California Public Utilities Commission Broadband Equity, Access, and Deployment Program (BEAD)

Subgrantee Selection Process Frequently Asked Questions

July 22, 2025
BEAD 2.0 Version 2

The California Public Utilities Commission (CPUC) is committed to ensuring a fair, open, and competitive Subgrantee Selection Process for the Broadband Equity, Access, and Deployment (BEAD) program. To promote transparency and provide equal access to information, the CPUC has developed this Frequently Asked Questions (FAQ) to address inquiries from potential applicants and stakeholders.

The CPUC requests that all questions regarding the BEAD Subgrantee Selection Process be submitted in writing to BEADgrant@cpuc.ca.gov. All questions received will be answered in writing.

This FAQ consolidates questions received through BEAD outreach channels, and along with the CPUC's responses, ensures all interested parties have access to this information. This document is intended to complement and clarify the information outlined in the BEAD Grant Application materials, California's approved Initial Proposal Volume II (IPv2), National Telecommunications and Information Administration (NTIA) Notice of Funding Opportunity (NOFO), Decision Approving Volume Two of the Broadband Equity, Access, and Deployment Program Rules and Proposed Decision Modifying Decisions 24-05-029 and 24-09-050. **It does not alter or override** the provisions of the approved IPv2, NOFO, Decision Approving Volume Two of the Broadband Equity, Access, and Deployment Program Rules, or Proposed Decision Modifying Decisions 24-05-029 and 24-09-050**.** If there are discrepancies between answers in this document and responses given through BEAD outreach channels, **the answers in this document should be considered the official reference**.

The CPUC will continue to update this FAQ throughout the Subgrantee Selection Process to address additional questions as they arise, ensuring clarity and transparency through the BEAD program rollout.

Note: On June 6, 2025, the NTIA issued a public notice requiring states to revise their BEAD subgrantee selection process. In response, California is reopening a new round of applications and has revised its Prequalification Application and Project Application to comply with the NTIA's BEAD Restructuring Policy Notice for BEAD 2.0. In BEAD 2.0 Version 1, certain questions were updated or removed to reflect program changes resulting from the BEAD Restructuring Policy Notice. This version, along with all subsequent versions of the CPUC BEAD 2.0 FAQ, will supersede all previous versions.

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Program Overview and Key Definitions

#	Questions	Answers	Date/Version
1.	Could you provide an overview of the BEAD program?	A comprehensive overview of the Subgrantee Selection Process can be found in the CPUC's Initial Proposal volume 2 (IPv2), available for download on the CPUC BEAD Program website. The CPUC hosted a webinar on BEAD Subgrantee Selection Process on December 3, 2024, and an additional webinar was hosted on July 11, 2025, on the recent updates to the program. The presentation materials are available here, and the webinar recording can be accessed here. Please be advised that BEAD Program elements have been modified by NTIA, these modifications are outlined in the BEAD Restructuring Policy Notice. Some examples of modifications are as follows: • Removal or adjustment of BEAD regulatory requirements • Establishment of technology neutrality • Removal or adjustment of BEAD scoring criteria • Modification of Initial and Final Proposal requirements Further guidance on the BEAD modifications are found in the NTIA BEAD FAQ and the NTIA BEAD website. The CPUC provides Subgrantee Selection Process training and technical support, which can be found on the CPUC BEAD Program website. The CPUC has posted the BEAD 2.0 application materials, which can also be found on the CPUC BEAD webpage.	July 17, 2025/BEAD 2.0 V.1 Updated July 22, 2025
2.	Is the NOFO the same as the Decision document?	The National Telecommunications and Information Administration (NTIA) Notice of Funding Opportunity (NOFO) lays out the rules that all states must follow for awarding grants under the BEAD program, while the Decision outlines the specific program design and implementation steps unique to the state. The latest CPUC Proposed Decision Modifying Decisions 24-05-029 and 24-09-050 can be found on the CPUC website. Please be advised that the NTIA BEAD Restructuring Policy Notice (RPN) has modified BEAD program elements. Please refer to the RPN for more details.	July 17, 2025/BEAD 2.0 V.1
3.	Where can I find the NTIA-approved version of CA BEAD Volume II? Is the application guide available yet? If so, where can I find it?	The CPUC's Initial Proposal volume 2 (IPv2) is available for download on the CPUC BEAD Program website. Please check the CPUC BEAD Program website regularly for updates. Additional resources are also available at the CPUC BEAD Resources webpage.	July 17, 2025/BEAD 2.0 V.1

		Please note that the NTIA BEAD Restructuring Policy Notice (RPN) replaces some elements of the IPv2; where relevant, please refer to the NTIA Restructuring Policy Notice, published Application Guides and application templates, and the webinar hosted on July 11, 2025 for final program details. The presentation materials are available here, and the webinar recording can be accessed here. For BEAD programmatic elements within the CPUC IPv2 and BEAD NOFO that were not affected by the RPN, they shall remain substantive programmatic elements as mandated by NTIA	
4.	Can the CPUC allocate its BEAD funding solely to deploy fiber to unserved areas, or is it required to use the funding to serve both unserved and underserved populations using any feasible technology?	BEAD Program funds can be used for both unserved and underserved locations. All applicants will be required to submit a proposal to serve both unserved and underserved locations using the technology of the applicant's choice. Consistent with the NOFO and the NTIA Restructuring Policy Notice (RPN), the CPUC will prioritize Priority Broadband Projects in its selection process. Please be advised that the NTIA Restructuring Policy Notice has modified BEAD program elements such as the definition of "Priority Broadband Project." Please refer to the RPN for more details.	July 17, 2025/BEAD 2.0 V.1
5.	Does the State of California expect to have two rounds of BEAD application submissions, with fiber as the first round and hybrid as the second round?	Per the NTIA BEAD Restructuring Policy Notice (RPN), the CPUC will conduct a Benefit of the Bargain (BOTB) round. The BOTB round will permit all applicants, regardless of technology employed or prior participation in the program, to participate in the BEAD program under the restructured rules and policies instituted by the RPN. After the BOTB round, if time permits, the CPUC may choose to conduct subsequent BOTB rounds or undergo direct negotiations with applicants as additional forms of deconfliction. For more information, please refer to the CPUC's Initial Proposal volume 2 (IPv2) and the NTIA BEAD RPN.	July 17, 2025/BEAD 2.0 V.1
6.	How will the NTIA Restructuring Policy Notice impact how technology is chosen?	Per the NTIA BEAD Restructuring Policy Notice (RPN), the definition of "Priority Broadband Project" has been modified. A Priority Broadband Project will now include all technology types that can meet these standards: • 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 • 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.	July 17, 2025/BEAD 2.0 V.1

		Applicants must submit evidence to demonstrate they meet the definition of Priority Broadband Project if they want their project considered as such. Evidence will be submitted in a template provided by CPUC.	
7.	How do you rate applications proposing wireless technology?	Wireless projects will not be rated differently than any other projects. Per the NTIA Restructuring Policy Notice, the Benefit of the Bargain round is technology-neutral. All applicants, regardless of technology, may seek to have its application considered as a Priority Broadband Project. Applicants must submit evidence to demonstrate they meet the definition of Priority Broadband Project if they want their project considered as such. Evidence will be submitted in a template provided by CPUC. For more information, please refer to the RPN.	July 17, 2025/BEAD 2.0 V.1
8.	Is it possible to break up CBGs if they are very large?.	Large Census Block Groups (CBG) will not be broken up. More information about Project Area definitions can be found in the CPUC's Initial Proposal volume 2 (IPv2).	July 17, 2025/BEAD 2.0 V.1
9.	Is it correct that the cost per BSL is not a scoring factor for the CPUC? Is scoring the only selection criteria or are there other discretionary factors that the CPUC can use (like cost per BSL)?	Per the NTIA Restructuring Policy Notice, the CPUC BEAD scoring criteria has been modified. The CPUC now assesses Minimal BEAD Program Outlay as the sole primary scoring criteria. The CPUC will consider total BEAD funding to a complete project and on a per Broadband Service Location (BSL) basis as conditions for BEAD funding. Affordability and Fair Labor Practices are now removed as primary scoring criteria. Secondary scoring criteria are utilized when applications in the same general project area propose project costs within 15% of the lowest cost proposal on a BSL basis. The secondary scoring criteria specified by NTIA are: • Speed of Network and other technical capabilities – Maximum 90 pts - Applicants are assessed based on download and upload speed of proposed network • Speed of Deployment – 10 pts - Project complete within 36 months of award For more information on the modified BEAD Program scoring rubric, please refer to the BEAD Restructuring Policy Notice. Further guidance on the BEAD restructuring are found the NTIA BEAD FAQ and the NTIA BEAD website.	July 17, 2025/BEAD 2.0 V.1
10.	What is the low-cost service requirement?	Per the BEAD Restructuring Policy Notice, the Low-Cost Service Option (LCSO) requirement has been modified. BEAD subgrantees must still comply with the statutory provision to offer at least one LCSO. Subgrantees are encouraged to offer a market competitive LCSO that will suitably accommodate subgrantee's business case for their project area proposal. The LCSO must offer speeds of at least 100/20 Mbps and	July 17, 2025/BEAD 2.0 V.1

		latency performance of no more than 100 milliseconds. Applicants that already offer a low-cost plan that meets these service requirements may satisfy the LCSO requirement by proposing to offer their existing low-cost plan to eligible subscribers. NTIA has also redefined "eligible subscriber" to match the eligibility criteria for the FCC's Lifeline Program. For more information on the modified BEAD Program LCSO requirements, please refer to the BEAD Restructuring Policy Notice. Further guidance on the BEAD restructuring is found in the NTIA BEAD FAQ and the NTIA BEAD website.	
11.	What are the details on subgrantee compliance?	For more information about Subgrantee Selection Process compliance, please refer to the CPUC's Initial Proposal volume 2 (IPv2) Sections 17.2, 17.2, 17.3, and 17.4 for more information. Please be advised that the NTIA BEAD Restructuring Policy Notice (RPN) has modified BEAD program elements. Further guidance on the BEAD modifications are found in the NTIA BEAD FAQ and the NTIA BEAD website.	July 17, 2025/BEAD 2.0 V.1
12.	How does the BEAD selection process relate to FFA funding?	BEAD and FFA are separate programs with distinct rules and requirements. The awarding of BEAD funds is independent of the FFA program, and locations that receive FFA funding are not eligible for BEAD funding. Per the NTIA Notice of Funding Opportunity (NOFO) P. 36-37, locations funded through other programs cannot receive duplicate funding. For more information on FFA rules and timelines, visit the Last Mile Federal Funding Account page.	July 17, 2025/BEAD 2.0 V.1
13.	Can we apply for BEAD funding to install fiber in up to 3 Underserved and Unserved locations in an area? Are we required to serve the entire CBG?	Unserved and underserved locations approved by the CPUC and NTIA are eligible for BEAD funding. Qualified applicants who commit to serving these locations can apply for a BEAD subgrant. Applicants must apply to serve at least 60% of eligible and fundable unserved and underserved locations in their project area. A project area consists of one or more Project Area Units (PAU), which include Census Block Group (CBG) or Tribal areas. Applicants can aggregate multiple PAUs within a proposal to form a larger project area.	July 17, 2025/BEAD 2.0 V.1
14.	Will California be doing fixed awards for BEAD?	The CPUC's Initial Proposal volume 2 (IPv2) states, "Consistent with California's desire to avail itself of NTIA-permitted 2 C.F.R. Part 200 exceptions, the CPUC may provide subgrants as fixed-amount subawards."	July 17, 2025/BEAD 2.0 V.1
15.	Do you plan to have a 2nd round of applications if not all eligible locations are taken in the 1st round?	As BEAD 2.0 is operating within a compressed timeline, the CPUC encourages subgrantees to offer their most competitive cost per project area proposal. There may not be sufficient time for additional rounds.	July 17, 2025/BEAD 2.0 V.1

16.	If an FFA grant is insufficient to serve all locations in a project area, can applicants seek BEAD funding for the remaining FFA locations?	Yes, locations in your area can be funded with BEAD funds **if they are BEAD-eligible locations and not subject to enforceable commitments** (e.g. through the FFA Program). The map in the application portal incorporates enforceable commitments from internet service providers, recent grant defaults, and excludes locations from funding that there were removed in the latest FCC address fabric and certain locations with demonstrated BEAD-compliant unlicensed fixed wireless service.	July 17, 2025/BEAD 2.0 V.1
17.	Are community anchor institutions (CAI) the third priority for BEAD grant awards? If so, how likely are applications focused on serving CAIs to receive funding?	At this time, the CPUC cannot determine the likelihood of funding for CAI-focused applications. Per the BEAD NOFO and the NTIA BEAD Restructuring Policy Notice, the CPUC's primary goal is to ensure that the highest amount of unserved and underserved BSLs eligible for BEAD are served. During the Application Phase, the CPUC will assess the extent to which CAIs can be funded. Applicants may include CAIs in their Project Application, but the Minimal BEAD Outlay scoring criterion uses cost per BSL as a determining factor, which does not include CAIs.	July 17, 2025/BEAD 2.0 V.1
18.	Is there guidance on what would be considered too high for an application's cost per location?	The CPUC cannot define a specific cost threshold. Given the compressed application review timeline and the restructured BEAD scoring rubric, applicants should submit their most competitive cost-per-location pricing.	July 17, 2025/BEAD 2.0 V.1
19.	Will the CPUC be publishing a list of successfully prequalified ISPs?	The CPUC will not publish a full list of prequalified ISPs.	July 17, 2025/BEAD 2.0 V.1
20.	Are leased backhaul costs allowable under the BEAD program, and are there specific requirements for reimbursement?	Yes, leased backhaul costs are allowable under the BEAD program. According to the NOFO Section IV.B.7.a.ii (p.39), eligible uses of BEAD funding for last-mile broadband infrastructure include: 1. Construction, improvement, and/or acquisition of facilities and telecommunications equipment required to provide qualifying broadband service. This includes infrastructure for backhaul, middle-mile, last-mile networks, and multi-tenant buildings. 2. Long-term leases (i.e. greater than one year) of facilities required to provide qualifying broadband service, including indefeasible right-of-use (IRU) agreements.	July 17, 2025/BEAD 2.0 V.1
21.	Can the lead applicant in a multi-county Memorandum of Understanding (MOU) respond to Prequalification Application questions and documentation on behalf of all participating	In a partnership, each member that is contributing capacity to the project – whether financial, technical, or operational – must submit a Prequalification Application. This allows the CPUC to assess the qualifications and resources of all entities involved. For the Project Application, only the lead applicant may submit the application. All project partners must be	July 17, 2025/BEAD 2.0 V.1

	counties, or must each county submit individually? Does this apply also for the Project Application?	identified in the Partnerships template in the Project Application. Note: This reflects CPUC policy guidance, which requires transparency around the capacity and experience of all contributing entities (see also Q16 in the Financial Capacity and Requirement section of the FAQ).	
22.	Should projects funded by public grants awarded to another entity (in a case where our organization was contracted to do the work) be included in the 3.3A "Other Funding Template"?	An applicant should include any broadband deployment projects for which the applicant has received or is expected to receive public funding, whether state or federal. If your organization was not the direct recipient of the grant, you are not required to include the project in the template in question 3.3A. However, you are welcome to list and provide details about the project if it helps demonstrate your organization's capability to manage a grant-funded project.	July 17, 2025/BEAD 2.0 V.1
23.	Is a $0 grant request acceptable in the application process? Or is it preferred to request a low nominal amount?	Yes, a $0 grant request is acceptable.	July 17, 2025/BEAD 2.0 V.1
24.	What is the process for challenging a BEAD application?	The CPUC conducted a Challenge Process in 2024, prior to the BEAD Subgrantee Selection Process. In accordance with NTIA's BEAD Challenge Process Policy Notice, only permissible challengers – units of local and tribal government, nonprofit organizations, and broadband service providers – were eligible to participate in the BEAD Challenge Process. Before NTIA approves the CPUC's Final Proposal, a public comment period will be held. Parties registered with the CPUC for Proceeding R. 23-02-016 may submit comments during this period. To register as a party, please refer to the Methods for Becoming a Party to a Proceeding - Rule 1.4 webpage. For more details on the CPUC BEAD timeline and process, please visit the BEAD Program webpage.	July 17, 2025/BEAD 2.0 V.1
25.	Has the 90% secondary project rule been removed in BEAD 2.0 (Benefit of the Bargain Round)? What are the parameters around percentage coverage? Can projects go below 90% coverage?	Yes, the 100% and 90% minimum coverage threshold for BSLs have been removed. Under BEAD 2.0, applicants are now required to serve at **least 60% of eligible and fundable unserved and underserved locations** within their project area. ▪ This coverage percentage **does not include indicated locations** ▪ Applicants may choose to exclude certain high-cost BSLs, but must still meet the 60% minimum threshold coverage requirement across their proposed project area.	July 22, 2025/BEAD 2.0 V.2

26.	Has NTIA removed the extremely high cost per location threshold? Is there a funding cap or suggested amount to not exceed?	The Extremely High Cost per Location Threshold (EHCPLT) requirement has been removed per the NTIA BEAD Restructuring Policy Notice. The CPUC is no longer required to use the EHCPLT as a mechanism to determine high-cost areas; however, the CPUC may reject proposals deemed to have excessive costs given the budget for the PAUs proposed and for the state as a whole. There is not a specific funding cap or suggested amount to not exceed. Under the revised rules, BEAD Outlay is now the sole primary scoring criterion. However, NTIA may reject proposals it considers having excessive costs. Applicants are therefore encouraged to submit the most cost-effective proposals that are feasible for their project area.	July 22, 2025/BEAD 2.0 V.2
27.	Will the new scoring criteria, which prioritize lowest cost, favor certain technologies over others?	No. The NTIA Restructuring Policy Notice emphasizes that the BEAD program must remain technology-neutral and technologies cannot categorically be excluded. However, each proposal will be evaluated on whether it: ▪ Qualifies as Priority Broadband Project; and ▪ Meets technical and performance standards outlined in the Policy Notice. Scoring criteria will follow NTIA guidelines: ▪ Primary scoring is based on Minimal BEAD Outlay ▪ If multiple proposals for the same general area are within 15% of the lowest-cost proposal, then secondary scoring will apply. ▪ In California, secondary criteria include speed to deployment and network speed. For more information, see the NTIA Restructuring Policy Notice and the July 18, 2025, BEAD webinar. Refer to the Prequalification Application Guide, Project Application Guide, and application templates found on the CPUC BEAD webpage for more guidance.	July 22, 2025/BEAD 2.0 V.2
28.	How will the CPUC evaluate claims of scalability in applications?	The CPUC will conduct a rigorous technical review of all submitted evidence, including responses to questions and technical templates related to scalability. Applications that lack sufficient information to support this analysis may be deemed ineligible for award consideration: ▪ Applicants must complete all required templates and questions to allow CPUC to evaluate scalability and other technical criteria. ▪ This review helps determine Priority status and scalability. Refer to the Prequalification Application Guide, Project Application Guide, and application templates found on the CPUC BEAD webpage for more guidance.	July 22, 2025/BEAD 2.0 V.2

29.	Can we include any number of locations in our application, as long as we follow the project area rules?	Applicants may exclude select broadband serviceable locations (BSLs), particularly excessively high-cost locations or those that would render a project economically unviable for the technology being used. However, applicants must still: ▪ Meet the minimum 60% coverage threshold for eligible and fundable unserved and underserved locations; and ▪ Follow all project area definition rules. Coverage calculations exclude indicated locations.	July 22, 2025/BEAD 2.0 V.2

General Application Information

#	Questions	Answers	Date/Version
1.	Where can I find information about the prequalification requirements?	Details about the Prequalification requirements in the Subgrantee Selection Process are included in the CPUC's Initial Proposal volume 2 (IPv2) Section 5.1.4.1, available for download on the CPUC BEAD Program website. The CPUC hosted a webinar on BEAD Subgrantee Selection Process on December 3, 2024, which contains details of the Prequalification phase; the webinar from July 11, 2025, outlines updates to the Prequalification process. The July 11 webinar presentation materials are available here, and the webinar recording can be accessed here. The CPUC has also published the BEAD 2.0 – CPUC Prequalification Guide which details specific questions and instructions for the Prequalification Round 2 Please be advised that BEAD Prequalification elements have been modified by NTIA, and these modifications are fully outlined in the BEAD Restructuring Policy Notice. The Prequalification period has been re-opened and existing pre-qualified applicants do not need to resubmit their documentation. Applicants who were not previously approved for Prequalification may amend their applications and re-apply for Prequalification, and new applicants are encouraged to apply. Please visit the CPUC BEAD webpage for updates on the Prequalification period. Further guidance on the BEAD Prequalification modifications can be found in the NTIA BEAD FAQ and the NTIA BEAD website. The CPUC provides Subgrantee Selection Process training and technical support, which can also be found on the CPUC BEAD Program website.	July 17, 2025/BEAD 2.0 V.1
2.	What factors will be used to determine which subgrantees are selected?	Per the NTIA BEAD Restructuring Policy Notice, the CPUC BEAD selection criteria has been modified. Subgrantees must now submit proposals with a 60% minimum threshold of unserved or underserved BSLs in their project application proposals. Proposals will be ranked as a Priority Broadband Project or Non-Priority Broadband Project based on these qualifications: • 100MB/20MB download and upload speeds • Less than or equal to 100ms latency • 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.	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		These proposals will now be assessed with Minimum BEAD Program Outlay as the sole primary scoring criteria, which is now based on cost. The CPUC will consider total BEAD funding to complete a project and on a per Broadband Service Location (BSL) basis as conditions for BEAD funding. CPUC will select the combination of proposals with lowest overall cost to the BEAD Program. Affordability and Fair Labor Practices are now removed as primary scoring criteria. Secondary scoring criteria is utilized when applications in the same general project area propose project costs within 15% of the lowest cost proposal on a BSL basis. The secondary scoring criteria specified by NTIA are: • Speed of Network and other technical capabilities – Maximum 90 pts - applicants are assessed based on download and upload speed of proposed network • Speed of Deployment – 10 pts - Project complete within 36 months of award For more information on the modified BEAD Program scoring rubric, please refer to the BEAD Restructuring Policy Notice. Further guidance on the BEAD restructuring is found in the NTIA BEAD FAQ and on the NTIA BEAD website.	
3.	Will the public be able to see the technical specs that applicants submit and what will the process be to do so?	Detailed network designs and technical specifications will not be disclosed to the public.	July 17, 2025/BEAD 2.0 V.1
4.	What do we need to do now to qualify? For example, if we are a CLEC do we need to provide audited financials or matching funds?	All applicants must submit: audited financials (or equivalent documentation, depending on the entity); a letter of commitment for a letter of credit or performance bond; and for most areas, matching funds of at least 25 percent of the total project cost (which is not required in NTIA-designated "High Cost Areas"). See Section 5.12.1 of the CPUC's Initial Proposal volume 2 (IPv2) or the Financial Requirements webinar for more information. Some of these materials will be required for prequalification, while others will be required in the main application that will be scored.	July 17, 2025/BEAD 2.0 V.1
5.	What type of PE license is required?	Professional Engineer must be a Licensed Professional Engineer with a "clear" status. The license can be from any state or other eligible entity. See IPv2, p. 68.	July 17, 2025/BEAD 2.0 V.1
6.	Will the applicants receive any points for working with a government or nonprofit?	No, there will be no scoring points awarded for working with a government or nonprofit. For more details on the	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		updated Subgrantee Selection Process scoring criteria, please refer to the NTIA Restructuring Policy Notice	
7.	Aside from a basic SAM.gov registration number, is there anything more at SAM that is needed?	Currently, only a basic SAM.gov registration number is required, but this may be subject to change. Check the CPUC BEAD Program website regularly for updates or email BEADgrant@cpuc.ca.gov with any inquiries.	July 17, 2025/BEAD 2.0 V.1
8.	Will we need to submit our Cyber Security and Supply Chain Risk management at the time of the application, or at the time of the award?	As stated in the CPUC's Initial Proposal volume 2 (IPv2), applicants must attest that they: ▪ Have cybersecurity and supply chain risk management plans that are either operational (if they currently provide service) or ready to be operationalized upon service provision (if they do not yet provide service). ▪ Ensure their plans align with the latest National Institute of Standards and Technology (NIST) frameworks and guidance (see IPv2, p. 221 for details). ▪ Commit to regularly reevaluating and updating their plans. ▪ Submit their plans to the CPUC before the allocation of funds and provide a new version within 30 days if substantive changes occur. For more details, see IPv2, p. 220-221. According to IPv2, these plans must be submitted to the CPUC "prior to the allocation of funds." However, at the time of the application, applicants are only required to submit the attestations listed above and indicate how frequently their plans are updated. These plans will not be scored but will be reviewed to determine the applicant's eligibility to participate. Therefore, it is advisable to submit these attestations when the application window opens.	July 17, 2025/BEAD 2.0 V.1
9.	Are pre-application expenses allowable as part of the project application costs? If so, is there a cap on these expenses?	NTIA allows certain pre-application BEAD-eligible costs, but expenses related to preparing and submitting an application are not included. Additionally, applicants assume the risk for any pre-application costs incurred before receiving a formal subgrant award. To be eligible, pre-application costs must: ▪ be costs that would have been allowable if incurred post-award. ▪ Comply with grant requirements, including Build America, Buy America (BABA). ▪ Adhere to the cost principles outlined in 2 CFR 200. For example, engineering work required for an environmental assessment is typically an allowable pre-application expense. There is no cap for pre-application	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		expenses, but applicants must include these costs in their financial, budget, and pro forma documentation within the application.	
10.	Is prequalification required?	Yes, all applicants must respond to all prequalification questions and submit any required materials. Submitted materials and certifications will be evaluated to determine whether the entity is eligible to participate in the process and qualify for BEAD grant funding. For more details, see the CPUC's Initial Proposal volume 2 (IPv2), Section 5.3.1. Please be advised that BEAD Prequalification elements have been modified by NTIA, and these modifications are fully outlined in the BEAD Restructuring Policy Notice. Please visit the CPUC BEAD webpage for updates on the Prequalification period. Further guidance on the BEAD Prequalification modifications can be found in the NTIA BEAD FAQ and the NTIA BEAD website.	July 17, 2025/BEAD 2.0 V.1
11.	If an applicant fails to submit their Prequalification Application by the end of the Prequalification period, will they be prohibited from submitting a Project Application?	Yes. Applicants who do not complete a Prequalification Application will not be allowed to submit a Project Application. However, the CPUC may modify or adjust the timeline as necessary. Please check the CPUC website regularly for updates.	July 17, 2025/BEAD 2.0 V.1
12.	Can applicants add collaborators in the portal to assist with completing the application?	Yes, the primary user can register within the application portal and add additional users as needed. To add additional users, go to the "Team" box on the Home dashboard, and select "Invite Teammates."	July 17, 2025/BEAD 2.0 V.1
13.	If submitting multiple applications under different entities (e.g., a parent company and an affiliate), is a separate Prequalification Application required for each?	Yes, each entity must submit a separate Prequalification Application, as financial, managerial, and operational capacity responses will differ.	July 17, 2025/BEAD 2.0 V.1
14.	For Question 4.6C, does the Ownership Information template uploaded in Question 4.6 satisfy the requirement, or is further documentation needed? What certifications must the applicant complete to ensure compliance with regulatory requirements?	The Ownership Information template is sufficient as a response for question 4.6C if it is complete and includes all required details per 47 CFR 1.2112(a)(1)-(7). Applicants must also check the certification box in question 4.6B of the Prequalification Application to confirm no collusion, bias, or conflict of interest. Additionally, the certification in question 10.36 of the Project Application applies to conflicts of interest.	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
15.	What is the estimated timeline for Prequalification Application approval, and when applicants can proceed with their Project Applications?	The review depends on application volume, and an exact estimate cannot be provided. Once a Prequalification Application is submitted, applicants may proceed with their Project Application immediately. Given the accelerated timeline in the BEAD Restructuring Policy Notice, there may not be time for application revision requests. Applicants should ensure accuracy and conduct multiple quality control reviews before submission. Please refer to the CPUC BEAD webpage for the updated BEAD 2.0 timeline. This timeline is provisional and may be subject to modification.	July 17, 2025/BEAD 2.0 V.1
16.	For applicants who have not participated in FCC auctions or filed form 175, what documentation, if any, is required to satisfy the ownership disclosure requirements? (Application Question 4.6)	Applicants who have not participated in FCC auctions or filed Form 175 must complete the Ownership Information template to satisfy the ownership disclosure requirements for Question 4.6C. The template must be fully completed and include all required information in accordance with 47 CFR 1.2112(a)(1)-(7). Additionally, applicants must check the certification box in Question 4.6B of the Prequalification Application to affirm that there is no collusion, bias, or conflict of interest. The certification in Question 10.36 of the Project Application also applies and serves as an additional attestation regarding conflicts of interest.	July 17, 2025/BEAD 2.0 V.1
17.	What does the "FireDistrict" column in the newly released "Indicated" file represent, and must BSLs marked as "true" in this column be excluded from a proposed project?	There is no longer a "FireDistrict" column in the "Indicated" file. Applications will not be scored or evaluated based on High Fire Threat districts. The "Indicated" file identifies locations that are likely to be funded by an enforceable commitment and are therefore unlikely to be eligible for BEAD funding. (A final determination regarding enforceable commitment locations is still pending.) Applicants may choose to include Project Area Units (PAUs) that contain "Indicated" locations in their proposed projects. However, any locations ultimately confirmed as served by the Federal Funding Account (FFA), California Advanced Services Fund (CASF), or another enforceable commitment will be deemed ineligible for BEAD funding and will be removed during the negotiation process.	July 17, 2025/BEAD 2.0 V.1
18.	Is there a specific time period that applies when responding to questions about legal compliance, environmental and historic preservation requirements, and outstanding judgments and financial obligations? (Application Sections 4 & 7)	Yes, the questions related to past compliance refer to the three years preceding the date of application submission.	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
19.	Can additional information be added after submitting the Prequalification Application and Project Application?	Due to the portal's configuration, applicants cannot modify an application after it has been submitted. After submission, applicants may only revise content in response to a specific post-submission revision request from the CPUC. Questions 6.1 and 7.1 of the Project Application allow applicants to update certain materials originally provided in the Prequalification Application. These questions permit applicants to update financial, managerial, and organizational information if there have been changes to the applicant's capacity in those areas after submitting the Prequalification Application. Once both the Prequalification and Project Application have been submitted, no further updates may be made without a revision request from the CPUC. For more information, refer to the Prequalification Application guide and Project Application guide. More application resources can be found the CPUC BEAD webpage.	July 17, 2025/BEAD 2.0 V.1 Updated July 22, 2025
20.	Do applicants need to submit a new notarized "CPUC Application Affidavit for Non-Telephone Corporation," or can they use the same one submitted during prequalification?	Applicants must submit a new form with the relevant title for each required submission. While the content of the forms are similar, their titles differ, and a correctly titled form must be submitted with each application. Applicants must separately affirm each successive application.	July 17, 2025/BEAD 2.0 V.1
21.	Can applicants submit a BEAD Project Application while their prequalification still has "in review" status?	Yes, applicants can submit their BEAD Project Application(s) even if their Prequalification Application is still listed as "In Review." To help ensure timely submission, we encourage applicants to submit their Project Application(s) as soon as it is complete. Applicants do not need to wait for formal approval of their Prequalification Application to move forward.	July 17, 2025/BEAD 2.0 V.1
22.	Can applicants update administrative information (e.g., the Authorized Certifying Official) after the Prequalification Application has been submitted?	Due to the portal configuration, applicants cannot modify their Prequalification Applications after submission, except in response to a specific revision request from the CPUC.	July 17, 2025/BEAD 2.0 V.1
23.	What will be done with entities who submitted applications in Round 1?	BEAD Prequalification process has been revised by NTIA, as outlined in the NTIA Restructuring Policy Notice. The Prequalification period has been re-opened. Entities that were already approved for Prequalification were not required to resubmit documentation. Applicants who were not previously approved for Prequalification were given the opportunity to revise and reapply, and new applicants were encouraged to submit a Prequalification	July 22, 2025/BEAD 2.0 V.2

#	Questions	Answers	Date/Version
		Application. Please note that submitting a Prequalification Application is required to participate in the Benefit of the Bargain (BOTB) round. The BOTB round allows all applicants, regardless of technology used or prior participation, to apply under the restructured BEAD rules and policies. Applicants who wish to stand on their existing applications from the previous Subgrantee Selection Process may do so; those applications will be evaluated using the updated BEAD scoring rubric. Applications submitted previously will be carried over into the new application format for updates and resubmission. Returning applicants must edit their Project Applications in the BEAD portal before resubmitting. All applicants must submit either a new application or a resubmission of an existing one in order to be considered for funding. All returning applicants will need to submit supplemental information and resubmit location selection. For more information, refer to the Prequalification Application guide and Project Application guide. More application resources can be found the CPUC BEAD webpage.	
24.	Are there still funds available to reach those still not able to get higher quality FWA or even fiber service?	Yes. Under BEAD rules, funding must first target unserved/underserved locations. If funds remain after those areas are addressed, Community Anchor Institutions (CAI) may then be funded.	July 22, 2025/BEAD 2.0 V.2

BEAD Program Timeline

#	Questions	Answers	Date/Version
1.	What is the BEAD 2.0 Program timeline?	The California Public Utilities Commission (CPUC) has announced the timeline for the Broadband Equity, Access, and Deployment (BEAD) 2.0 program rollout. The Prequalification Application window will open on July 11th, 2025 and close on July 17th, 2025 (6pm Pacific Time). The Benefit of the Bargain round will open on July 19th, 2025 and close on August 2, 2025 (6pm Pacific Time). Please note that the BEAD program timeline is provisional and subject to modification. To view the CPUC BEAD Timeline, visit the CPUC BEAD Program website.	July 17, 2025/BEAD 2.0 V.1
2.	Which release are you using for the fabric locations? Version 3 or 4?	The post-challenge interactive map reflects Fabric version 4, dated December 31, 2023. Per NTIA's Policy Notice, the CPUC updated its BEAD-eligible locations list to remove locations that were removed in version 6 of the FCC Address Fabric. It also removed certain locations based on an Unlicensed Fixed Wireless information gathering process per NTIA's Policy Notice. To view the final CPUC BEAD Map, review the map in the application portal and data files on the CPUC's website. The map is subject to revision and modification in order to capture state and federal enforceable commitments, and to align with NTIA reconciliation guidelines and NTIA Restructuring Policy Notice.	July 17, 2025/BEAD 2.0 V.1
3.	When will the BEAD application be available, and how long will the application window be open?	The CPUC has modified application materials and the grant application window to align with the NTIA BEAD Restructuring Policy Notice. The CPUC BEAD 2.0 application materials can be found on the CPUC BEAD webpage. The Prequalification Application window opened on July 11th, 2025 and closes on July 17th, 2025 (6pm Pacific Time). The Benefit of the Bargain round will open on July 19th, 2025 and close on August 2, 2025 (6pm Pacific Time). Please note that the BEAD program timeline is provisional and subject to modification. Please visit the CPUC BEAD Program website or sign up for the CPUC BEAD email list for the latest updates.	July 17, 2025/BEAD 2.0 V.1 Updated July 22, 2025
4.	How long will each grant last?	Based on the BEAD requirements, each grant will last up to four years, covering the full deployment timeline, including planning, design, procurement, construction, installation, network turn-up, testing, and service initiation.	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		Deployment milestones must also account for necessary permits and CEQA approval. See the CPUC's Initial Proposal volume 2 (IPv2) Section 5.3.2 and 5.12.3.5 and Notice of Funding Opportunity (NOFO) p.18 for more details.	
5.	When will the PAU map be released, and where can it be found?	The PAU map will be available when the Application Portal opens for applicants to begin the application process. The CPUC will announce when the Application Portal becomes accessible. To view the CPUC BEAD Timeline, visit the CPUC BEAD Program website.	July 17, 2025/BEAD 2.0 V.1
6.	What is the expected timeframe for payment to awardees from grant funds after completing a milestone? How many milestones can be set for a project?	The CPUC will issue more guidance on its plans for compliance and monitoring, including timeframes for reimbursement, following the conclusion of the subgrantee selection process. NTIA allows for states to use fixed amount subawards as a framework for reimbursements (see here), and the CPUC's IPv2 states that "consistent with California's desire to avail itself of NTIA-permitted 2 C.F.R. Part 200 exceptions, the CPUC may provide subgrants as fixed-amount subawards." The CPUC is still determining how it could implement fixed amount subawards and will provide guidance once it has made a determination.	July 17, 2025/BEAD 2.0 V.1
7.	What is the timeline for revision requests once the application has been submitted?	If you receive a revision request, you must respond within three business days. **Due to the extremely compressed timeline for BEAD 2.0, there may not be additional opportunities for revisions** so applicants are encouraged to submit complete and accurate applications.	July 17, 2025/BEAD 2.0 V.1

BEAD Training and Resources

#	Questions	Answers	Date/Version
1.	Where can I find training information? Where will slide decks be posted for access after webinars?	The CPUC provides Subgrantee Selection Process training and technical support, which can be found on the CPUC BEAD Program website and the BEAD Subgrantee Selection Process webpage.	July 17, 2025/BEAD 2.0 V.1

Technical Assistance & Support

#	Questions	Answers	Date/Version
1.	What process will be used to ask questions and what is the estimated response time during the application window?	The CPUC is committed to addressing your questions as promptly as possible. Applicants can email BEADgrant@cpuc.ca.gov for inquiries about the Subgrantee Selection Process. Due to a high volume of inquiries, we aim to respond as soon as possible. The CPUC will also host Office Hours in the coming weeks where applicants have the opportunity to ask questions about the recent changes to the BEAD Subgrantee Selection Process. For more information about Office Hours times, please visit the CPUC BEAD webpage or sign up for the CPUC BEAD email list for the latest updates.	July 17, 2025/BEAD 2.0 V.1
2.	Will there be technical assistance provided through the process?	The CPUC provides Subgrantee Selection Process training and technical support, which can be found on the CPUC BEAD Program website. For Subgrantee Selection Process inquiries, please email BEADgrant@cpuc.ca.gov. For questions about the BEAD Application Portal or technical support, contact Ready.net at cahelpdesk@ready.net.	July 17, 2025/BEAD 2.0 V.1
3.	How often is the FAQ document updated, and where can the most recent version be found?	The CPUC aims to update and publicly release the FAQ document on a regular basis, depending on the volume and complexity of questions received. Please check both the CPUC BEAD Program website and the BEAD FAQ page regularly for the most recent version. Please check both the CPUC BEAD Program website regularly for the most recent version.	July 17, 2025/BEAD 2.0 V.1 Updated July 22, 2025
4.	Where can applicants find the list of required licenses and certifications mentioned in the Prequalification Guide (question 3.65A) and referenced in IPv2 (section 5.12.3.2)?	A comprehensive list of required licenses and certifications has not been published, as these may vary depending on the applicant's entity type and the proposed technology. In general, applicants should submit any licenses or certifications that demonstrate their organization's operational capacity to successfully deploy a broadband project. This includes credentials that support their ability to complete the project – such as specific licenses held by key engineers or staff. Some requirements may be technology-specific and should be tailored accordingly.	July 17, 2025/BEAD 2.0 V.1

Financial Capacity & Requirements

#	Questions	Answers	Date/Version
1.	What are the BEAD financial requirements?	Details about the Financial requirements in the Subgrantee Selection Process are included in the CPUC's Initial Proposal volume 2 (IPv2) Section 5.12.1, available for download on the CPUC BEAD Program website. The CPUC provides Subgrantee Selection Process training and technical support, which can be found on the CPUC BEAD Program website. The CPUC hosted a webinar on BEAD Applicant Financial Requirements on January 9, 2025. The presentation materials are available here, and the webinar recording can be accessed here.	July 17, 2025/BEAD 2.0 V.1
2.	What are the CPUC's match requirements?	For most project areas, subgrantees must provide matching funds of at least 25 percent of total project costs, which can be provided as cash or in-kind. Matching contributions, including in-kind contributions, demonstrate commitment to a particular project and minimize BEAD funding outlay. For areas designated by NTIA as "high-cost," there is no match requirement. A high-cost area is a Census Block Group with at least 80 percent unserved locations in which NTIA has determined that the lifetime cost of building and operating broadband service is higher compared to the average cost of unserved areas. See pp. 3, 13, and 20 of the BEAD NOFO. NTIA has released a list of these areas, which the CPUC will make available as part of the application process. Details about the match requirements in the Subgrantee Selection Process are included in the CPUC's Initial Proposal volume 2 (IPv2) Section 5.3.2, available for download on the CPUC BEAD Program website. The CPUC hosted a webinar on BEAD Matching Funds on January 21, 2025. The presentation materials are available here, and the webinar recording can be accessed here. Additionally, the NTIA has released the BEAD Match Primer, a guidance resource for Eligible Entities on matching funds.	July 17, 2025/BEAD 2.0 V.1
3.	a) The audited financial statement requirement is very difficult for small companies. Our audited financial statements will likely not be ready in the required	a) In the application, if a potential subgrantee does not have audited financial statements in the ordinary course of business, it must describe the circumstances and reasons for the lack of audited financials and provide financial statements from the prior fiscal year that contain substantially the same level of detail and	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
	timeframe. Can you give us any advice on how best to comply with this requirement in time to try and be a subgrantee? Can the cost of acquiring the audited financials be an eligible reimbursable cost under the grant? Can the audited financials be provided after the grant is awarded? b) We are assuming the challenge map that shows unserved and underserved areas in pink and blue are areas the CPUC would be able to accept and review and award projects on. Is this a correct assumption?	information. A potential subgrantee without audited financial statements must also certify that it will provide audited financials within 12 weeks of submitting its application. Given the Subgrantee Selection Process timeline, the CPUC may accept 2023 audited financial statements. See CPUC's Initial Proposal volume 2 (IPv2) Section 5.12.1.3 for more details on financial statements. Certain expenses incurred during application preparation and prior to award may be eligible if they are expenses that are eligible post-award project expenses and would have otherwise been incurred after the award. For example, expenses related to EHP preparation and consulting with federal agencies may be considered eligible expenses. However, audited financials do not fall into this category of expenses. b) The California Public Utilities Commission (CPUC) has released the map for the Broadband Equity, Access, and Deployment (BEAD) program rollout. To view the CPUC BEAD Map, visit the CPUC BEAD Program website. The map is subject to revision and modification in order to capture state and federal enforceable commitments or align with NTIA reconciliation guidelines and the NTIA Restructuring Policy Notice.	
4.	Can an applicant use their parent company's audited financial statements for the application with the understanding that if there is a BEAD award, the subsidiary company would need to comply with the FCC CFR single-audit requirement and have its own audit completed going forward?	An applicant may submit parent company audited financials as long as those financials include financials for the applicant as a subsidiary entity. Details about the Financial requirements in the Subgrantee Selection Process are included in the CPUC's Initial Proposal volume 2 (IPv2) Section 5.12.1, available for download on the CPUC BEAD Program website. The CPUC provides Subgrantee Selection Process training and technical support, which can be found on the CPUC BEAD Program website. The CPUC hosted a webinar on BEAD Applicant Financial Requirements on January 9, 2025. The presentation materials and the webinar recording can be accessed here and here.	July 17, 2025/BEAD 2.0 V.1
5.	If an applicant indicates that they will be using a Performance Bond, are they allowed to instead provide a Letter of Credit once approved for BEAD?	An applicant may provide an alternative acceptable form of fulfilling the letter of credit or performance bond requirement than the one described in the application, but it must explain the reason for changing and the chosen form must satisfy BEAD program requirements. See CPUC's Initial Proposal volume 2 (IPv2) Section 5.12.1.2 for more details.	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		Details about the Financial requirements in the Subgrantee Selection Process are included in the CPUC's Initial Proposal volume 2 (IPv2) Section 5.12.1, available for download on the CPUC BEAD Program website. The CPUC provides Subgrantee Selection Process training and technical support, webinar and presentation slides can be found on the BEAD Events webpage. The CPUC hosted a webinar on BEAD Applicant Financial Requirements on January 9, 2025. The presentation materials and the webinar recording can be accessed here and here.	
6.	If an applicant has a proforma model they use internally, can that be submitted for the BEAD application instead of using the template?	Applicants must use the CPUC-provided template to ensure consistent information from each applicant. A detailed overview of the Subgrantee Selection Process is provided in the CPUC's Initial Proposal volume 2 (IPv2), available on the CPUC BEAD Program website. The CPUC hosted a webinar on BEAD Subgrantee Selection Process on December 3, 2024, and an additional webinar was hosted on July 11, 2025, on the recent updates to the program. Please be advised that BEAD Program elements have been modified by NTIA, these modifications are outlined in the BEAD Restructuring Policy Notice.	July 17, 2025/BEAD 2.0 V.1
7.	Are audited financial statements required at the time of application or only after a grant is awarded?	Audited financial statements are required during the application phase. According to Section 5.12.1.3 of the CPUC's Initial Proposal volume 2 (IPv2), applicants must submit audited financial statements from the prior fiscal year, prepared by an independent certified public accountant. If an applicant does not have audited financials as part of its ordinary business operations, it must: ▪ Explain why audited financials are unavailable. ▪ Provide financial statements from the prior fiscal year with equivalent detail. ▪ Certify that it will submit audited financials within 12 weeks of applying. Alternative financial reporting options are available for public or similar entities with different requirements.	July 17, 2025/BEAD 2.0 V.1
8.	Our BEAD project area will consist of two adjacent Census Block Groups (CBGs). One has been designated as High-Cost by the NTIA and is exempt from	The match requirement will be calculated as a proportion of the number of BSLs in the High-Cost PAUs to the total BSLs in all project PAUs. For example, if the total number of eligible BSLs in a proposed project is 100, and 10 of these are in High-Cost PAUs, then the	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
	the 25% matching funds rule; the other requires a 25% match. How is the match requirement calculated?	minimum match requirement that would apply to the project as a whole would be: [(100-10) x 25% + (10 x 0%]/100 = 22.5%	
9.	Nonprofits encounter challenges with the Letter of Credit (LOC) requirement, which can be difficult for smaller entities to obtain due to limited collateral. Can you provide guidance in navigating the LOC requirement or the LOC waiver process? Are there alternative solutions to meet the requirement, such as holding a CPCN?	NTIA released a waiver that was adopted by CPUC in Initial Proposal volume 2 (IPv2) that allows for alternatives to the 25% letter of credit requirement. These alternatives are: 1) Obtain a performance bond for 100% of the BEAD subaward amount; 2) Choose to have their letter of credit or performance bond obligation progressively reduced (from 25 percent or 100 percent of the subaward amount) with completion of deployment milestones based on a percent buildout completion schedule provided by the CPUC; 3) Request that the committed amount for the letter of credit or the performance bond be reduced where: a) Funding will be issued on a reimbursable basis and the CPUC has implemented all other subgrantee accountability measures as set out in the BEAD NOFO rules (Section IV.C.1.b); b) Funding will be on a reimbursable basis for periods of no more than six months; and c) The letter of credit or performance bond remains at 10 percent of the subaward until the subgrantee successfully demonstrates 100 percent project or completion or the period of performance for the subaward has ended. See more information in the webinar on Financial Requirements or the Initial Proposal volume 2 (IPv2), Section 5.12.1.2 on Letter of Credit.	July 17, 2025/BEAD 2.0 V.1
10.	If a county contributes an "in kind" contribution, like access to the county right-of-way to bury fiber, does that "in-kind" contribution go towards the total project cost calculation? How is that valued? Are there other types of "in-kind" contributions by counties that could be included in the total project cost?	Please see the Notice of Funding Opportunity (NOFO) (pp. 20-22) and the webinar on Matching Funds for more information. Generally, in-kind contributions from units of local government like counties can be counted towards the total project cost calculation if they meet requirements. In-kind contributions must be allowable and allocable project expenses. Contributions should be an asset with value and should be dedicated to the project. NTIA listed potential sources of in-kind contributions that, depending on the particular property or service and federal cost principles, could include: "employee or volunteer services; equipment; supplies; indirect	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		costs; computer hardware and software; and use of facilities," as well as "waiver of fees associated with access to rights of way, pole attachments, conduits, easements, or access to other types of infrastructure." In-kind contributions can be valued through the market value (i.e., what is charged normally on the market for that right-of-way fee or piece of equipment).	
11.	Financial surety letters typically specify a set amount. How can we submit these details if our project design isn't finalized by the application window? Can we submit a different amount in the application window?	The application requires a letter of commitment or letter of surety from the financial institution issuing the letter of credit or performance bond. Since the project details may not be finalized at the time of application, the financial institution can provide an "up to" value based on the applicant's estimated needs. After receiving an award, the applicant must submit a finalized letter of credit or performance bond reflecting the exact amount required for the project.	July 17, 2025/BEAD 2.0 V.1
12.	Can existing or funded middle-mile infrastructure be used as an in-kind match?	Yes, existing or funded middle-mile infrastructure can qualify as an in-kind match if it is exclusive to the BEAD project, justified with verifiable market pricing, and unavailable for other uses. In-kind contributions must be "allowable and allocable project expenses" with a defined value and dedicated use within the project. The NTIA identifies potential in-kind contributions such as: • Employee or volunteer services • Equipment and supplies • Indirect costs • Computer hardware and software • Use of facilities • Waived fees for rights of way, pole attachments, conduits, easements, or other infrastructure access. Valuation is based on market value. For more details, see the Notice of Funding Opportunity (NOFO) (pp. 21-22).	July 17, 2025/BEAD 2.0 V.1
13.	Can project expenses not covered by BEAD funds but necessary for full connectivity (e.g., in-home routers) be counted as cash matching funds?	Only eligible BEAD expenses can be used as an in-kind match. Most customer edge equipment (e.g. in-home routers) is not an eligible BEAD expense. However, some combination devices, such as a combined ONT/router, may qualify as necessary provider edge equipment and be eligible for BEAD funding. For more details, see the Notice of Funding Opportunity (NOFO) (pp. 21-22).	July 17, 2025/BEAD 2.0 V.1
14.	Will the CPUC accept a Letter of Bondability prior to issuing a contract to the subgrantee?	The CPUC will not accept a Letter of Bondability. For the full list of acceptable documentation, please refer	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		to the NTIA's BEAD Letter of Credit waiver on the NTIA website.	
15.	Will audited financial statements be required only from the lead applicant in a multi-county Memorandum of Understanding (MOU), or must all participating counties provide them?	Any partner in a multi-county MOU that is contributing capacity to the project – whether financial, technical, or operational – must submit a Prequalification Application, which includes either providing audited financial statements or certifying that the applicant will provide audited financial statements within 12 weeks of submitting a Project Application. Contractors of subgrantees are not required to prequalify.	July 17, 2025/BEAD 2.0 V.1
16.	If BEAD funds are not requested for a project area already served by Reliable Broadband Service, can it be assumed that requirements such as submitting audited financial statements or obtaining a letter of credit will not apply?	Applicants may submit a $0 grant proposal for areas where BEAD funding is not needed. However, all applicants – regardless of funding request – are initially subject to BEAD rules and requirements. There is a process by which applicants can indicate locations are already served and should not receive BEAD funding (see Questions 4 to 7 in the "Post-Challenge Interactive Map" section of this FAQ). If those locations are successfully validated as served, they will be removed from the BEAD award and will not be subject to BEAD rules or requirements.	July 17, 2025/BEAD 2.0 V.1
17.	Can a municipal applicant use backhaul and middle-mile fiber construction as an in-kind match for a BEAD project if the backhaul and middle-mile are within the BEAD project area, even if the last-mile connections aren't eligible for BEAD funding? Are there any restrictions on when backhaul or middle-mile construction can begin, and what are the timeline requirements?	In limited circumstances, backhaul and middle-mile construction may qualify as an in-kind match if it is exclusive to the BEAD project (e.g., a specific number of strands dedicated to BEAD with current market value). If the infrastructure has not yet been completed, it may also qualify as a cash match or eligible expense. However, if the infrastructure is funded federal grants not specifically allowed as match in the IIJA, it is not eligible as an in-kind match. All in-kind match must comply with the requirements for cost justification, fair market value, and record-keeping as outlined in 2 CFR 200.306, available here. Subrecipients will be certifying these costs and justifications and are subject to verification by the CPUC and NTIA.	July 17, 2025/BEAD 2.0 V.1
18.	What types of contributions qualify as cash or in-kind matching funds? Does it include labor/personnel of staff working, donated or loaned equipment, donated materials, real property or space use (easements, ROW, pole attachments), wireless towers/third-party contributions? (Application Section 3.3)	Those are all potentially eligible contributions. In-kind contributions must be allowable and allocable eligible project expenses. Contributions should be an asset with value and should be dedicated to the project. NTIA listed potential sources of in-kind contributions that, depending on the particular property or service and federal cost principles, could include: • Employee services • Volunteer services • Equipment	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		• Supplies • Indirect costs • Computer hardware • Software • Use of facilities • Waiver of fees associated with access to rights of way pole attachments • Conduits • Easements • Access to other types of infrastructure In-kind contributions must be valued at market rate and directly allocatable to the BEAD project (not to other efforts). Waived fees are not permitted as eligible expenses or match. Matching funds must meet the cost justification, fair market value, and record requirements of 2 CFR 200.306. NTIA released a match primer for states that contains relevant information and pages 21-22 of the NOFO describe rules for in-kind match.	
19.	What are the guidelines for in-kind contributions, including eligibility, timing, application toward matching funds, and budget adjustments or match estimates if formal agreements are not finalized before the award? (Application section 3.3)	The relevant award period will be defined in the subaward agreement. In-kind contributions must be valued at fair market rate (e.g., what is charged normally on the market for a piece of equipment) and justified in the application. While additional contributions may be accepted later, applicants must meet the minimum match requirements. All matches must meet the cost justification, fair market value, and record requirements of 2 CFR 200.306.	July 17, 2025/BEAD 2.0 V.1
20.	What is the expected timeline for NEPA approval and the release of funds after a BEAD award, and can pre-award contracts still be eligible if amended to meet federal and state requirements?	Construction costs are not eligible for BEAD funding unless NEPA review has been completed, and the necessary documentation has been approved. Applicants must complete all NEPA requirements before initiating any construction activities. If construction begins prior to NEPA approval, these costs will not be reimbursed. Projects that qualify for Categorical Exclusions under NEPA will typically move through the approval process faster than those requiring more detailed environmental reviews. Construction may only begin after the CPUC has received the NTIA's approval on the project's NEPA documentation and released funds. Note that in addition to NEPA, projects must also undergo review under the California Environmental Quality Act (CEQA). Similarly to NEPA, CEQA reviews must be completed and documentation approved before the project begins construction.	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		For more information about the NEPA process, timeline, and associated requirements, please refer to the CPUC BEAD Other Requirements presentation and slides on the CPUC Events webpage. Additional guidance from NTIA can be found here and here.	
21.	How much detail needs to be provided for prequalification question 2.1Bi about qualified financial statements if a narrative explanation will be provided in question 2.1Eii?	Question 2.1Eii asks for a narrative explanation of the financial documentation provided in 2.1E, specifically describing how those financial statements offer substantially similar information to audited financial statements. A response to this question is only required if an applicant is a public entity as indicated in question 2.1D and submits alternative financial documentation in question 2.1E. In contrast, question 2.1Bi pertains to the financial documentation supplied in 2.1B (qualified audited financial statements). It requires an explanation of the nature of the qualification, the reason for it, and any steps the company has taken to address the qualification, if applicable. A response to this question is only required if an applicant submits qualified audited financial statements in question 2.1B. The questions and narratives are distinct. If a public entity submits both qualified audited financial statements and alternative financial statements that provide similar information, the applicant should submit separate explanations in questions 2.1Bi and 2.1Eii, respectively. Please see pages 12-14 of the Prequalification Application Guide for additional guidance.	July 17, 2025/BEAD 2.0 V.1
22.	Does BEAD allow for contingencies in an applicant's construction budget, and where can guidelines on allowable contingencies be found?	If needed, applicants can incorporate contingencies into their overall project budget in the relevant lines in the project costs template. Contingency provisions are outlined in the Code of Federal Regulations at 2 CFR 200.403. Contingencies may be included in budget estimates for potential costs "associated with possible events or conditions arising from causes for which the precise outcome is indeterminable at the time of estimate and that are likely to result, in the aggregate, in additional costs for the approved activity or project." Applicants are encouraged to factor likely cost increases into their proposal and cost categories instead of as a separate contingency line. However, note that funds cannot be placed in a "contingency reserve" or similar account. All costs must meet federal requirements for being allowable, allocable, and reasonable, as defined in 2 CFR 200 (see, e.g., 2 CFR 200.403 (allowable), 2 CFR 200.404	July 17, 2025/BEAD 2.0 V.1

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		(reasonable), and 2 CFR 200.405 (allocable)). In subgrants administered as fixed amount subawards, where reimbursements are milestone-based and not cost-based, subgrantees cannot alter the subgrant award amount, regardless of cost increases, decreases, or contingencies.	
23.	What costs does the CPUC define as administrative, and is there a cap on these costs?	There is no line item for administrative costs in the budget template or in financial reporting for the BEAD Program. The total bid price should be inclusive of administrative costs related to project deployment. Applicants' administrative costs, including project management, permitting, and other tasks related to deployment, should fall within other cost categories in the budget as they are considered part of routine project execution for deployment.	July 17, 2025/BEAD 2.0 V.1
24.	What are the consequences of requesting a match waiver on my application?	Per the NTIA BEAD Restructuring Policy Notice (RPN), the BEAD primary scoring criteria will be lowest project cost to the BEAD program in an applicant's project proposal. A BEAD match waiver (if approved or denied by NTIA) will affect an applicant's cost per project proposal. It is up to the applicant and their respective business case for each project proposal to determine which combination of factors (match amount, match waiver, cost per BSL, inclusion of high cost BSLs, etc.) provides the most competitive cost per project proposal. Applications requesting match waivers in areas with no other suitable applications will be considered. Furthermore, certain census block groups are exempt from the match requirement if they are NTIA-designated high-cost areas and will therefore decrease the minimum match requirement for a project that includes such areas. While NTIA has stated that match waivers will be granted "only in special circumstances," the CPUC will include the match waiver and justification in its Final Proposal to NTIA if the project is selected by the CPUC (NOFO, p. 22).	July 17, 2025/BEAD 2.0 V.1
25.	Can applicants adjust the CPUC-provided Letter of Commitment to match their financial institution's requirements and submit a new letter from a different institution later?	Applicants may submit a letter with an adjusted format as long as it contains equivalent information and fulfills the following requirements: the letter must be from a qualified financial institution confirming the commitment to issue an irrevocable standby letter of credit. It must describe the type of financial institution using the categories in 47 C.F.R. § 54.804(c)(2) or confirm that the institution is a qualifying credit union that is (a) insured by the National Credit Union Administration and (b) has a credit union safety rating	July 17, 2025/BEAD 2.0 V.1

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		issued by Weiss of B− or better. The letter must specify a dollar value and cannot include qualifications on the commitment. A replacement letter may be submitted later as long as the institution meets the relevant requirements, and the applicant seeks approval from the CPUC.	
26.	Does the BEAD program provide established cost structures for middle mile connections that applicants can use in their financial models?	No. The CPUC has not provided defined cost structures for middle mile connections under the BEAD program. Applicants are responsible for estimating these costs as part of their BEAD application financial models.	July 17, 2025/BEAD 2.0 V.1
27.	Is it possible to transfer a letter of credit (LOC) or bond requirement to another entity post-award?	Yes. The LOC or bond requirement may be transferred to another entity post-award, provided that the new letter of credit or bond meets the same standard as the original and the subrecipient obtains approval from the CPUC, subject to CPUC's risk assessment and approval processes.	July 17, 2025/BEAD 2.0 V.1
28.	In reference to Question 11.24B, is a bankruptcy review required for the Letter of Credit (LOC) pre-award or post-award?	In the application, a signed bankruptcy opinion letter from legal counsel licensed in California that states the letter of credit (LOC) is drafted in such a way that, under a Title 11 bankruptcy proceeding, the bankruptcy court will not treat the LOC or proceeds from the LOC as "property" of the subgrantee's bankruptcy estate under Section 541 of the United States Bankruptcy Code (Title 11) is required in question 11.24B for entities that selected "Letter of Credit" in question 11.24. If the financial institution has a standard letter of credit it uses and/or follows the template, legal counsel can be from the financial institution or from applicant and qualify that the opinion is based on a review of the standard/template provided and attach it to the opinion. Otherwise, the applicant can upload a PDF that explains that the financial institution declines to make a legal opinion available in the absence of the actual letter of credit, but the applicant commits to securing a legal opinion of the executed letter of credit and providing it with its submission of the LOC. A bankruptcy opinion letter is not required for applicants that opt to submit a performance bond. See IPv2 pp. 59-60 for more details.	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		The letter of commitment is still required for applicants that will be supplying a letter of credit, as described in questions 11.24 and 11.24A in the Project Application.	
29.	Is there flexibility in the Letter of Credit (LOC) or bond requirement that would allow an entity with significant liquid assets to bypass it?	The Letter of Credit (LOC) and performance bond requirements are outlined in IPv2. See Section 5.12.1.2 of IPv2 and NTIA's Letter of Credit Waiver for information about the options available to prospective subgrantees.	July 17, 2025/BEAD 2.0 V.1
30.	Where does the bankruptcy opinion for a letter of credit need to come from?	The bankruptcy opinion letter must come from legal counsel licensed in the state of California.	July 17, 2025/BEAD 2.0 V.1
31.	Regarding the BEAD match waiver process, is approval before the application window closes, and does the map show which unserved and underserved locations are considered high-cost for the purposes of automatic match reduction?	No, the match waiver does not have to be approved before the application window closes. The match waiver request will be reviewed by CPUC and, if the project is preliminarily awarded, will be submitted to NTIA for final approval as a part of the Final Proposal. The PAU mapping tool in the application portal includes a layer for NTIA-designated high-cost areas.	July 17, 2025/BEAD 2.0 V.1
32.	Can the costs of power generation or storage be included as eligible expenses in a BEAD application for off-grid locations that require electrification to support broadband deployment?	Yes. Costs to enable power service at a new structure necessary for broadband deployment are eligible. However, operational costs (e.g. electric bills) are not eligible.	July 17, 2025/BEAD 2.0 V.1
33.	Can existing infrastructure funded by the Universal Service Fund (USF) be used as an in-kind match for a BEAD project?	No, existing infrastructure funded by the Universal Services Fund (USF) may not be used as an in-kind match for BEAD projects. Per the BEAD NOFO, "Except as expressly provided for in the Infrastructure Act, funds from other Federal programs (including funds from the Commission's Universal Service Fund programs) may not be used as matching funds. The Infrastructure Act expressly provides that matching funds for the BEAD Program may come from a federal regional commission or authority and from funds that were provided to an Eligible Entity or a subgrantee for the purpose of deploying broadband service under the Families First Coronavirus Response Act (Public Law 116-127; 134 Stat. 178); the CARES Act (Public Law 116-136; 134 Stat. 281); the Consolidated Appropriations Act, 2021 (Public Law 116-260; 134 Stat. 1182); or the American Rescue Plan Act of 2021 (Public Law 117-2; 135 Stat.	July 17, 2025/BEAD 2.0 V.1

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		4), to the extent permitted by those laws" (p. 21, NOFO).	
34.	In relation to BEAD-funded infrastructure, when does year one begin – from the day funding is received through construction plus five years of M&O support, with the balance extending to the tenth year, or from the end of construction?	The ten years of the pro forma begin with the first fiscal year in which the project is officially awarded.	July 17, 2025/BEAD 2.0 V.1
35.	Does the pro forma only include revenue and expenses directly related to the proposed project, or can it include broader organizational operations?	Per the BEAD Subgrantee Qualifications - Evaluation Guide, pro forma statement estimates are intended to substantiate sustainability at the proposed project level only, not the broader organization. See BEAD Subgrantee Qualifications - Evaluation Guide Section 2.1.1, Sustainability/Pro Forma Analyses for more details.	July 17, 2025/BEAD 2.0 V.1
36.	Can applicants modify the pro forma or budget narrative templates?	No, applicants may not add rows, columns, or categories to the templates provided in the application.	July 17, 2025/BEAD 2.0 V.1
37.	Will BEAD support Operations and Maintenance past the 4-year buildout period of performance?	No, BEAD funding only covers network construction costs incurred within the designated four-year buildout period.	July 17, 2025/BEAD 2.0 V.1
38.	Are cash matches considered in-kind, and can they be provided after the 4-year buildout period of performance? For example, operational and maintenance costs (customer support, plant maintenance, billing systems, administrative costs)?	Cash matches are not considered in-kind contributions. All matching funds must be provided within the buildout period of performance. In general, matching funds should align with the timing of reimbursement requests.	July 17, 2025/BEAD 2.0 V.1
39.	If a surety bond is declined due to its size, is it permissible to split the bond amount into phases of the project and obtain multiple bonds, one for each phase?	Applicants may submit letters of the surety bond for the amounts the applicant can obtain at this time and would be able to accommodate. It is reasonable to have a letter from one or more institutions indicating the values they are willing to provide, given that the actual amount required will not be determined until selection. If necessary, the CPUC may issue a revision request. Applicants awarded funding must provide a performance bond after the preliminary award. There are alternatives available with a lower bond value, as	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		described in the letter of credit waiver from NTIA and as outlined in the CPUC's IPv2 pp. 57-61.	
40.	Is the 2% administrative cap based on the grant total or the total project cost? How does that fit into the Project Costs Template and financial reporting?	The 2% administrative cap applies to BEAD funds allocated to the State for administrative expenses. These include NTIA oversight, staffing, travel, policy development, staff training, and ongoing stakeholder engagement related to the State's administration of the BEAD program. For applicants, project management and administrative costs are eligible under BEAD. The Project Costs Template in Question 5.8 defines the "Planning/Project Management" budget category as costs "pertaining to the management of the Applicant's internal staff or third-party contractors. Items could include but are not limited to; internal project management hours, legal counsel obtained by the applicant for purposes of the proposed project, and administrative staff hours associated with grant compliance."	July 17, 2025/BEAD 2.0 V.1
41.	Can you please confirm if the audited financial statements are required during the application phase? If so, how do we submit our audited financial statements?	Audited financial statements are required during the application phase and must be submitted by August 2, 2025 at 6 pm. PT. If an applicant cannot submit audited financial statements during the application phase, it must: • Explain why audited financials are unavailable. • Provide financial statements from the prior fiscal year with equivalent detail, and • Certify that it will submit audited financials within 12 weeks of applying. The final date of audited financial statement submission is 12 weeks from the close of the application period, August 2, 2025 (6pm Pacific Time) Note that the NTIA BEAD Restructuring Policy Notice updated the requirements for financial statements for low-earth orbit (LEO) satellite providers. Per the Policy Notice, "NTIA encourages LEO providers to submit audited financial statements to NTIA demonstrating their financial capacity to undertake the commitments of a subgrantee in all areas in which the provider seeks to serve. NTIA, in turn, will work with the provider to develop a financial certification letter documenting the financial capability of the provider" (p. 21, Policy Notice).	July 22, 2025/BEAD 2.0 V.2

#	Questions	Answers	Date/Version
		Audited financial statements must be uploaded via the application portal. Additional guidance is available on the CPUC BEAD website.	
42.	Previous funding rounds allowed applicants to request a waiver for the 25% match requirement. Acknowledging that the updated scoring guidance on the basis of cost would be impacted by a reduction in match contribution as compared to other competitive applications for certain PAUs, does the revised Benefit of the Bargain application continue to allow for the possibility that some applicants may (1) request and (2) receive a waiver for the 25% match contribution?	Yes, applicants may request a match waiver during the Benefit of the Bargain round. However, NTIA will make the final determination whether the applicant's match waiver is approved or denied.	July 22, 2025/BEAD 2.0 V.2

Technical Capacity & Eligibility

#	Questions	Answers	Date/Version
1.	What are the conduit access point requirements?	The subgrantees are responsible for meeting the BEAD program requirements as stated in the Infrastructure Investment and Jobs Act (IIJA): "(D) for any project that involves laying fiber optic cables or conduit underground or along a roadway, shall include interspersed conduit access points at regular and short intervals;" (IIJA 47 U.S.C. § 1702(h)(4)(D)) Applicants will be asked to certify in the application that they will do so if applicable. Please refer to the NTIA Restructuring Policy Notice for more clarification on conduit access point requirements.	July 17, 2025/BEAD 2.0 V.1
2.	Do engineers need to be licensed to work in California for the BEAD program?	The certifying engineer must be a Professional Licensed Engineer with a "clear" status from any state or other eligible entity (See IPv2 p. 68).	July 17, 2025/BEAD 2.0 V.1
3.	Do the requirements for certifying operational capacity apply to the lead applicant or to the selected service providers? (Prequalification Application question 3.4)	Any member of a partnership contributing financial, technical, or operational capacity must submit a Prequalification Application. Within this application, each applicant must certify that they possess or will acquire the necessary operational expertise. Question 3.4bi requires applicants with less than two years of experience to explain how they will meet operational capacity requirements.	July 17, 2025/BEAD 2.0 V.1
4.	How will eligibility for low-cost service options be verified? Will tools be provided? (Application section 3.10)	Subgrantees are responsible for ensuring compliance with all requirements for the Low-Cost Service Option. All program elements are subject to audit, and providers must retain documentation sufficient to demonstrate compliance with current program rules. The CPUC may require additional information from applicants on the implementation of the low-cost service option during the compliance period.	July 17, 2025/BEAD 2.0 V.1
5.	How should an applicant determine which entity's status to use for the "Telephone Corporation" or "Non-Telephone Corporation" certifications if it could have applied as both a telecommunications and a non-telecommunications corporation (e.g., it is applying	If the lead applicant is a CPUC-regulated entity, it must provide a Certificate of Public Convenience and Necessity (CPCN). If the applicant is not CPUC-regulated, it should complete the "Non-Telephone Corporation" certification (Questions 2 through 4), even if it has subsidiaries that are telecommunications corporations.	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
	as a non-telephone corporation parent company with a subsidiary that is a telecommunications corporation)?		
6.	Does a Wireless Internet Service Provider (WISP) need to have a North American Numbering Plan Administration (NANPA) Carrier Identification Code (CIC) number to apply for and receive BEAD funding?	No, a NANPA Carrier Identification Code (CIC) is not required to apply for BEAD funding. However, applicants must provide a Unique Entity Identifier (UEI) associated with an active registration in SAM.gov. For more information, please refer to Question #2 under the "Roles & Participation" section in the FAQ.	July 17, 2025/BEAD 2.0 V.1
7.	Regarding BEAD compliance, does the CPUC define "useful life" based on the 10-year Federal Interest Period following subgrant closeout, or will asset-specific useful life durations outlined in NTIA's Useful Life Fact Sheet be applied?	The federal interest in assets acquired with BEAD project funds terminates after the ten-year federal interest period, beginning after the subgrant closeout, regardless of the asset's useful life. Once this period ends, subgrantee may dispose of, sell or manage the assets at their discretion. Assets with a shorter useful life than the federal interest period are subject to specific rules regarding disposal and replacement. In December 2023, the NTIA issued *Tailoring the Application of the Uniform Guidance to the BEAD Program*, which includes two documents: • Official Notice • Explainer Document The Notice states: "The Federal interest in all real property or equipment acquired or improved as part of a subgrant for which the major purpose is a broadband infrastructure project will continue for 10 years after the year in which the subgrant for a project has been closed out in accordance with 2 CFR 200.344. For example, for all subgrants closed out in 2027, regardless of the month, the Federal Interest Period will last until December 31, 2037." However, the NTIA operates under the U.S. Department of Commerce, whose Financial Assistance General Terms and Conditions (updated in September 2024) clarify that, under 2 CFR 200.316, property, equipment, and intangible property are held in trust for program beneficiaries. Per Section C.02 (p.17) of the DOC Terms: "This trust relationship exists throughout the duration of the property's estimated useful life, as determined by the Grants Officer in consultation with the Program	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		Office, during which time the Federal Government retains an undivided, equitable reversionary interest in the property (Federal Interest)." During this trust period, the rules outlined in 2 CFR 200.310 through 2 CFR 200.316 apply, subject to the modifications outlined in the NTIA Notice. Please note that this reflects current NTIA guidance, which is subject to change.	
8.	Does the obligation to offer the Low-Cost Service Option extend only through the ten-year federal interest period following subgrant closeout, rather than the full lifespan of the infrastructure?	Yes, the requirement to offer a Low-Cost Service Option for qualifying households applies for the ten-year federal interest period following subgrant closeout. See Question 9 in this section of the FAQ for additional information on the federal interest period.	July 17, 2025/BEAD 2.0 V.1
9.	In reference to Question 5.3C, how should applicants respond when they have backup power but do not have network redundancy, given that the question requires a yes/no answer?	Question 5.3C asks whether both backup power and network redundancy are utilized. If an applicant has one but not the other, they should answer "No" in question 5.3C.	July 17, 2025/BEAD 2.0 V.1
10.	What types of costs should applicants include in their financial model for connecting middle-mile network infrastructure? For example, point-to-point lit service with minimum of 20Gb connectivity and short-range dark fiber connectivity (usually under 30 miles).	Both options are eligible if they meet BEAD requirements from 2 CFR 200. The lease term for the middle-mile infrastructure must be at least one year.	July 17, 2025/BEAD 2.0 V.1
11.	Regarding Question 3.5 of the BEAD application, how should fixed wireless providers report route mileage metrics?	For wireless projects, applicants should only include route mileage for new cables it proposes to build to new towers. Applicants should not include the distances of any wireless connections for Question 3.5.	July 17, 2025/BEAD 2.0 V.1

Compliance with Labor Laws

#	Questions	Answers	Date/Version
1.	What are the BEAD labor laws and how will they be operationalized?	The NTIA Restructuring Policy Notice (RPN) has modified the labor law requirements for applicants. The RPN states that applicants are required to certify compliance with all federal labor and employment laws. For more information, please refer to the NTIA RPN.	July 17, 2025/BEAD 2.0 V.1
2.	Who is responsible for providing certifications of compliance with labor practices?	The authorized certifying official of the applicant is responsible for certifying compliance with labor practices.	July 17, 2025/BEAD 2.0 V.1

Legal Compliance

#	Questions	Answers	Date/Version
1.	What are the consequences of not meeting deployment milestones or other requirements in the BEAD program?	According to CPUCs Initial Proposal volume 2 (IPv2), Section 17.2.5, the CPUC will include claw back provisions in its grant agreements. If a subgrantee fails to meet its obligations – such as those outlined in the application – the CPUC may: ▪ Deny reimbursement requests ▪ Require partial or full forfeiture of BEAD funds ▪ Impose financial penalties for fraud, misconduct, or non-performance. The CPUC defines performance as including: ▪ Timely and effective broadband deployment ▪ Maintaining low-cost service options for the useful life of the assets ▪ Meeting reporting deadlines and providing accurate deployment data ▪ Complying with all BEAD program requirements, including broadband speed commitments.	July 17, 2025/BEAD 2.0 V.1
2.	What is the CEQA exemption process for those using existing infrastructure?	Projects involving installation of new fiber in existing conduit or on existing support structures, and many similar minor construction actions that do not involve the potential to impact sensitive environmental resources may qualify for a Class 1, 2, 3, or 4 CEQA Categorical Exemption under CEQA Guidelines Sections 15301-15304. However, applicants must ensure their project is not subject to exceptions under Section 15300.2 of the CEQA Guidelines. In the BEAD Project Application, question 5.28 and question 5.28A ask applicants whether they wish to apply for a Categorical Exclusion and the citations needed to qualify for one. For more details, refer to the CEQA Guidelines - CEQA Title 14.	July 17, 2025/BEAD 2.0 V.1
3.	For question 5.19A in the Project Application, is a general approach to NHPA mitigation sufficient, or must individual locations be addressed?	For the purposes of the BEAD Project Application, a general approach to evaluating and/or avoiding effects on historic properties in accordance with applicable federal and state regulations—such as the National Historic Preservation Act (NHPA)—is sufficient. This response is specific to the BEAD application process and does not address or imply sufficiency for compliance with other requirements, including the California Environmental Quality Act (CEQA).	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
4.	How would CPUC handle a project if it was submitted as an underground fiber project but then, during design, must be constructed using aerial fiber?	An applicant proposing any changes to project design will be required to notify CPUC and may need additional CPUC approval, depending on the extent and timing of the change. Changes to project design are likely to impact several aspects of the project and possibly require reassessment of the following, including: • Permitting • Budgeting • Environmental consultation processes Changes to the above aspects would all impact the timeline of the project. Due to the impacts of design changes on a project, it is important that applicants submit a well-considered, practical, and implementable design certified by a Professional Engineer in the Project Application. The CPUC expects modest changes to be necessary as detailed engineering, permit outcomes, and field-related discoveries necessitate such adjustments and will work with the subgrantee to identify any updates to provided documentation and maintain project viability. However, it is permissible to change construction methods after initial Project Application submission as long as the technology type, certifications, and performance commitments remain the same, and as long as the subgrantee notifies the CPUC and receives any required approvals. The BEAD program considers underground installed fiber or aerially installed fiber as "end-to-end fiber".	July 17, 2025/BEAD 2.0 V.1
5.	Can you confirm whether our commitment to complete the proposed buildout becomes binding only upon execution of the subgrant agreement - not at the time of award notification? Additionally, what, if any, penalties or consequences would apply if a material change were to occur after an award is issued but before a subgrant agreement is signed, and we ultimately are unable to accept the funding?	The subgrantee's commitment to complete the proposed buildout becomes binding at the approval of the Final Proposal by the NTIA. Any changes to the BEAD program from NTIA will be relayed to the subgrantees and the CPUC will adjust its timeline and processes accordingly.	July 17, 2025/BEAD 2.0 V.1

Supply Chain Compliance

#	Questions	Answers	Date/Version
1.	What are the key grant application requirements for construction and material sourcing?	A detailed overview of the Subgrantee Selection Process application requirements is available in Section 5.3 of the CPUC's Initial Proposal volume 2 (IPv2). The National Telecommunications and Information Administration (NTIA)'s BEAD Subgrantee Qualifications Evaluation Guide provides further guidance. The CPUC offers training and technical support for the Subgrantee Selection Process, accessible on the CPUC BEAD Program website and BEAD Events page. CPUC BEAD 2.0 application materials have also now been posted on the CPUC BEAD program website. The CPUC BEAD program follows NTIA construction sourcing guidance of Build America, Buy America (BABA) restrictions on purchases of fiber equipment and the federal Secure and Trusted Communications Networks Act of 2019. BABA, established under the Infrastructure Investment and Jobs Act (IIJA), requires federally funded infrastructure projects to prioritize U.S.-manufactured materials, including: • Construction materials, iron, steel, manufactured products, and electronics. • Compliance with BABA for all BEAD-funded projects. • Potential federal agencies waivers for certain BABA requirements. NTIA has issued a limited waiver for some BABA provisions under BEAD but maintains many domestic sourcing requirements. For more detail, refer to the NTIA Build America, Buy America Compliance and Documentation Requirements and Procedures guidance.	July 17, 2025/BEAD 2.0 V.1
2.	What does the "certification of compliance with legal and program requirements including Build America, Buy America (BABA), environmental and historic preservation, and FCC regulations" in the application checklist mean? How does an applicant certify compliance?	The authorized certifying official of the applicant is responsible for certifying compliance with BABA, EHP, and other regulations. While additional processes involving third parties and/or agencies may be required post-award, the prequalification certification requires the authorized certifying official to attest to a commitment to compliance.	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
3.	Does an ISP need to comply with Build America, Buy America (BABA) across all its projects and operations, or only for BEAD-funded projects?	Build America, Buy America (BABA) compliance only applies to the BEAD funded project. For example, any in-kind match or equipment purchased for the BEAD project must comply with BABA. However, an ISP's existing infrastructure that is not used for the proposed BEAD project or as an in-kind match does not need to comply with BABA.	July 17, 2025/BEAD 2.0 V.1

Roles & Participation Guidelines

#	Questions	Answers	Date/Version
1.	It sounds like grantees must be internet service providers. Will there be opportunity for fiber construction companies to apply who do not provide residential service?	Subgrantees can be any type of entity, including public entities, Tribal entities, utilities, co-ops, non-profits, internet service providers, new entrants, and others. A fiber construction company can partner with an internet service provider to fulfill BEAD requirements but cannot apply on their own. The applicant will be evaluated based on operational history and ability to meet BEAD requirements and will certify that it will meet BEAD operational service and performance standards. If the applicant is not itself the service provider and is awarded the subgrant, it will be responsible for meeting all the requirements through its identified partners. Applicants are encouraged to reference the Initial Proposal volume 2 (IPv2) Section 5.1.1 and the National Telecommunications and Information Administration (NTIA) Notice of Funding Opportunity (NOFO) for more information.	July 17, 2025/BEAD 2.0 V.1
2.	We have two entities. One is a telecom engineering and construction company that does not own or operate any of the infrastructure that it builds, nor does it have any subscribers. However, the same group also owns a small WISP. The WISP has over a decade of operating experience but would struggle to meet some of the financial obligations independently. It is registered with the FCC, owns and operates telecom infrastructure, and services subscribers. Which entity should apply for funding?	The CPUC cannot indicate which entity should apply or which entity would have a better chance of receiving funding were it to apply. Subgrantees can be any type of entity, including public entities, Tribal entities, utilities, co-ops, non-profits, internet service providers, new entrants, and others. Any applicant who is willing and able to construct, operate, and provide end-user service in accordance with the BEAD Program requirements can be considered for subgrantee award. Per BEAD requirements, applicants must demonstrate their operational, managerial, financial, and technical capability in the application in order to be considered a qualified applicant. The applicant may - through its partnerships - demonstrate a history of last-mile operational service, but it is the lead applicant that will be responsible for ensuring its commitments and make its certifications. A detailed overview of the Subgrantee Selection Process is provided in the CPUC's Initial Proposal version 2 (IPv2), available on the CPUC BEAD Program website. Additionally, the National Telecommunications and Information Administration (NTIA)'s BEAD Subgrantee Qualifications Evaluation Guide offers guidance on scoring and selection criteria for subgrantees. More	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		information is available on the NTIA website. The CPUC also offers training and technical support for the Subgrantee Selection Process, accessible on its BEAD Program website.	
3.	Are there specific rules for bidding in partnerships?	Yes, the lead applicant must make all commitments and certifications in the application. BEAD Program requirements apply to both the lead applicant and its partners. Additionally, partnerships must be exclusive within the BEAD grant opportunity to prevent conflicts of interest and collusion. This means: ▪ A partner cannot participate in multiple partnerships. ▪ A partner cannot provide more than one proposal for overlapping areas, whether independently or with a partner.	July 17, 2025/BEAD 2.0 V.1
4.	How can an applicant submit Prequalification documents if they do not currently possess a CPUC license but plan to partner with a CPUC-certified entity to move forward in the BEAD process?	If a CPCN is not applicable for your organization, enter "0" for the CPCN license number. If your organization has a partner with the required certifications, **your CPUC-certified partner must submit a Prequalification Application and indicate its certifications**.	July 17, 2025/BEAD 2.0 V.1
5.	Do ownership and partnership disclosure requirements apply to governmental entities during pre-qualifications, and can they include their ISP partners in the response? (Application question 4.6C)	Yes. All applicants must upload a completed "Ownership Information" template as well as any other descriptions or uploads to fulfill the ownership and partnership disclosure requirements. Government entities should leave fields blank or write "Not applicable" for sections that do not apply. In some cases, that may mean the entire form. ISP partners may be included in the response, where relevant. See Ownership Information Template.	July 17, 2025/BEAD 2.0 V.1
6.	Is the Ownership Information template relevant for government entities? Do applicants need to disclose the final ownership of broadband infrastructure upon project completion, and how should governmental entities provide this information? (Application question 4.6)	Yes. The Ownership Information template is designed to capture the ownership status of the applicant. Government entities must still submit the Ownership Information Template, completing only applicable sections. It is assumed that the applicant will retain ownership of the broadband infrastructure unless otherwise specified. If ownership will transfer, the applicant must identify the future owner, who will be subject to all BEAD requirements and must certify as such in the application and be listed as a partner in the "Partners" template alongside a description specifying that the entity will own the infrastructure.	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
7.	How can municipalities meet certification requirements in the Prequalification Application when certain certifications only apply to ISP partners? Our municipality does not provide broadband directly to customers and does not have a pre-existing partnership, so we cannot certify some statements without relying on the ISP's experience.	A municipality should complete the Prequalification Application to the best of its ability. Certifications apply only to the entity completing the Prequalification – the municipality certifies for itself, not for any planned partner. The municipality may describe its anticipated partner where appropriate, such as in Questions 3.4Bi or 3.4E. If the municipality plans to partner with an ISP to build and/or operate the network, the ISP must also submit its own Prequalification Application. Question 3.4B is only required if the applicant certifies in Question 3.4A that it has at least two years of experience providing voice, broadband, or electric transmission or distribution service. If the applicant does not meet the two-year experience requirement, it must instead submit a narrative "demonstrating that the applicant has obtained, through internal or external resources, sufficient operational capabilities to successfully complete and operate a BEAD-funded project in compliance with program requirements." This narrative may include a description of the planned ISP partner.	July 17, 2025/BEAD 2.0 V.1
8.	For local governments partnering with an ISP that will serve as the formal applicant for BEAD funding, how should the local government respond to application questions found in Sections 3-7 that request information on certifications, compliance history, safety procedures, wage practices, CTO qualifications, and ownership disclosures, which appear to apply only to the ISP?	If the ISP will serve as the lead applicant, it must submit a Prequalification Application with the required certifications and commitments. If the local government partner is providing financial, operational, or technical capacity to the project, it must also submit its own Prequalification Application with applicable certifications and commitments. In Section 3 - 7, when the application refers to the "applicant," it is referring to the entity submitting that specific Prequalification Application, not the eventual lead applicant for the project application. For example, if a local government partner completing Prequalification is asked to certify that it has no history of noncompliance with Environmental and Historic Preservation (EHP) requirements, the certification applies to only the local government's record. If the supporting local government (that is not the lead applicant) does not hold relevant businesses or technical certifications and licenses, it may upload a document stating "N/A". The ISP partner must separately certify to those requirements in its own Prequalification Application to be eligible to submit a Project Application as the lead applicant.	July 17, 2025/BEAD 2.0 V.1
9.	Can you clarify Table 1, Section 1 of the Ownership template, which asks for	For the Ownership Information template:	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
	"parties in interest in the applicant, including the identity and relationship of those persons or entities directly or indirectly owning or controlling the applicant," requires every shareholder of the corporation's stock to be listed, regardless of ownership size?	• Table 1.1 requires the applicant to "list the real party or parties in interest in the applicant or application, including a complete disclosure of the identity and relationship of those persons or entities directly or indirectly owning or controlling (or both) the applicant," • Table 1.2 requires the applicant to "list the name, address, and citizenship of any party holding 10 percent or more of stock in the applicant, whether voting or nonvoting, common or preferred, including the specific amount of the interest or percentage held." Neither table requires a full list of all shareholders. Shareholders with extremely small ownership stakes (below 10 percent) do not need to be included. • Table 1.1 requires information on real parties in interest that directly or indirectly own or control the applicant's organization. • Table 1.2 requires disclosure of parties holding 10 percent or more of stock in the applicant. For additional detail on ownership disclosures standards, see 47 CFR §1.2112(a)(1)).	
10.	If a local government applicant has not yet finalized selection of a partner due to their required RFP timeline, will they be limited to selecting partner ISPs who were approved for prequalification? What if they were approved through a PPP in a different locality?	If a local government has not finalized selection of a partner by the time they submit the Project Application, the application will likely be considered incomplete and ineligible, as critical elements of the application require information on technical and operational capacity and technical plans for the network. If a local government was not able to identify a partner in the Prequalification window but identify the partner by the end of the Project Application submission window, it can indicate its partner in the Partners Template and provide relevant information regarding the partner in relevant questions in the Project Application (for example, in the Organizational and Managerial Capacity section to upload information about the partner's experience). Documents attesting to the experience, qualifications, and capabilities of the partner may be accepted on this basis but are not guaranteed if the partner did not complete a Prequalification Application.	July 17, 2025/BEAD 2.0 V.1
11.	Should a prequalification application be resubmitted or	The applicant can proceed with their Project Application(s). Applicants cannot update or resubmit	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
	updated if a project partner is selected after submission?	the Prequalification Application unless prompted by a CPUC revision request. Additional partner information can be included in the Partners Template (Question 1.3B in the Project Application). Organizational, managerial, and financial updates can be added in Questions 6.1 and 7.1 of the Project Application.	
12.	If individual partners do not meet all qualifications in the prequalification, will that prevent them from passing, or can qualifications be attributed to the other partner?	Applicants should include as much information as possible in the Prequalification Application and can explain the qualifications and capacity that partners will provide in the relevant questions (for example, in 3.4Bi of the Prequalification Application). If an application requires revisions, the CPUC will send a revision request to the applicant.	July 17, 2025/BEAD 2.0 V.1

Post-Challenge Interactive Map

#	Questions	Answers	Date/Version
1.	What mapping tool will we use for qualified areas?	To view the final CPUC BEAD Map, review the map in the application portal and data files on the CPUC's website. The map is subject to revision and modification in order to capture state and federal enforceable commitments, and to align with NTIA reconciliation guidelines and NTIA Restructuring Policy Notice.	July 17, 2025/BEAD 2.0 V.1
2.	What should an applicant do if it identifies mistaken BSLs in its area that aren't inhabitable buildings but which are included as eligible BSLs in the CPUC's map? For example, if there is a haybale in a field or a condemned building that is identified as a BSL, how can an applicant identify that location for the CPUC?	Non-BSLs are locations which should not be served by the BEAD Program because they are not inhabitable buildings. Examples include silos, condemned buildings, rocks, or hay bales mistakenly identified in the Fabric as BSLs. Applicants can identify non-BSLs in their proposed project areas using the Locations List template in the Project Application. For those non-BSL locations in the Locations List template, select reason code 1 ("Location should not have broadband service") in the "zero_funding_reason" column. Then, select the relevant subcode in the "non_BSL_code" column, from the options below: • Subcode D: location has been demolished and is not expected to be rebuilt (e.g., destroyed by a natural disaster) • Subcode B: residential location is not habitable (e.g., a condemned building) • Subcode U: location is a support structure (e.g., a garage, parking structure, barn, silo, storage shed) • Subcode M: location is intended to be mobile (e.g., it is an RV or boat) • Subcode R: location is not a building but a land formation (e.g., a large rock or collection of hay bales) The application must submit evidence for the non-BSL in compliance with the "Instructions for Submitting No BEAD Locations Evidence" sheet which is linked in the Project Application. The applicant's identification of the non-BSL will be subject to CPUC and NTIA review and approval. Any upheld non-BSL challenge will remove this location from any BEAD award. Please see the following sources for more information: "Final Proposal (FP) Submission Requirements: Non-Service Codes," March 2025; "Final Proposal Guidance Version 1.2," January 2025.	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		Please see the following sources for more information: "Final Proposal (FP) Submission Requirements: Non-Service Codes," March 2025; "Final Proposal Guidance Version 1.2," January 2025, and "NTIA's Final Proposal Guidance" (June 25th, 2025).	
3.	What should an applicant do if the CPUC map does not take into account an enforceable commitment for locations in an applicant's project area? For example, if locations are now subject to an enforceable commitment from the last few months to serve some locations in a project area, how should the applicant identify those locations for CPUC?	The CPUC's data for eligible BEAD locations is based on the results from the BEAD Challenge Process and reflects enforceable commitments as of a specific point in time; • September 26, 2024, for state enforceable commitments; • October 1, 2024, for federal enforceable commitments. As such, new enforceable commitments may have been issued since the finalization of the data that are not reflected in the CPUC's map or list of eligible locations. Applicants can identify these new enforceable commitments in their proposed project areas using the **Locations List template** in the Project Application. Applicants should select **reason code 4** ("Location is already served by an enforceable commitment") in the "zero_funding_reason" column for those locations. The applicant must submit evidence for the location in compliance with the "Instructions for Submitting No BEAD Locations Evidence" sheet which is linked in the Project Application. The applicant must also indicate its evidence type in the Locations List and upload the evidence in the Project Application. The applicant's identification of the enforceable commitment will be subject to CPUC and NTIA review and approval. Any upheld enforceable commitment will remove this location from any BEAD award. Please see the following sources for more information: "Final Proposal (FP) Submission Requirements: Non-Service Codes," March 2025; "Final Proposal Guidance Version 1.2," January 2025, and "NTIA's Final Proposal Guidance" (June 25th, 2025).	July 17, 2025/BEAD 2.0 V.1
4.	What should an applicant do if the CPUC map identifies locations as eligible for BEAD funding but those locations have existing privately-funded service that means they're "served" by the BEAD	The CPUC's data for eligible BEAD locations is based on the results from the BEAD Challenge Process and reflects private build-out as of the conclusion of the Challenge Process and the version of the Fabric (12/31/2023) and National Broadband Map Availability data (5/14/2024) used in the Challenge Process. The post-challenge interactive map was	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
	program's definitions? For example, if a neighborhood has recently been built with fiber from an ISP and doesn't need to be served by BEAD, how should the applicant identify those locations for the CPUC?	published on February 7, 2025. As a result, some privately-funded networks may have been built that are not reflected in the CPUC's map or list of eligible locations. Applicants can identify locations served by their own privately-funded network in their proposed project areas using the Locations List template in the Project Application. The CPUC will only consider locations identified by BEAD applicants, provided they fall within the applicant's project area. Applicants should select reason code 5 ("Location is already served by nonsubsidized service (privately funded network)") in the "zero_funding_reason" column for those locations. The applicant must submit evidence for the location in compliance with the "Instructions for Submitting No BEAD Locations Evidence" sheet which is linked in the Project Application. This may include completing and uploading the "Network Diagram Officer Attestation Template." The applicant must also indicate its evidence type in the Locations List and upload the evidence in the Project Application. The applicant's identification of the service at that location will be subject to CPUC and NTIA review and approval. Any upheld privately-funded location will remove this location from any BEAD award. Please see the following sources for more information: "Final Proposal (FP) Submission Requirements: Non-Service Codes," March 2025; "Final Proposal Guidance Version 1.2," January 2025, and "NTIA's Final Proposal Guidance" (June 25th, 2025).	
5.	How will the CPUC update its data to make sure it's accurate before awards are made and approved by NTIA?	The CPUC will follow NTIA's Final Proposal Guidance, released on June 25th, 2025, or any subsequent guidance published prior to submission of the CPUC Final Proposal, to identify locations that should not receive BEAD funding and list them in the Final Proposal for NTIA approval. The CPUC will update its dataset to include new state and federal enforceable commitments, incorporate the most recent version of the FCC Fabric, and align itself to the NTIA Restructuring Policy Notice before the Final Proposal is submitted and before final awards are made. Final location adjustments based on applicant identifications of locations that should not receive BEAD funding will be subject to CPUC review and	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		approval and will occur before the Final Proposal is submitted and before final awards are made. For full guidance, please refer to NTIA's Final Proposal Guidance (June 25th, 2025). Note that final NTIA guidance on data reconciliation during Final Proposal is subject to change.	
6.	Can FFA grant recipients obtain and download the data that support the BEAD map for their grants? If so, what is the process?	The federal funding account awarded locations data are not available for download from the BEAD public map. If you have any questions regarding the FFA locations, please reach out to federalfundingaccount@cpuc.ca.gov.	July 17, 2025/BEAD 2.0 V.1
7.	We understand that the ULFW claims process could remove BSLs served by unlicensed fixed wireless providers who meet the technical requirements. Our specific question is: Will BSLs that have become served by copper DSL or licensed fixed wireless (LFW) providers offering 100/20 Mbps service—as reported in the December 31, 2024 BDC update—also be removed from the fundable BSL list? Or does the BSL removal process only apply to ULFW claims under Appendix A?	The NTIA BEAD Restructuring Policy Notice established the process by which the CPUC allowed Unlicensed Fixed Wireless (ULFW) providers to submit evidence that BEAD funding is not required for the locations they serve under the requirements specified in the Policy Notice. This process applied only to ULFW providers, not DSL or LFW providers. The date of the FCC Broadband Data Collection (BDC) data used has not changed from the previous round. The final list of locations, updated with the results of this process and other data updates mandated by NTIA, has been published on the CPUC's website and made available in the locations map in the application portal.	July 22, 2025/BEAD 2.0 V.2
8.	Will code 72 locations will be automatically removed from the eligible BSL list without requiring the claims process? We want to ensure all our locations are properly excluded from BEAD funding, regardless of whether they're reported as 70 or 72 in the BDC. Should we expect code 72 locations to be removed through the standard BSL update process?	The NTIA BEAD Restructuring Policy Notice established the process by which the CPUC allowed Unlicensed Fixed Wireless (ULFW) providers to submit evidence that BEAD funding is not required for the locations they serve under the requirements specified in the Policy Notice. This process applied only to providers with locations receiving code 70 ULFW service, and not licensed-by-rule code 72. In compliance with the Policy Notice, the data has also been updated by indicating federal and state enforceable commitments and removing locations that are not present in version 6 of the FCC Address Fabric. The date of the FCC Broadband Data Collection (BDC) data used has not changed from the previous round. Applicants still have an opportunity to claim locations as served through the BEAD Project Application process. Any applicant can request that locations be removed from BEAD funding by submitting a proposal (requesting $0 in funding) for locations that the applicant already serves. In the application, an applicant can identify locations that should be	July 22, 2025/BEAD 2.0 V.2

#	Questions	Answers	Date/Version
		ineligible for BEAD funding if the "location is already served by nonsubsidized service (privately funded network)" under NTIA's reason code 5 for removing a location from BEAD funding. This option is only for locations with qualifying broadband service in the current National Broadband Map. Evidence must unequivocally demonstrate that the location is already served with qualifying broadband (i.e., the location is currently connected or can be connected within 10 business days of a request with a standard installation fee). For evidence, the applicant would need to submit a subscription record for each location ID or a network diagram (including all locations) that shows adequate interconnection points and capacity to serve those locations, accompanied by an attestation from an officer of the company certifying the accuracy of the diagram and that your organization will not accept BEAD funding to serve the locations. This information is requested in questions 11.7, 11.8, 11.8A, and 11.9 in the Project Application and explained in the "Instructions for Submitting No BEAD Location Evidence." Please note: All applications represent a commitment to extend service under the terms of a BEAD subgrant. Should the minimal burden of evidence not be met for each included BSL, the applicant will be responsible for extending service to the BSLs that were not demonstrated to have existing service at BEAD performance level.	
9.	Will there be an opportunity for tribes or counties to challenge claimed ULFW-provided service?	The NTIA BEAD Restructuring Policy Notice established the process and requirements by which Unlicensed Fixed Wireless (ULFW) locations could be claimed as served. The Policy Notice only allowed ULFW providers to participate in the ULFW claims process. There is no separate challenge process for other entities.	July 22, 2025/BEAD 2.0 V.2
10.	When can we expect an updated map?	The datasets of eligible locations have been published on the CPUC website. The map in the application portal also contains the eligible locations for applicants' reference and inclusion.	July 22, 2025/BEAD 2.0 V.2

Application PAU Map

#	Questions	Answers	Date/Version
1.	There are two adjacent census block groups in our BEAD project area. One has been designated "High-Cost" and is exempt from matching funds. The other requires matching funds. What is the formula for assigning costs associated with installing a fiber backbone along the common road that will feed location drops and other roads? Are we free to assign all costs to the "High-Cost" CBG?	Costs are apportioned automatically based on the number of eligible BSLs in the Project Area Unit (CBG) against the total project cost for total project number of eligible BSLs. Applicants are encouraged to reference the Initial Proposal volume 2 (IPv2) and the National Telecommunications and Information Administration (NTIA) Notice of Funding Opportunity (NOFO) for more information.	July 17, 2025/BEAD 2.0 V.1
2.	How are PAUs compared in proposals if boundaries are determined by subgrantee proposals?	The subgrantee selection process is explained in Webinar 2 (Program Design) and Webinar 3 (Program Evaluation). (Note that some aspects of program design have changed; the webinar from July 11, 2025, includes some updates to the BEAD program.) Projects are only compared if they are in the same general project area; if so, they are ranked based on Priority or non-Priority status and score. This is how projects are compared and reviewed. NTIA Restructuring Policy Notice (RPN) has modified the primary and secondary scoring criteria, please refer to the RPN for more information about the changes in the scoring criteria	July 17, 2025/BEAD 2.0 V.1
3.	We are planning a project in a project area where we must construct fiber on sections of roads in neighboring PAUs to reach some of the locations in the project area. Is this acceptable under the grant rules, and are there any limits?	It is acceptable to build elements of infrastructure outside of the project area if it is necessary to serve locations in the project area. This should be shown in the project plan documents submitted as part of the application, which will be reviewed by the CPUC.	July 17, 2025/BEAD 2.0 V.1
4.	Are PAUs equivalent to CBGs, and can applicants aggregate adjacent PAUs into larger project areas? Can any CBGs contain overlapping Tribal areas?	Project Area Units (PAUs) are Census Block Groups (CBGs) or Tribal areas, with Tribal areas serving as the defining boundary where CBG and Tribal area boundaries differ. Applicants can aggregate adjacent PAUs to form a Project Area. When CBG and Tribal boundaries differ, the Tribal boundary defines the PAU. As a result, any CBGs that partially overlap with Tribal areas will be split: the entire Tribal area will be its own PAU, and the portion	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		of the CBG outside the Tribal area will be a separate PAU. The application portal will display all PAUs, including Tribal areas and partial CBGs that intersect with Tribal areas, with a dedicated Tribal area layer. For any applications that include projects on Tribal lands, a formal Resolution of Consent or other formal form of consent consistent with the applicable Tribe's governing structure from the applicable Tribal government must be submitted to the CPUC before funds may be formally committed. The CPUC strongly encourages applicants to meaningfully engage with the applicable Tribal governments in developing their applications where projects will be located on or near Tribal lands. In limited circumstances, the CPUC may consider and score an application for deployment on Tribal lands where no Resolution of Consent has yet been provided if substantial evidence of meaningful and sustained consultation with the Tribal government is provided, but a formal Resolution of Consent must be submitted in order to be formally awarded. For more details, please see the webinar on Project Area design and refer to Initial Proposal volume 2 (IPv2), p. 29, or the Decision, p. 47.	
5.	Will PAUs be released in a polygon-based format in addition to the unserved/underserved BSLs? If so, where can the PAU/CBG data be accessed?	The CPUC has released a shapefile download of all Project Area Units (PAU). PAUs remain the same as in the previous application round. Check the data download webpage regularly for availability.	July 17, 2025/BEAD 2.0 V.1
6.	Can an applicant submit an application for eligible locations surrounding a Tribal area, and how would it be scored?	A project area can contain any number of adjacent Project Area Units (PAU), which are Census Block Groups (CBG) or Tribal areas. Where there are Tribal boundaries that differ from CBG boundaries, the Tribal area is the PAU. As such, the Tribal area should be a PAU separate from the PAUs surrounding the Tribal area. If an applicant wants to submit an application for the PAUs surrounding a Tribal area, it is permitted to do so. All applications are scored using the same rubric, see the NTIA Restructuring Policy Notice for the updated scoring rubric. For any applications that include projects on Tribal lands, a formal Resolution of Consent or other formal form of consent consistent with the applicable Tribe's governing structure from the applicable Tribal government must be submitted to the CPUC before funds may be formally committed. The CPUC strongly encourages	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
		applicants to meaningfully engage with the applicable Tribal governments in developing their applications where projects will be located on or near Tribal lands. In limited circumstances, the CPUC may consider and score an application for deployment on Tribal lands where no Resolution of Consent has yet been provided if substantial evidence of meaningful and sustained consultation with the Tribal government is provided, but a formal Resolution of Consent must be submitted in order to be formally awarded.	
7.	Can an applicant be awarded only a portion of a proposed Project Area, with awarded areas no smaller than a Census Block Group? If so, could these awarded areas be non-contiguous?	Yes. CPUC's Initial Proposal volume 2 (IPv2), p. 55 states that, subject to the available timeline: • The CPUC may offer a reduced award to non-winning applicants for a smaller number of PAUs. • These offers will be made to the highest-scoring applicants first. • If an applicant declines, the CPUC may extend the offer to other applicants with proposals in nearby or adjacent PAUs. In addition, the CPUC may also, subject to available time: • Remove PAUs already awarded to another applicant. • Offer a reduced project area with a revised grant amount. • Award non-contiguous areas if necessary.	July 17, 2025/BEAD 2.0 V.1
8.	Will the CPUC finalize the Project Areas soon? Are significant changes expected?	The CPUC does not anticipate making changes to the Project Area Unit (PAU) map. PAUs are generally defined as Census Block Groups (CBGs), except for Tribal areas, which are designated as separate PAUs. However, Broadband Serviceable Location (BSL) eligibility may be updated during the subgrantee selection process to reflect state and federal enforceable commitments or align with NTIA reconciliation guidelines and the Restructuring Policy Notice. The PAU map available in the application portal displays the NTIA-approved post-Challenge Process results submitted in December 2024. For more details, please see the webinar on Project Area design available on the CPUC BEAD Events webpage.	July 17, 2025/BEAD 2.0 V.1
9.	How does the priority of serving unserved vs. underserved locations impact application competitiveness? If a PAU has a high number of underserved locations but	Applications are not prioritized or scored based on the proportion of unserved to underserved locations in a Project Area. As stated in the Initial Proposal Volume 2, the CPUC's program "seeks proposals for unserved and underserved locations collectively," (IPv2, p. 47). Applicants will be prioritized based on	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
	only a few unserved ones, would including it in an application reduce its competitiveness?	Priority or non-Priority status and score. For more information on the BEAD scoring rubric and prioritization, please refer to NTIA Restructuring Policy Notice.	
10.	Can you confirm that each applicant submits one prequalification but must file separate project applications for each non-contiguous area?	Yes. Each entity submits a single Prequalification Application and a separate Project Application for each Project Area it applies for. For example, an entity applying for three distinct Project Areas would submit one Prequalification Application and three Project Applications. The application platform will validate that your proposed Project Area follows contiguity rules. A Project Area must be contiguous but can contain connecting "empty" PAUs without eligible locations; in this way, two eligible PAUs can be connected via middle mile infrastructure in a PAU without eligible locations and still be considered contiguous. If an applicant chooses not to include a PAU to link two areas, the proposed area would be non-contiguous, requiring it to be split into two separate projects.	July 17, 2025/BEAD 2.0 V.1
11.	Is there a way for individuals assisting with a BEAD application to access the PAU map without formally applying for an area to help assess costs and feasibility?	Currently, the PAU map is available only through the CPUC BEAD Application portal. Prospective applicants can register as users and add other collaborators as needed. To register, visit https://register.bead.cpuc.ca.gov/register/bead. The CPUC will soon release a shapefile download of all Project Area Units (PAUs). Check the data download webpage regularly for availability.	July 17, 2025/BEAD 2.0 V.1
12.	For a Project Area, can we combine two Census Block Groups (CBGs) that have contiguous boundaries but are in two different counties?	Yes, applicants may combine any adjacent Project Area Units (PAUs), regardless of county boundaries. For more details, please see the webinar on Project Area design available on the CPUC BEAD Events webpage.	July 17, 2025/BEAD 2.0 V.1
13.	Can the same shapefile packages be used for multiple application questions with overlapping requirements, or do separate submissions need to be made for each question? (Application questions 5.3 and 5.15)	Yes. Applicants may upload the same shapefile as long as it contains all required information for both questions.	July 17, 2025/BEAD 2.0 V.1
14.	Is there a way to access detailed location data (including latitude and	Currently, only location IDs are available in a downloadable format. To obtain detailed data such as map coordinates or addresses, applicants must	July 17, 2025/BEAD 2.0 V.1

#	Questions	Answers	Date/Version
	longitude) for underserved and unserved areas?	use their existing fabric license or apply for one through the NTIA or CostQuest. Applicants can download the available CPUC BEAD map data from the CPUC BEAD Data Download webpage.	
15.	For an application with licensed fixed wireless deployment only, how does an applicant respond to question 5.15 in the Project Application?	Question 5.15 pertains to the environmental review of the project. Applicants must still provide a KMZ or shapefile of the project area in Question 5.15 and indicate in Question 5.15A that the project will not involve site disruption.	July 17, 2025/BEAD 2.0 V.1
16.	How can applicants determine if certain "Indicated Locations" on the BEAD map are eligible for BEAD funding if they may be funded by other enforceable commitments?	The "Indicated" file identifies locations that are likely to be funded by an enforceable commitment and are therefore unlikely to be funded by BEAD (a final determination regarding enforceable commitment locations is still pending). These locations are currently included in the BEAD eligibility list, as determined through the Challenge Process, but they are flagged to indicate that they will likely be removed from fundability before final awards are made. Please note that Indicated Locations are automatically excluded in the application portal.	July 17, 2025/BEAD 2.0 V.1 Updated July 22, 2025
17.	For PAUs where Broadband Data Collection (BDC) filings or enforceable commitments reduce eligible locations, should an application be submitted for only the excluded portion? For example, if an applicant expects 20% of locations in a project area unit to be removed due to an enforceable commitment, should it submit a BEAD application for just that 20% in order to make sure that the locations will in fact be removed?	The CPUC cannot advise on what Project Area Units (PAUs) an applicant should include or exclude. However, applicants must submit a proposal with a minimum threshold of 60% of eligible and fundable locations, and does not include indicated locations, which are automatically excluded in the application platform.	July 17, 2025/BEAD 2.0 V.1
25.	Is there a limit to the number of PAUs an applicant can apply to in their project area application?	Yes. Each Project Applications may include up to 850 PAUs. If an applicant wishes to include more, they must submit multiple applications. Note: ▪ An applicant cannot submit more than one competing application for a given PAU or	July 22, 2025/BEAD 2.0 V.2

#	Questions	Answers	Date/Version
		location; for example, if an applicant is submitting multiple Priority applications, the proposals must be for completely different PAUs and locations. ▪ This applies to both Priority Broadband Projects and Non-Priority Broadband Projects. Uploading 350 or more PAUs may result in delays of up to five minutes, depending internet connection speed.	