the PBP claim for the highest scoring application using the methodology described below. If ConnectLA determined that the highest scoring application carried the burden, based on the specific characteristics of the project area in question, of (a) demonstrating that it met the required speed and latency standards set forth in the statute and the NOFO and (b) demonstrating that it met the additional statutory criteria, including that the project can easily scale speeds over time to support evolving connectivity needs and the deployment of 5G and successor wireless technologies, ConnectLA designated the application for preliminary award. If ConnectLA determined that the highest scoring application did not carry the burden described above, ConnectLA designated the application as a non-priority broadband project, placed the application in queue for later consideration if appropriate, and moved on to evaluating the PBP claim of the next highest scoring application.

## ***C. Methodology***

### *i. Initial Sufficiency Screen*



ConnectLA first conducted an initial screen focused on determining whether the applicant provided information sufficient for ConnectLA to evaluate the applicants PBP claim. Specifically, ConnectLA verified that the application included a certification from a professional engineer attesting to the accuracy of the PBP claims, identified the specific technologies proposed for use (e.g., XGS-PON or XG-PON rather than “fiber”), provided performance information specific to the project rather than simply a general statement of capability (e.g., an application proposing an XGS-PON network identifies specific split ratios and oversubscription ratios for the project or simply states that XGS-PON is capable of delivering 10 Gbps symmetrical), and appeared to address each of the bullets set forth in the guidance to applicants described above.

This initial sufficiency screen was not a “pass/fail” exercise but instead was used to inform ConnectLA’s overall assessment of each application’s PBP claims.

*ii. Detailed Review*

Following the sufficiency screen, ConnectLA had contract technical reviewers complete a Priority Broadband Project Technical Reviewer Checklist. The checklist required reviewers to determine whether the application addressed each of the elements specified in ConnectLA’s guidance and to provide notes on how the evidence presented supported the application’s PBP claim.

The checklist also required technical reviewers to determine whether applications that rely on spectrum assets (e.g., fixed wireless and LEO) fall partially or entirely within geographic areas that ConnectLA’s analysis demonstrate LEO or fixed wireless providers will not be able to scale into the future due to a combination of limitations on available spectrum, the impact of tree canopy on service availability, high customer density and potential demand, the impact of 5G and/or other wireless backhaul on residential end-user capacity, and the presence or absence of vertical assets and enterprise locations.

The results of these reviews were forwarded to ConnectLA staff for final assessment and determination.

*iii. Determination*

ConnectLA staff made their determination of whether an application carried the burden of demonstrating that it meets the statutory criteria for a priority broadband project based on the totality of the circumstances, taking into consideration the information provided by the applicants, ConnectLA’s in-depth understanding of the local characteristics of the project areas throughout the state, the detailed technical reviews (and, where appropriate, clarification and additional information from technical reviewers and/or subject matter experts), and ConnectLA’s independent knowledge and assessment of the project areas and the characteristics of various broadband technologies, placing more weight on information specific to the project area than generalized information about the current and claimed performance abilities of technology categories overall or of the general long- term plans of given applicants.



In making its determinations, no one factor was dispositive. For example, applications for LEO and fixed wireless projects did not generally claim the ability to deliver 10Gbps speeds within the 10-year federal interest period, but otherwise demonstrated their ability to “easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services” through their technical capabilities and due to the characteristics of the specific project areas in question.

Priority Broadband Projects are noted in the *fp\_deployment\_projects.csv* file, **Exhibit B**.



## Section 13 Subgrantee Selection Certification (Requirement 13)

### 13.1 Subgrantee Scoring Criteria

**Provide a narrative summary of how the Eligible Entity applied the BEAD Restructuring Policy Notice's scoring criteria to each competitive project application and describe the weight assigned to each Secondary Criteria by the Eligible Entity. Scoring criteria must be applied consistent with the prioritization framework laid out in Section 3.4 of the BEAD Restructuring Policy Notice.**

The following evaluation criteria supersede all prior ConnectLA BEAD criteria and were utilized to analyze competing Priority Broadband Project applications and, if no Priority Broadband Project was submitted for consideration for that respective project area or location or if the cost of the project is excessive, competing non-Priority Broadband Project applications.

Per the BEAD Restructuring Policy Notice, ConnectLA hereby adopts the following subgrantee selection criteria:

#### **Primary Criteria:**

In deciding among competing applications covering the same general project area, ConnectLA chose the option with the lowest cost based on minimal BEAD Program outlay.

ConnectLA selected the combination of project proposals with the lowest overall cost to the Program. When comparing competing proposals, ConnectLA assessed total BEAD funding required to complete the project and the cost to the Program per location.

#### **Secondary Criteria:**

If an application to serve the same general project area proposed a project cost within 15% of the lowest-cost proposal received for that same general project area on a per BSL basis, ConnectLA evaluated such competing applications based on the following three criteria:

##### 1. Preliminary Subgrantees

- For locations where ConnectLA has already identified preliminarily selected subgrantees, ConnectLA selected those applications in the BOB process.
- If no applicant for locations was previously preliminarily selected, ConnectLA evaluated the second criterion.



## 2. Speed of Network and Other Technical Capabilities

- ConnectLA evaluated the speed, latency, and other technical capabilities of the technologies proposed by prospective subgrantees and selected the application with the highest technical capabilities.
- If all applications have equal capabilities, ConnectLA evaluated the third criterion.

## 3. Speed of Deployment

- ConnectLA evaluated the prospective subgrantee's binding commitment to provide service by a date certain that is earlier than four years after the date on which the subgrantee will receive the subgrant from ConnectLA subject to contractual penalties and will select the application with the fastest speed to deployment.
- If all applications have equal deployment timelines, ConnectLA selected the lowest-cost proposal received for that same general project area.

ConnectLA prioritized Priority Broadband Projects over non-Priority Broadband Projects. If ConnectLA determined that selecting any Priority Broadband Project would incur excessive costs, it selected a lower cost non-Priority Broadband Project. Additionally, if ConnectLA determined that no proposal meets the definition of a Priority Broadband Project, then it selected a non-priority broadband project that meets the speed and latency requirements of the statute and NOFO.



## Section 14 Environmental and Historic Preservation (EHP) Documentation (Requirement 14)

### 14.1 Environmental and Historic Preservation (EHP) Documentation

Submit a document which includes the following:

- Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's National Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.
- Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.
- Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/regional-programmatic-environmental-impact-statements>.
- Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.
- Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

See Exhibit H.



## Section 15 Consent from Tribal Entities (Requirement 15)

### 15.1 Documentation of Consent from Tribal Entities

Upload a Resolution of Consent from each Tribal Government (in PDF format) from which consent was obtained to deploy broadband on its Tribal Land. The Resolution(s) of Consent submitted by the Eligible Entity should include appropriate signatories and relevant context on the planned (f)(1) broadband deployment including the timeframe of the agreement. The Eligible Entity must include the name of the Resolution of Consent PDF in the Deployment Projects CSV file.

See Resolution(s) of Consent from each of the following Tribal Governments at **Exhibit I**:

1. Jena Band of Choctaw Indians
2. Tunica-Biloxi Tribe of Louisiana
3. The Chitimacha Tribe of Louisiana
4. Coushatta Tribe of Louisiana



## Section 16 Prohibition on Excluding Provider Types (Requirement 16)

### 16.1 Certification of Exclusion of Provider Types

**Does the Eligible Entity certify that it did not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for a BEAD subgrant, consistent with the requirement at 47 U.S.C. § 1702(h)(1)(A)(iii)?**

Yes. ConnectLA hereby certifies that it did not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for a BEAD subgrant, consistent with the requirement at 47 U.S.C. § 1702(h)(1)(A)(iii).



## Section 17 Waivers

### 17.1 Waivers for BEAD Requirements

If any waivers are in process and/or approved as part of the BEAD Initial Proposal or at any point prior to the submission of the Final Proposal, list the applicable requirement(s) addressed by the waiver(s) and date(s) of submission. Changes to conform to the BEAD Restructuring Policy Notice should be excluded. If not applicable to the Eligible Entity, note 'Not applicable.'

Not applicable.

### 17.2 Waivers for BEAD Requirements

If not already submitted to NTIA, and the Eligible Entity needs to request a waiver for a BEAD program requirement, upload a completed Waiver Request Form here. If documentation is already in process or has been approved by NTIA, the Eligible Entity does NOT have to upload waiver documentation again.

Not applicable.



## **Section 18 Exhibits**

**Exhibit A – Subgrantees CSV file**

**Exhibit B – Deployment Projects CSV file**

**Exhibit C – Locations CSV file**

**Exhibit D – No BEAD Locations CSV file**

**Exhibit E – CAIs CSV file**

**Exhibit F – BEAD Program Monitoring Plan**

**Exhibit G – Draft Subgrant Agreement**

**Exhibit H – Environmental and Historic Preservation (EHP) Documentation**

**Exhibit I – Documentation of Consent from Tribal Entities**



**ConnectLA**