

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

Subgrantee Selection Process Frequently Asked Questions

April 29, 2025
Version 9.0



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 \(NOFO\)](#), and [Decision Approving Volume Two of the Broadband Equity, Access, and Deployment Program Rules](#). **It does not alter or override** the provisions of the approved IPv2, NOFO, or Decision Approving Volume Two of the Broadband Equity, Access, and Deployment Program Rules. 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.

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Program Overview and Key Definitions

#	Questions	Answers	Date/Version
1.	Could you provide an overview of the BEAD program?	<p>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. The presentation materials are available here, and the webinar recording can be accessed here.</p> <p>The CPUC provides Subgrantee Selection Process training and technical support, which can be found on the CPUC BEAD Program website. Additional resources are also available here, which has an initial application checklist to help applicants prepare for Prequalification and Application phases, specifically noting items that may take longer to obtain or prepare.</p>	Feb 11, 2025/V. 1.0
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 implementation steps unique to the state.	Feb 11, 2025/V. 1.0
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 . The CPUC is currently developing Application materials, please check the CPUC BEAD Program website regularly for updates. Additional resources are also available at the CPUC BEAD Resources webpage .	Feb 11, 2025/V. 1.0
4.	Will the EHCPLT be the same across the whole state or vary by area?	The Extremely High Cost Per Location Threshold will vary by area. It can be considered an "area budget" that determines whether proposals in a particular area are within reasonable costs to be awarded given the CPUC's overall allocated funds across the state. See CPUC's Initial Proposal volume 2 (IPv2) Sections 5.10 and 5.11 for more information.	Feb 11, 2025/V. 1.0
5.	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 100 percent of both unserved and underserved locations using the technology of the applicant's choice. Consistent with the NOFO, the CPUC will prioritize certain technologies in its selection process. See Initial Proposal volume 2 Sections 5.1.3, 5.4, and 5.7 for more details.	Feb 11, 2025/V. 1.0

6.	How will the EHCPLT be calculated? How will the "budget" approach to BEAD allocation be implemented?	The EHCPLT will be calculated based on a variety of data, including proposed costs in BEAD applications for each area (among other data sources). It can be considered an 'area budget' that determines whether proposals in a particular area are within reasonable costs to be awarded given the CPUC's overall allocated funds across the state. See CPUC's Initial Proposal volume 2 (IPv2) Sections 5.10 and 5.11 for more information.	Feb 11, 2025/V. 1.0
7.	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?	All applicants will apply for BEAD within the same application window regardless of proposed technology. Fiber applications will be accepted at the same time as hybrid fiber-coax, fixed wireless, and alternative technology applications. Among all applications submitted in the application window, end-to-end fiber proposals are defined as "Priority Broadband Projects" and will be ranked above other technology proposals. The CPUC may, depending on the outcome of the received applications, conduct a second round to target areas that did not receive feasible proposals. See CPUC's Initial Proposal volume 2 (IPv2) Sections 5.1.3, 5.1.4, and 5.11 for more details.	Feb 11, 2025/V. 1.0
8.	Why is the CPUC making BEAD a budget driven program which will impact how technology is chosen?	<p>The CPUC's plan for how to award BEAD funds is determined by federal requirements based on provisions of the law that funded BEAD and consideration of guidance provided by National Telecommunications and Information Administration (NTIA). The CPUC's proposed strategy is thus required to fit within the federal parameters. See NTIA's Notice of Funding Opportunity (NOFO) Page 42-46 for information.</p> <p>NTIA's guidance will determine the type of technology (Reliable Broadband Service, Alternative Technologies) chosen. NTIA has determined that "Priority Broadband Projects" are those that use end-to-end fiber-optic architecture and will command the highest degree of priority. This is followed by "Qualifying Broadband" consisting of HFC, DSL, and LFW, and then "Alternative Technologies" consisting of ULFW and LEOs. See NTIA's Reliable Broadband Service & Alternative Technologies Guidance for more information</p> <p>The CPUC hosted a webinar on BEAD Program Design - Project Areas, Negotiations, & Selection on December 10, 2024. The presentation materials are available here, and the webinar recording can be accessed here.</p>	Feb 11, 2025/V. 1.0
9.	Do you anticipate pausing or extending the state's BEAD deadlines as well?	The CPUC has announced the timeline for the Broadband Equity, Access, and Deployment (BEAD) program rollout, which is driven by NTIA requirements. Please note that the BEAD program timeline remains provisional and subject to modification. Any changes to the CPUC BEAD Timeline will be communicated to applicants, please check the CPUC	Feb 11, 2025/V. 1.0 Updated Apr 24, 2025

		<p>BEAD Subgrantee Selection Process webpage regularly for updates.</p> <p>To view the CPUC BEAD Timeline, visit the CPUC BEAD Program website.</p>	
10.	How do you rate applications proposing wireless technology?	<p>National Telecommunications and Information Administration (NTIA) guidance will determine how wireless technology is rated. NTIA has determined that "Priority Broadband Projects" are those that use end-to-end fiber-optic architecture and will command the highest degree of priority. This is followed by "Qualifying Broadband" consisting of HFC, DSL, and LFW, and then "Alternative Technologies" consisting of ULFW and LEOs. See NTIA's Reliable Broadband Service & Alternative Technologies Guidance for more information.</p> <p>The scoring rubric for licensed fixed wireless and unlicensed fixed wireless projects is found in the CPUC's Initial Proposal volume 2 (IPv2) under Section 5.3.3, available for download on the CPUC BEAD Program website.</p> <p>The CPUC also provides training and technical support on the Subgrantee Selection Process, which can be accessed through the CPUC BEAD Program website. Presentation materials and video recordings can be found on the CPUC BEAD Events page.</p>	Feb 11, 2025/V. 1.0
11.	Is it possible to break up CBGs if they are very large? Given the size of some of them and requirements to cross very rough terrain would make it very costly to run fiber.	<p>Large Census Block Groups (CBG) will not be broken up. More information about Project Area definitions can be found in the Section 5.7 of the CPUC's Initial Proposal volume 2 (IPv2). For more information about the BEAD Subgrantee Selection Process scoring criteria and selection process, please refer to Section 5.1.3, 5.3, 5.8, 5.10, and 5.11. The CPUC hosted a webinar on BEAD Subgrantee Selection Process on December 3, 2024. The presentation materials and webinar recording can be accessed here and here.</p>	Feb 11, 2025/V. 1.0
12.	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)?	<p>Cost per BSL is not a direct scoring factor for the CPUC. However, the "Minimum BEAD Outlay" score is based on the match offered relative to funding request, creating an indirect relationship to per-location costs. While overall project cost and cost per BSL are not explicitly part of the scoring rubric, the CPUC has implemented processes to maximize the use of BEAD funds to achieve the program's goal of serving 100 percent of unserved and underserved locations in California.</p> <p>To ensure effective use of BEAD funds and serve as many locations as possible, applications that exceed the area budget or the Extremely High Cost Per Location Threshold may not be considered. Applications will be ranked</p>	Feb 11, 2025/V. 1.0

		<p>based on their score and technology type, with the highest-ranking application that fits within the CPUC's budget for the State and project area receiving provisional approval.</p> <p>Additionally, the NTIA requires California's final proposal to balance the twin policy goals of providing broadband to every unserved and underserved location while staying within the State's BEAD allocation. As a result, not all applications may receive funding.</p> <p>For more details on the BEAD Subgrantee Selection Process, including scoring criteria and selection methodology, refer to CPUC's Initial Proposal volume 2 (IPv2) Sections 5.1.3, 5.3, 5.8, 5.10, and 5.11. The CPUC also hosted a webinar on BEAD Subgrantee Selection Process on December 3, 2024. The presentation materials and webinar recording can be accessed here and here.</p>	
13.	What is the low-cost service requirement?	<p>The CPUC has developed a solid foundation to incorporate broad considerations of affordability into its policies and regulations, including this BEAD program design, through its Rulemaking to Establish a Framework and Processes for Assessing the Affordability of Utility Service (R.18-07-006). The CPUC requires all BEAD-funded projects to offer a low-cost broadband service for the life of the infrastructure. This service must:</p> <ul style="list-style-type: none"> • Cost \$30 per month or less (\$75 per month or less on Tribal lands), inclusive of all government taxes and fees. The cost may be updated but may not exceed the CPI-U 12-month percentage point change for "All Items" and customers must be notified at least 30 days in advance of any price increase. • Be available to households at or below 200% of the federal poverty level or those eligible for the Affordable Connectivity Program. • Meet BEAD performance standards: at least 100 Mbps download, 20 Mbps upload, and latency no higher than 100 milliseconds. • Have no data caps, surcharges, or usage-based throttling, and is subject only to the same acceptable use policies to which subscribers of all other broadband internet access service plans offered to home subscribers by the participating subgrantee must adhere. • Allows free upgrades if the provider later offers a low-cost plan with higher speeds. • Includes free installation, a modem or router, and no minimum service term. <p>The CPUC will consider waiver requests (See BEAD NOFO, Section IV.C.2.c.i, page 66) from prospective subgrantees regarding specific parameters of the low-cost service</p>	<p>Feb 21, 2025/V. 2.0 Updated Mar 21, 2025</p>

		option (specifically, for the price charged for the low-cost service option); however, all subgrantees will still be required to offer a low-cost service option. For more details, see the CPUC's Initial Proposal volume 2 (IPv2), Section 13.	
14.	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.	Feb 21, 2025/V. 2.0
15.	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 .	Feb 21, 2025/V. 2.0
16.	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 100% of unserved and underserved locations in their project area. Once they have submitted an application for 100% of unserved and underserved locations in a specific project area, they can submit an application to serve 90% of unserved and underserved locations in that same 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 PAU within a proposal to form a larger project area.	Feb 21, 2025/V. 2.0
17.	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."	Feb 21, 2025/V. 2.0
18.	Do you plan to have a 2nd round of applications if not all eligible locations are taken in the 1st round?	The CPUC will identify the remaining PAUs that do not yet have a preliminary assignment and may undertake a second round to solicit additional grant applications for the remaining locations, depending on the number and location of the remaining eligible locations, as well as available BEAD funding. The CPUC's options for such a second round will depend in part on the time available under the timeline required by the BEAD rules. The second round process may include any of the following elements: revised PAU boundaries, limitation to unserved locations only, or other variations. See CPUC's Initial Proposal volume 2 (IPv2) Sections 5.1.3, 5.1.4, and 5.11 for more details.	Mar 7, 2025/V. 3.0

19.	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). You can verify BEAD eligibility using the post-challenge interactive map , which identifies all BEAD-eligible Broadband Serviceable Locations (BSL) in the state by FCC Location ID. This map incorporates the most current adjudicated challenge determinations and enforceable commitments from internet service providers.	April 4, 2025/V. 5.0
20.	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 , the CPUC's primary goal is to ensure 100 percent of the unserved and underserved BSLs in the post-challenge interactive map. 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 funding for CAIs will only be considered after all unserved and underserved locations have been addressed, and CAI cost-per-location will not be factored in the application.	April 4, 2025/V. 5.0
21.	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, applicants should submit their most competitive cost-per-location pricing. Per the BEAD NOFO , the CPUC will evaluate applications based on NTIA criteria, including prioritizing fiber deployment and maximizing service to unserved and underserved locations (BEAD NOFO , p. 13).	April 4, 2025/V. 5.0
22.	Does the latest BEAD Project Application Guide include opportunities for digital equity projects?	The CPUC follows the NTIA BEAD NOFO directives, which prioritizes fiber deployment, 100% coverage of unserved and underserved locations, low-cost internet service option, and Middle Class Affordability goals (BEAD NOFO , p. 7). While BEAD funding is primarily allocated to these objectives, applicants should review the latest NTIA guidance to determine if digital equity projects align with BEAD funding criteria.	April 4, 2025/V. 5.0
23.	Will the CPUC be publishing a list of successfully prequalified ISPs?	The CPUC will not publish a full list of prequalified ISPs.	April 4, 2025/V. 5.0
24.	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.	April 10, 2025/V. 6.0

		2. Long-term leases (i.e. greater than one year) of facilities required to provide qualifying broadband service, including infeasible right-of-use (IRU) agreements.	
25.	Can the lead applicant in a multi-county Memorandum of Understanding (MOU) respond to Prequalification Application questions and documentation on behalf of all participating counties, or must each county submit individually? Does this apply also for the Project Application?	<p>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.</p> <p>For the Project Application, only the lead applicant may submit the application. All project partners must be identified in the Partnerships template in the Project Application.</p> <p>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).</p>	April 10, 2025/V. 6.0
26.	Is the 20 percent allowance for including non-BEAD eligible locations calculated based on the total number of locations in the project area or as a percentage of the BEAD-funded portion of the project?	The 20 percent allowance for "served" non-eligible locations in a project area is calculated based on the total number of broadband-serviceable locations served by the project. According to the NOFO , at least 80 percent of broadband-serviceable locations served by the project must be unserved locations or underserved locations. For example, if a proposed project includes 100 broadband serviceable locations, a maximum of 20 may be "served" locations, and at least 80 must be unserved or underserved.	April 17, 2025/V. 7.0
27.	How is the estimated cost for the required 100 percent build scenario considered during scoring, and will it affect the evaluation of the more feasible 90 percent proposal, even though cost is not a scoring criterion?	<p>The CPUC does not prescribe how applicants must structure their 100 percent and 90 percent proposals. Each applicant is required to submit a proposal that serves 100 percent of unserved and underserved locations within the proposed project area. Applicants may also submit an optional 90 percent proposal as part of the same application. Instructions for submitting a 90 percent proposal are provided on p. 13 of the Application Guide.</p> <p>For the purpose of ranking, only the 100 percent proposal is scored. The 90 percent proposal, if submitted, receives the same score as the 100 percent proposal. We encourage applicants to submit the strongest possible application for their 100 percent proposal to ensure they stay competitive. The CPUC will evaluate 100 percent proposals first and will award a 90 percent proposal only if none of the 100 percent proposals with the same technology priority in a project area are feasible.</p> <p>While project cost is not a scoring criterion, it is considered when determining whether an award will be made. If the</p>	April 17, 2025/V. 7.0

		<p>proposed cost exceeds the Extremely High Cost Per Location Threshold (EHCPLT), the CPUC may not award the application and instead move on to the next highest scoring application.</p> <p>While project cost is not a scoring criterion, your project cost (specifically, the grant amount requested) has an indirect impact on the Minimum BEAD Outlay scoring criterion. For that criterion, "applicants will be scored based on the amount of matching funding committed by the applicant relative to the grant amount requested." (Initial Proposal volume II (IPv2), p. 42)</p>	
28.	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.	April 24, 2025/V. 8.0
29.	How are applications proposing only "reliable broadband service" technologies with a partial match waiver evaluated in comparison to applications using 100 percent Low Earth Orbit (LEO) technology with a 25 percent or higher match?	<p>Applications are evaluated in the following order:</p> <ol style="list-style-type: none"> 1. Application proposing Reliable Broadband Service (RBS) technologies with at least a 25% match are prioritized first 2. If no suitable RBS applications with a 25% match are available in a project area, applications proposing RBS technologies with a match waiver are considered next 3. Applications proposing alternative technologies, such as 100 percent Low Earth Orbit (LEO) satellite service, with a 25% or higher match are considered after all RBS applications. <p>Federal guidelines require that applications proposing Reliable Broadband Service (RBS) technologies with at least a 25 percent match be prioritized over applications requesting a match waiver for RBS technologies in the same project areas. RBS applications requesting a match waiver in areas with no other suitable RBS applications will be considered before any application proposing non-RBS alternative technologies (e.g., satellite) according to current NTIA technology prioritization rules.</p> <p>Census block groups that are designated by NTIA as high-cost areas are exempt from the match requirement. Applications that include high-cost areas will have a reduced minimum match requirement relative to the total project cost.</p>	April 29, 2025/V. 9.0
30.	In reference to Question 3.3Ai, are any additional steps or forms required to	No. Applicants seeking a waiver of the minimum high-need area requirement must select the relevant Project Area Units (PAUs) and check the box in Question 3.3Ai	April 29, 2025/V. 9.0

	apply for an automatic waiver of a minimum high-need area?	within the application. No further forms or additional steps are necessary.	
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General Application Information

#	Questions	Answers	Date/Version
1.	Where can I find information about the prequalification requirements?	<p>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 presentation materials are available here, and the webinar recording can be accessed here. Additional resources are also available here, which has an initial application checklist to help applicants prepare for Prequalification and Application phases, specifically noting items that may take longer to obtain or prepare.</p> <p>The CPUC provides Subgrantee Selection Process training and technical support, which can be found on the CPUC BEAD Program website.</p>	Feb 11, 2025/V. 1.0
2.	What factors will be used to determine which subgrantees are selected?	<p>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. Additionally, the National Telecommunications and Information Administration (NTIA)'s BEAD Subgrantee Qualifications Evaluation Guide offers guidance on scoring and selection criteria for subgrantees. More information is available on the NTIA website.</p> <p>The CPUC also offers training and technical support for the Subgrantee Selection Process, accessible on its BEAD Program website.</p>	Feb 11, 2025/V. 1.0
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.	Feb 11, 2025/V. 1.0
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?	<p>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.</p> <p>Some of these materials will be required for prequalification, while others will be required in the main application that will be scored. Applicants should begin preparing all these documents, as they will all be required during the prequalification and application window.</p>	Feb 11, 2025/V. 1.0

#	Questions	Answers	Date/Version
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.	Feb 11, 2025/V. 1.0
6.	What application components do you anticipate requiring the most lead time for applicants to complete?	<p>Preparing prequalification materials may require significant lead time for applicants. 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.</p> <p>The presentation materials are available here, and the webinar recording can be accessed here. Additional resources are also available here, which has an initial application checklist to help applicants prepare for Prequalification and Application phases, specifically noting items that may take longer to obtain or prepare.</p> <p>The CPUC also provides Subgrantee Selection Process training and technical support, which can be found on the CPUC BEAD Program website. Additional resources are also available at the CPUC BEAD Resources webpage.</p>	Feb 11, 2025/V. 1.0
7.	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 details on the Subgrantee Selection Process scoring criteria, please refer to Section 5.3 of the CPUC's Initial Proposal volume 2 (IPv2).	Feb 21, 2025/V. 2.0
8.	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.	Feb 21, 2025/V. 2.0
9.	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?	<p>As stated in the CPUC's Initial Proposal volume 2 (IPv2), applicants must attest that they:</p> <ul style="list-style-type: none"> ▪ 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. 	Mar 7, 2025/V. 3.0

#	Questions	Answers	Date/Version
		<p>For more details, see IPv2, p. 220-221.</p> <p>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.</p>	
10.	Are pre-application expenses allowable as part of the project application costs? If so, is there a cap on these expenses?	<p>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.</p> <p>To be eligible, pre-application costs must:</p> <ul style="list-style-type: none"> ▪ 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. <p>For example, engineering work required for an environmental assessment is typically an allowable pre-application expense. There is no cap for pre-application expenses, but applicants must include these costs in their financial, budget, and pro forma documentation within the application.</p>	Mar 7, 2025/V. 3.0
11.	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.	Mar 7, 2025/V. 3.0
12.	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.	Mar 21, 2025/V. 4.0
13.	What specific licenses and certifications must be uploaded under section	Applicants should include any certifications and licenses demonstrating their operational capacity to deploy a broadband project successfully. This includes relevant licenses for key engineers and any certification tied to	April 4, 2025/V. 5.0

#	Questions	Answers	Date/Version
	3.5A of the Prequalification Application Guide?	the technology proposed in the project. For more details, refer to IPv2 section 5.12.3.2 (p. 66).	
14.	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."	April 4, 2025/V. 5.0
15.	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.	April 4, 2025/V. 5.0
16.	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.	April 4, 2025/V. 5.0
17.	How should an applicant determine which locations to exclude in a 90% coverage proposal, and what is the submission process?	Applicants must select the 10% of locations to exclude based on their calculations to design the most cost-effective network. The application portal will auto-calculate the number of locations to remove. Applicants must use the "90 Percent Proposal Locations List" template, which will pre-populate with all BSLs in the application. Within the template, applicants must indicate which locations will be served and which will be excluded.	April 4, 2025/V. 5.0
18.	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. Applicants should monitor their email closely, as revision requests may come at any time and must be addressed within three business days. Once a Prequalification Application is submitted, applicants may proceed with their Project Application immediately. Given the tight timeline, applicants should ensure accuracy and conduct multiple quality control reviews before submission, as substantial revisions may not be feasible.	April 4, 2025/V. 5.0
19.	In the Other Public Funding Template, what does "Maximum cost of service to	This refers to the highest monthly cost a subscriber would pay, including the base subscription price and any recurring fees or taxes.	April 4, 2025/V. 5.0

#	Questions	Answers	Date/Version
	consumer" in Column M refer to?		
20.	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)	<p>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).</p> <p>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.</p>	April 10, 2025/V. 6.0
21.	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?	<p>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.)</p> <p>The "FireDistrict" column indicates whether a location falls within a Tier 2 or Tier 3 High Fire Threat district. This column is provided for informational purposes only and does not affect the enforceable commitment status of a location.</p> <p>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.</p>	April 17, 2025/V. 7.0
22.	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.	April 17, 2025/V. 7.0
23.	Regarding questions about pending court proceedings, must responses include only matters related to BEAD activities, or must they cover	The question pertains to violations of federal or state laws in general – not just those related to BEAD activities. If there are no legal proceedings that have been instituted for violations in the past three years but there are pending legal proceedings, applicants should provide a	April 17, 2025/V. 7.0

#	Questions	Answers	Date/Version
	all other types of proceedings? (Application Section 4)	brief description and explanation of those proceedings in the narrative field.	
24.	Can additional information be added after submitting the Prequalification Application and Project Application?	<p>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.</p> <p>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.</p>	April 29, 2025/V. 9.0
25.	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.	April 29, 2025/V. 9.0

BEAD Program Timeline

#	Questions	Answers	Date/Version
1.	What is the BEAD Program timeline?	<p>The California Public Utilities Commission (CPUC) has announced the timeline for the Broadband Equity, Access, and Deployment (BEAD) program rollout. Please note that the BEAD program timeline is provisional and subject to modification.</p> <p>To view the CPUC BEAD Timeline, visit the CPUC BEAD Program website.</p>	Feb 11, 2025/V. 1.0
2.	Which release are you using for the fabric locations? Version 3 or 4?	<p>The California Public Utilities Commission (CPUC) has released the map for the Broadband Equity, Access, and Deployment (BEAD) program rollout. The post-challenge interactive map reflects fabric version 4, dated December 31, 2023. To view the CPUC BEAD Map, visit the CPUC BEAD Program website. The map is subject to revision prior to the opening of subgrantee selection to capture state and federal enforceable commitments or per NTIA reconciliation guidelines.</p>	Feb 11, 2025/V. 1.0
3.	When will the BEAD application be available, and how long will the application window be open?	<p>The Prequalification Application and Project Application materials are available for download on the BEAD Resources webpage. The Prequalification Application period is currently open and will close on May 1, 2025, 11:59pm. The Grant Application Window is currently open and will close on May 9, 2025, 11:59pm. This provisional schedule is designed to meet NTIA-mandated deadlines for California and is subject to revision. Please plan accordingly and check the CPUC BEAD Program website for updates.</p>	Feb 21, 2025/V. 4.0 Updated Apr 24, 2025
4.	How long will each grant last?	<p>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. Deployment milestones must also account for necessary permits and CEQA approval. Additionally, "Speed to Deployment" is a scoring criterion, awarding up to 5 points for Priority Broadband Projects and 1 point for Other Last-Mile Broadband Projects. 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.</p>	Feb 21, 2025/V. 2.0
5.	When will the PAU map be released, and where can it be found?	<p>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.</p>	Mar 21, 2025/V. 4.0

#	Questions	Answers	Date/Version
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?	<p>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.</p> <p>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.</p>	April 24, 2025/V. 8.0
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, there cannot be exceptions.	April 29, 2025/V. 9.0

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?	<p>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.</p> <p>Presentation materials and video recordings can be found on the CPUC BEAD Events webpage and the BEAD Subgrantee Selection Process webpage.</p>	<p>Feb 11, 2025/V. 1.0 Updated April 29, 2025</p>

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 or attend the Office Hours for inquiries about the Subgrantee Selection Process. Due to a high volume of inquiries, we aim to respond within three business days.	Feb 11, 2025/V. 1.0
2.	Will there be technical assistance provided through the process?	<p>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.</p> <p>For questions about the BEAD Application Portal or technical support, contact Ready.net at cahelpdesk@ready.net.</p>	Feb 11, 2025/V. 1.0
3.	How often is the FAQ document updated, and where can the most recent version be found?	While the application window is open, the CPUC aims to update and publicly release the FAQ document on a weekly 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.	April 10, 2025/V. 6.0
4.	What tools or processes will be provided to assist ISPs in electronically verifying the eligibility of households for the 90 percent proposal? (Application section 3.3)	The portal will validate that the number of BSLs removed constitutes 10 percent of the application to arrive at a 90 percent proposal. The applicant can select any 90 percent of BSLs in the proposed project area from their proposal to arrive at a 90 percent proposal. Please use the "90 Percent Proposal Locations List" template in question 3.3.Bii in the Project Application to select BSLs to be served in the 90 percent proposal.	April 10, 2025/V. 6.0
5.	What tools or processes will assist ISPs in electronically verifying household eligibility for successor programs to the Affordable Connectivity Program (ACP)? (Application section 3.1)	The CPUC will publicize any successor programs to the Affordable Connectivity Program (ACP), if applicable, for use by BEAD subgrantees. The CPUC may require additional information from applicants on implementation of the low-cost and middle-class affordable service options during the compliance period.	April 10, 2025/V. 6.0
6.	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. Applicants should include any licenses or certifications required to operate in California, as well as any labor, health, or safety-related credentials relevant to their project.	April 24, 2025/V. 8.0

#	Questions	Answers	Date/Version
		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.	

Financial Capacity & Requirements

#	Questions	Answers	Date/Version
1.	What are the BEAD financial requirements?	<p>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.</p> <p>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.</p>	Feb 11, 2025/V. 1.0
2.	What are the CPUC's match requirements?	<p>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.</p> <p>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.</p> <p>Additionally, the NTIA has released the BEAD Match Primer, a guidance resource for Eligible Entities on matching funds.</p>	Feb 11, 2025/V. 1.0
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	Feb 11, 2025/V. 1.0

#	Questions	Answers	Date/Version
	<p>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?</p> <p>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?</p>	<p>information. A potential subgrantee without audited financial statements must also certify that it will provide audited financials within 12 weeks of submitting its application.</p> <p>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.</p> <p>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 prior to the opening of subgrantee selection to capture state and federal enforceable commitments or per NTIA reconciliation guidelines.</p>	
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?	<p>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.</p> <p>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.</p>	Feb 11, 2025/V. 1.0
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.	Feb 11, 2025/V. 1.0

#	Questions	Answers	Date/Version
		<p>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.</p> <p>The CPUC provides Subgrantee Selection Process training and technical support, webinar and presentation slides can be found on the BEAD Events webpage.</p> <p>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.</p>	
6.	If an applicant has a proforma model they use internally, can that be submitted for the BEAD application instead of using the template?	<p>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.</p> <p>Additionally, the National Telecommunications and Information Administration (NTIA)'s BEAD Subgrantee Qualifications Evaluation Guide offers guidance on scoring and selection criteria for subgrantees. More information is available on the NTIA website.</p> <p>The CPUC also offers training and technical support for the Subgrantee Selection Process, accessible on its BEAD Program website.</p>	Feb 11, 2025/V. 1.0
7.	Are audited financial statements required at the time of application or only after a grant is awarded?	<p>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.</p> <p>If an applicant does not have audited financials as part of its ordinary business operations, it must:</p> <ul style="list-style-type: none"> ▪ 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. <p>Alternative financial reporting options are available for public or similar entities with different requirements.</p>	Feb 21, 2025/V. 2.0

#	Questions	Answers	Date/Version
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 25% matching funds rule; the other requires a 25% match. How is the match requirement calculated?	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 minimum match requirement that would apply to the project as a whole would be: $[(100-10) \times 25\% + (10 \times 0\%)]/100 = 22.5\%$	Feb 21, 2025/V. 2.0
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?	<p>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:</p> <ol style="list-style-type: none"> 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: <ol style="list-style-type: none"> 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. <p>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.</p>	Feb 21, 2025/V. 2.0
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	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.	Feb 21, 2025/V. 2.0

#	Questions	Answers	Date/Version
	could be included in the total project cost?	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 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.	March 7, 2025/V. 3.0
12.	Can existing or funded middle-mile infrastructure be used as an in-kind match?	<p>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:</p> <ul style="list-style-type: none"> • 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. <p>Valuation is based on market value. For more details, see the Notice of Funding Opportunity (NOFO) (pp. 21-22).</p>	April 4, 2025/V. 5.0
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).	April 4, 2025/V. 5.0

#	Questions	Answers	Date/Version
14.	How is the Minimum BEAD Outlay Criterion scored for projects in designated high-cost areas where no match is required?	<p>The Minimum BEAD Outlay criterion awards points based on the percentage of matching funds relative to the requested BEAD grant amount:</p> <ul style="list-style-type: none"> • 65% match or more → 20 points • 55% match → 15 points • 45% match → 10 points • 35% match → 5 points <p>(See IPv2 p. 42.)</p> <p>For High-Cost Areas, the match requirement is waived for project areas fully within NTIA-designated High-Cost Areas. For mixed project areas (some PAUs in High-Cost Areas and some outside), the required match is proportionally reduced based on the number of Broadband Serviceable Locations (BSLs) in High-Cost PAUs.</p> <p>Example: If a proposed project has 100 eligible BSLs, and 10 are in High-Cost PAUs, the adjusted minimum match requirement is: $[(100-10) \times 25\% + (10 \times 0\%)] / 100 = 22.5\%$.</p>	April 4, 2025/V. 5.0
15.	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 to the NTIA's BEAD Letter of Credit waiver on the NTIA website .	April 10, 2025/V. 6.0
16.	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.	April 10, 2025/V. 6.0
17.	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.	April 10, 2025/V. 6.0
18.	Can a municipal applicant use backhaul and middle-mile fiber construction as an in-kind match for a BEAD project if the	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	April 10, 2025/V. 6.0

#	Questions	Answers	Date/Version
	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?	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.	
19.	What types of contributions qualify as cash or in-kind matching funds for the 90 percent proposal? 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)	<p>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.</p> <p>NTIA listed potential sources of in-kind contributions that, depending on the particular property or service and federal cost principles, could include:</p> <ul style="list-style-type: none"> • Employee services • Volunteer services • Equipment • 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 <p>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.</p> <p>NTIA released a match primer for states that contains relevant information and pages 21-22 of the NOFO describe rules for in-kind match.</p>	April 10, 2025/V. 6.0
20.	What are the guidelines for in-kind contributions, including eligibility, timing, application toward matching funds, and budget adjustments or match estimates if formal agreements	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.	April 10, 2025/V. 6.0

#	Questions	Answers	Date/Version
	are not finalized before the award? (Application section 3.3)	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 .	
21.	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?	<p>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.</p> <p>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.</p> <p>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.</p>	April 17, 2025/V. 7.0
22.	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?	<p>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.</p> <p>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.</p> <p>The questions and narratives are distinct. If a public entity submits both qualified audited financial</p>	April 24, 2025/V. 8.0

#	Questions	Answers	Date/Version
		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.	
23.	Does BEAD allow for contingencies in an applicant's construction budget, and where can guidelines on allowable contingencies be found?	<p>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.</p> <p>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 (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.</p>	April 24, 2025/V. 8.0
24.	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.	April 24, 2025/V. 8.0
25.	What are the consequences of requesting a match waiver on my application?	<p>The federal government requires that applications using Reliable Broadband Service that meet the required 25 percent match be considered first before any applications using Reliable Broadband Service requesting a match waiver in the same area.</p> <p>However, applications requesting match waivers in areas with no other suitable Reliable Broadband Service applications will be considered. Furthermore, certain census block groups are exempt from the</p>	April 24, 2025/V. 8.0

#	Questions	Answers	Date/Version
		<p>match requirement since they are NTIA-designated high-cost areas and will therefore lower the minimal match requirement for a project that includes such areas.</p> <p>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).</p>	
26.	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?	<p>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 issued by Weiss of B- or better. The letter must specify a dollar value and cannot include qualifications on the commitment.</p> <p>A replacement letter may be submitted later as long as the institution meets the relevant requirements, and the applicant seeks approval from the CPUC.</p>	April 29, 2025/V. 9.0
27.	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.	April 29, 2025/V. 9.0
28.	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.	April 29, 2025/V. 9.0
29.	In reference to Question 7.2B, 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 is required in question 7.2B for entities that selected "Letter of Credit" in question 7.2.	April 29, 2025/V. 9.0

#	Questions	Answers	Date/Version
		A bankruptcy opinion letter is not required for applicants that opt to submit a performance bond. See IPv2 pp. 59-60 for more details.	
30.	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.	April 29, 2025/V. 9.0
31.	Since we have to provide the pro forma for the proposal that serves 100% of locations but we know that our 90%+ proposal will be the more cost-effective option, can we modify your provided pro forma template to include a version for the 100% BSL proposal and a version for the 90%+ BSL proposal?	Applicants do not need to submit a pro forma for the 90% proposal. Please do not modify the template or complete the pro forma for the 90% proposal.	April 29, 2025/V. 9.0

Technical Capacity & Eligibility

#	Questions	Answers	Date/Version
1.	What are the conduit access point requirements?	<p>The National Telecommunications and Information Administration (NTIA) Notice of Funding Opportunity (NOFO) Section titled "Conduit Access Points", pg. 66 states:</p> <p>"Any Funded Network deployment project that involves laying fiber-optic cables or conduit underground or along a roadway must include interspersed conduit access points at regular and short intervals for interconnection by unaffiliated entities. Where a project proposes to lay conduit, Eligible Entities shall require prospective subgrantees to propose to deploy a reasonable amount of excess conduit capacity and to propose a conduit access point interval as part of the grant application process and shall consider the adequacy of the prospective subgrantee's proposed excess conduit capacity and access points when evaluating the application."</p>	Feb 11, 2025/V. 1.0
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.)	April 4, 2025/V. 5.0
3.	How is "cost-effectiveness of future scalability to significant performance levels of proposed technology" defined and evaluated under the "Technical Capability" scoring category for Last-Mile Broadband Projects?	<p>For projects utilizing "Non-Priority" or "Alternative Technology" technology types, 1 point will be awarded if the applicant demonstrates a cost-effective future upgrade and capital investment path. This means the proposed network must be designated to meet future speed and performance demands efficiently.</p> <p>Applicants must describe:</p> <ul style="list-style-type: none"> ▪ A projected technical upgrade path ▪ A capital investment timeline ▪ Costs for equipment refresh and replacement cycles. <p>For more details, see IPv2 p. 44.</p>	April 4, 2025/V. 5.0
4.	Do the requirements for certifying operational capacity apply to the lead applicant or to the selected service providers? (Prequalification Application question 3.4)	<p>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.</p> <p>Question 3.4bi requires applicants with less than two years of experience to explain how they will meet operational capacity requirements. This can include "resumes from key personnel, project descriptions and narratives from contractors, subcontractors, or other partners with relevant operational experience, or other comparable evidence," as well as "documentation of plans to acquire additional resources to increase the organizations' organizational</p>	April 10, 2025/V. 6.0

#	Questions	Answers	Date/Version
		<p>capabilities, including third-party contractors and partners with relevant operational expertise, to the extent that they cannot demonstrate that they have already acquired those capabilities." (Application Guide, p. 19)</p> <p>For the Project Application, applicants must update any changes to key personnel or organizational capacity since the Prequalification Phase.</p>	
5.	How will eligibility for low-cost and middle-class affordable service options be verified? Will tools be provided? (Application section 3.10)	Subgrantees are responsible for ensuring compliance with all requirements for low-cost and middle-class affordable service options. 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 implementation of the low-cost and middle-class affordable service options during the compliance period.	April 10, 2025/V. 6.0
6.	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 as a non-telephone corporation parent company with a subsidiary that is a telecommunications corporation)?	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.	April 10, 2025/V. 6.0
7.	How are "cost-effective upgrades" defined or measured when assessing whether proposed infrastructure can meet future speed and performance needs? (Application question 4.7)	<p>One point is assigned to this sub-criterion, and applicants will receive either one or zero points. This sub-criterion will be evaluated based on the technology proposed and whether it allows for cost-effective capital investment paths and meeting future speed and performance needs. In the narrative in 4.7Di, the applicant should describe the types of technology utilized.</p> <p>Generally, HFC meets these requirements and would receive one point. In general, DSL and fixed wireless do not feature the same extent of cost-effective capital investment paths and ability to meet future speed and performance needs and do not meet the scoring requirements, other than implementations of massive MIMO and beamforming with sufficient backhaul, which would receive one point.</p>	April 10, 2025/V. 6.0

#	Questions	Answers	Date/Version
		Applicants should indicate in the narrative in 4.7Di if they will implement massive MIMO and beamforming with sufficient backhaul.	
8.	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.	April 24, 2025/V. 8.0
9.	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?	<p>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.</p> <p>In December 2023, the NTIA issued Tailoring the Application of the Uniform Guidance to the BEAD Program, which includes two documents:</p> <ul style="list-style-type: none"> • Official Notice • Explainer Document <p>The Notice states:</p> <p>"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."</p> <p>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.</p> <p>Per Section C.02 (p.17) of the DOC Terms:</p> <p>"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 Office, during which time the Federal Government retains an undivided,</p>	April 24, 2025/V. 8.0

#	Questions	Answers	Date/Version
		<p>equitable reversionary interest in the property (Federal Interest)."</p> <p>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.</p>	
10.	Does the obligation to offer affordable broadband plans 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 affordable broadband service plans for low-income and middle-class 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.	April 29, 2025/V. 9.0
11.	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.	April 29, 2025/V. 9.0
12.	In reference to Question 5.3B, what is the reasoning behind requiring professional engineers to review and stamp documentation before a final low-level design is approved?	<p>The NTIA requires states to obtain certification from a Professional Engineer as outlined in the BEAD Notice of Funding Opportunity (NOFO) (see p. 74). Consequently, this requirement is included in California's IPv2 (p. 68-69).</p> <p>Question 5.3B is intended to assess whether the project's design, network capabilities, and performance commitments are adequately represented and validated. It ensures that the Professional Engineer can certify the integrity and performance expectations of the proposed network design.</p>	April 29, 2025/V. 9.0

Compliance with Labor Laws

#	Questions	Answers	Date/Version
1.	What are the BEAD labor laws and how will they be operationalized?	<p>Details about the Labor Standards and Protection requirements in the Subgrantee Selection Process are included in the CPUC's Initial Proposal volume 2 (IPv2) Section 8, 9, and 10, available for download on the CPUC BEAD Program website.</p> <p>Additionally, the CPUC provides Subgrantee Selection Process training and technical support, webinar and presentation slides can be found on the BEAD Events webpage.</p>	Feb 11, 2025/V. 1.0
2.	Please address the jurisdiction of local unions. Will the CPUC sign a Project Labor Agreement (PLA) with unions?	<p>The CPUC will award grants to subgrantees for BEAD broadband and alternative technologies deployment and will not enter into agreements directly. That said, CPUC's Initial Proposal volume 2 (IPv2) states: "In scoring past and future compliance with state labor laws, the CPUC will the following optional practices and award points on the basis of robust and binding commitments: ...Using project labor agreements..." Although Subgrantees are encouraged, but not required, to utilize project labor agreements, the CPUC scoring criteria awards up to 20 points "based on (1) a demonstrated history of compliance with federal and state labor laws; (2) demonstrated commitments to future compliance with federal labor laws; and (3) the quality and contents of labor practice-related items submitted during the Application Phase."</p> <p>The applicant is encouraged to review the CPUC's scoring criteria found in the IPv2 Section 5.3.2, Sections 8 "Labor Standards and Protections," and Section 9 "Workforce Readiness" for more information.</p> <p>For general questions about the CPUC BEAD Program, visit the CPUC BEAD Program website.</p>	Feb 11, 2025/V. 1.0
3.	The selection criteria include factors such as affordability, technology, matching funds, and speed to deployment. Are there any factors that consider public/ worker safety?	<p>There are several sections in California's Initial Proposal volume 2 (IPv2) that address workplace safety and will be the guide for this program.</p> <p>Sections 5.3.1 and 5.12.4 of IPv.2 will require subgrantees to certify and discuss several safety related topics during the qualification phase. This includes adherence to existing laws, the creation of safety committees, and training to ensure projects are completed at a high standard. This will also include workforce safety plans and practices, including adherence to national and state safety codes and standards. This will be required of subgrantees as well as the contractors and subcontractors they utilize.</p>	Feb 11, 2025/V. 1.0

#	Questions	Answers	Date/Version
		<p>Section 8 of IPv2 describes how safety and training will be a factor in scoring applications. It also discusses the regular reporting that will be required from awarded projects for safety training, licensing, and compliance with applicable safety and training laws.</p> <p>Section 9.3 of IPv2 discusses the importance of worker safety and how the program will ensure "strong labor standards and use of a highly trained, safe and effective workforce." It also discusses the importance of union checks and oversight on safety. If a subgrantee chooses to use non-union labor, section 9.5 of IPv2 will require details on how subgrantee will adhere to safety training, certification, and licensure requirements.</p> <p>Section 17.2.7 of IPv2 details the periodic visits to awarded projects to ensure that required safety practices are being followed.</p> <p>Specifically concerning underground infrastructure, sections 11.1.1 and 11.1.2 of IPv2 discuss projects accessing State conduit and local community conduit, which will reduce the need for digging. Section 11.2 of IPv2 describes the "dig-once" goal of this program, which will also minimize digging. There is also a requirement in the Notice of Funding Opportunity (NOFO) that funded underground infrastructure should be available for lease by future projects by different entities. These conditions should lower the amount of digging that will be required for current and even future projects. Less digging should lower the chances of damaging other utilities.</p>	
4.	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.	March 7, 2025/V. 3.0

Legal Compliance

#	Questions	Answers	Date/Version
1.	What are the consequences of not meeting deployment milestones or other requirements in the BEAD program?	<p>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:</p> <ul style="list-style-type: none"> ▪ Deny reimbursement requests ▪ Require partial or full forfeiture of BEAD funds ▪ Impose financial penalties for fraud, misconduct, or non-performance. <p>The CPUC defines performance as including:</p> <ul style="list-style-type: none"> ▪ 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. 	April 4, 2025/V. 5.0
2.	What is the CEQA exemption process for those using existing infrastructure?	<p>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.</p> <p>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.</p> <p>For more details, refer to the CEQA Guidelines - CEQA Title 14.</p>	April 4, 2025/V. 5.0
3.	For question 5.19A in the Project Application, is a general approach to NHPA mitigation sufficient, or must individual locations be addressed?	<p>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).</p>	April 24, 2025/V. 8.0
4.	How would CPUC handle a project if it was submitted as an underground fiber project but	<p>An applicant proposing any changes to project design will be required to notify CPUC and may need</p>	April 24, 2025/V. 8.0

#	Questions	Answers	Date/Version
	then, during design, must be constructed using aerial fiber?	<p>additional CPUC approval, depending on the extent and timing of the change.</p> <p>Changes to project design are likely to impact several aspects of the project and possibly require reassessment of the following, including:</p> <ul style="list-style-type: none"> • Permitting • Budgeting • Environmental consultation processes <p>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.</p> <p>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 defines Priority Broadband as end-to-end fiber, regardless of whether it is installed underground or aerially.</p>	
5.	<p>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?</p> <p>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?</p>	<p>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.</p>	<p>April 29, 2025/V. 9.0</p>

Supply Chain Compliance

#	Questions	Answers	Date/Version
1.	What are the key grant application requirements for construction and material sourcing?	<p>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). Application materials are still being developed. Additionally, the National Telecommunications and Information Administration (NTIA)'s BEAD Subgrantee Qualifications Evaluation Guide provides further guidance. The CPUC also offers training and technical support for the Subgrantee Selection Process, accessible on the CPUC BEAD Program website and BEAD Events page.</p> <p>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:</p> <ul style="list-style-type: none"> • Construction materials, iron, steel, manufactured products, and electronics. • Compliance with BABA for all BEAD-funded projects. • Potential federal agencies waivers for certain BABA requirements. <p>NTIA has issued a limited waiver for some BABA provisions under BEAD but maintains many domestic sourcing requirements.</p> <p>For more detail, refer to the NTIA Build America, Buy America Compliance and Documentation Requirements and Procedures guidance.</p>	Feb 21, 2025/V. 2.0
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.	March 7, 2025/V. 3.0
3.	Does an ISP need to comply with Build America, Buy	Build America, Buy America (BABA) compliance only applies to the BEAD funded project. For example, any	March 7, 2025/V. 3.0

#	Questions	Answers	Date/Version
	America (BABA) across all its projects and operations, or only for BEAD-funded projects?	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.	

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?	<p>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.</p> <p>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.</p>	Feb 11, 2025/V. 1.0
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?	<p>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.</p> <p>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.</p> <p>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.</p> <p>Additionally, the National Telecommunications and Information Administration (NTIA)'s BEAD Subgrantee Qualifications Evaluation Guide offers guidance on scoring and selection criteria for subgrantees. More information is available on the NTIA website.</p>	Feb 11, 2025/V. 1.0

#	Questions	Answers	Date/Version
		The CPUC also offers training and technical support for the Subgrantee Selection Process, accessible on its BEAD Program website .	
3.	Are there any requirements that differ from the posted checklist for Tribal entities?	<p>CPUC is currently developing the application materials and will provide training and technical support for addressing this topic.</p> <p>For more information about BEAD requirements with regard to Tribal entities, please refer to Section 4.3 of the Initial Proposal volume 2 (IPv2).</p> <p>The CPUC provides Subgrantee Selection Process training and technical support, which can be found on the CPUC BEAD Program website.</p>	Feb 11, 2025/V. 1.0
4.	Are there specific rules for bidding in partnerships?	<p>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.</p> <p>Additionally, partnerships must be exclusive within the BEAD grant opportunity to prevent conflicts of interest and collusion. This means:</p> <ul style="list-style-type: none"> ▪ A partner cannot participate in multiple partnerships. ▪ A partner cannot provide more than one proposal for overlapping areas, whether independently or with a partner. 	Feb 21, 2025/V. 2.0
5.	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.	April 10, 2025/V. 6.0
6.	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)	<p>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.</p> <p>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.</p>	April 10, 2025/V. 6.0
7.	Is the Ownership Information template relevant for	Yes. The Ownership Information template is designed to capture the ownership status of the applicant.	April 10, 2025/V. 6.0

#	Questions	Answers	Date/Version
	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)	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.	
8.	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.	<p>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.</p> <p>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.</p>	April 24, 2025/V. 8.0 Updated April 29, 2025
9.	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?	<p>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.</p> <p>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.</p>	April 24, 2025/V. 8.0 Updated April 29, 2025

#	Questions	Answers	Date/Version
		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.	
10.	How much detail is the CPUC expecting regarding workforce size and wage scales in the pre-qualification application, given that the project scope is still being developed and a formal bidding process will be conducted?	The CPUC understands that some applicants may not be able to provide significant detail for these items in the Prequalification Application. Applicants should provide a reasonable approximation based on their expectations at this stage.	April 29, 2025/V. 9.0
11.	Can you clarify Table 1, Section 1 of the Ownership template, which asks for "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?	<p>For the Ownership Information template:</p> <ul style="list-style-type: none"> 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." <p>Neither table requires a full list of all shareholders. Shareholders with extremely small ownership stakes (below 10 percent) do not need to be included.</p> <ul style="list-style-type: none"> 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. <p>For additional detail on ownership disclosures standards, see 47 CFR §1.2112(a)(1).</p>	April 29, 2025/V. 9.0
12.	If a local government applicant has not yet finalized selection of a partner due to their required RFP timeline, will they be	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	April 29, 2025/V. 9.0

#	Questions	Answers	Date/Version
	limited to selecting partner ISPs who were approved for prequalification? What if they were approved through a PPP in a different locality?	<p>capacity and technical plans for the network.</p> <p>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.</p>	

Post-Challenge Interactive Map

#	Questions	Answers	Date/Version
1.	What mapping tool will we use for qualified areas?	<p>The mapping tool will be an integrated feature of the BEAD Grants Management System (GMS) which will be available on March 25, 2025. Currently, applicants may consult the post-challenge interactive map for the Broadband Equity, Access, and Deployment (BEAD) program rollout here.</p> <p>The post-challenge interactive map represents the results of California's BEAD Challenge Process submitted to the National Telecommunications and Information Administration (NTIA) in December 2024 and approved in January 2025. It identifies all BEAD-eligible Broadband Serviceable Locations (BSLs) in the state by FCC Location ID, incorporating adjudicated challenge determinations and enforceable commitments from internet service providers.</p> <p>The map is subject to revision prior to the opening of subgrantee selection to capture state and federal enforceable commitments or per NTIA reconciliation guidelines.</p>	Feb 11, 2025/V. 1.0
2.	We are considering a certain set of census block groups for BEAD funding. We are working under the impression that locations with Licensed Fixed Wireless as their only NTIA-approved Reliable Broadband Service will be considered "unserved" for BEAD funding. Could you please verify this assumption?	<p>The recently posted map resulting from the CPUC's Challenge process indicates which locations are eligible for funding. This map will be updated closer to the application window to reflect additional enforceable commitments and may be updated per the NTIA's data reconciliation guidance. The eligibility of an individual location may be affected by several factors including results of the Challenge process, enforceable commitments and guidance from the NTIA.</p> <p>The California Public Utilities Commission (CPUC) has released the post-challenge interactive map for the Broadband Equity, Access, and Deployment (BEAD) program rollout. To view the CPUC BEAD Map, visit the CPUC BEAD Program website.</p>	Feb 11, 2025/V. 1.0
3.	Will the BEAD locations currently shown as "eligible for funding" on the BEAD Challenge Map reflect the March 1 BDC submission?	The CPUC released a post-challenge interactive map which references the FCC Fabric version and BDC dates it is based on. This map is subject to revision before subgrantee selection opens to incorporate state and federal enforceable commitments and align with NTIA reconciliation guidelines.	Feb 21, 2025/V. 2.0
4.	What should an applicant do if it	Non-BSLs are locations which should not be served by the BEAD Program because they are not inhabitable buildings. Examples	April 4, 2025/V. 5.0

#	Questions	Answers	Date/Version
	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?	<p>include silos, condemned buildings, rocks, or hay bales mistakenly identified in the Fabric as BSLs.</p> <p>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:</p> <ul style="list-style-type: none"> • 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) <p>The application must submit at least one of the following required evidence for the non-BSL:</p> <ul style="list-style-type: none"> • Attestation by a unit of local or Tribal government; • Attestation by a government entity owning the location; • Attestation by the private property owner; • Evidence of an FCC Challenge filed to declare this location as a non-BSL. • The applicant must also indicate its evidence type in the Locations List and upload the evidence in the Project Application. <p>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.</p> <p>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.</p>	
5.	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	<p>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;</p> <ul style="list-style-type: none"> • September 26, 2024, for state enforceable commitments; • October 1, 2024, for federal enforceable commitments. <p>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.</p>	April 4, 2025/V. 5.0

#	Questions	Answers	Date/Version
	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?	<p>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.</p> <p>Applicants must submit a copy of the enforceable commitment as evidence. The applicant must also indicate its evidence type in the Locations List and upload the evidence in the Project Application.</p> <p>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.</p> <p>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.</p>	
6.	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 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?	<p>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 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.</p> <p>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.</p> <p>Applicants are required to provide evidence of subscription (service record) to demonstrate that the location has been served by the privately-funded network. The applicant must also indicate its evidence type in the Locations List and upload the evidence in the Project Application.</p> <p>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.</p> <p>Please see the following sources for more information: "Final Proposal (FP) Submission Requirements: Non-Service Codes,"</p>	April 4, 2025/V. 5.0

#	Questions	Answers	Date/Version
		March 2025; " Final Proposal Guidance Version 1.2 ," January 2025.	
7.	How will the CPUC update its data to make sure it's accurate before awards are made and approved by NTIA?	<p>The CPUC will follow NTIA's Final Proposal Guidance version 1.2, or any subsequent guidance rendered 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.</p> <p>The CPUC will update its dataset to include new state and federal enforceable commitments and incorporate the most recent version of the FCC Fabric before the Final Proposal is submitted and before final awards are made.</p> <p>Final location adjustments based on applicant identifications of locations that should not receive BEAD funding will be subject to CPUC review and approval and will occur before the Final Proposal is submitted and before final awards are made.</p> <p>For full guidance, please refer to NTIA's Final Proposal Guidance version 1.2 and the Final Proposal Submission Requirements: Non-Service Codes. Note that final NTIA guidance on data reconciliation during Final Proposal is subject to change.</p>	April 4, 2025/V. 5.0
8.	Is it acceptable to use custom Location IDs for non-BSL or ineligible locations not listed in the CPUC BEAD datasets? (Project Application Section 3.3Eii)	<p>No, applicants may not add locations beyond those identified in the CPUC BEAD datasets. The "Locations List" template in 3.3D and evidence upload in 3.3Eii are intended only for applicants to propose the removal of locations they believe should not be considered eligible for funding.</p> <p>The term "non-BSLs" in Section 3.3Eii refers to locations currently listed in the CPUC BEAD datasets as eligible broadband serviceable locations (BSLs), but which the applicant believes are not actually BSLs. For example, if listed location is indicated as a habitable structure but is not in fact habitable, it may be proposed for removal.</p> <p>For additional guidance, please refer to FAQ Questions 4-7 under the "Post-Challenge Interactive Map" section.</p>	April 17, 2025/V. 7.0
9.	What evidence is acceptable to support a location coded as "served" in the Location List Template in question 3.3D if there is no active subscriber at the location?	Acceptable evidence includes proof of a current subscription to nonsubsidized service. If the location is served under an enforceable commitment, a copy of that enforceable commitment is also acceptable.	April 24, 2025/V. 8.0
10.	What code should be provided in the	High cost is not an acceptable reason for exclusion in the Locations List. The only acceptable reasons are:	April 24, 2025/V. 8.0

#	Questions	Answers	Date/Version
	3.3D Location List Template spreadsheet if a location is excluded due to the high cost of building fiber but may be better served by another technology?	<ul style="list-style-type: none"> • The location should not have broadband service; • The location does not require mass-market broadband service; • The location is already served by an enforceable commitment; or • The location is already served by nonsubsidized service (a privately funded network). <p>Applicants may propose to exclude high-cost locations in the optional 90 percent coverage proposal (Question 3.3Bii), but must still submit a proposal for 100 percent of fundable Broadband Serviceable Locations (BSLs) in the project area.</p>	
11.	Can FFA grant recipients obtain and download the data that support the BEAD map for their grants? If so, what is the process?	<p>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.</p>	April 29, 2025/V. 9.0

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.	Feb 11, 2025/V. 1.0
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). Projects are ranked based on technology type, coverage percentage, and overall score. This is how projects are compared and reviewed. For more details on project evaluation and selection, refer to Section 5.11 of the Initial Proposal volume 2 (IPv2).	Feb 21, 2025/V. 2.0
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.	Mar 7, 2025/V. 3.0
4.	To what extent does the identification of high-need areas mean that Project Areas will be pre-drawn in eligibility maps? Can applicants define their own Project Areas?	Applicants can define their own Project Area by combining adjacent Project Area Units (PAUs), which are based on Census Block Groups (CBGs) and Tribal areas. Applicants can select any combination of PAUs, provided they form one contiguous Project Area. At least 50 percent of the PAUs in an applicant's Project Area must be high-need areas (Low-Income Area or Disadvantaged Community, including Tribal areas). Applicants may request a waiver of the 50 percent threshold if they have included all high-need areas that are immediately adjacent to non-high-need areas in their proposed Project Area. For Project Areas that include Tribal lands, applicants may submit the application without meeting the minimum threshold or maximum available inclusion requirements for high-need PAUs.	Mar 21, 2025/V. 4.0

#	Questions	Answers	Date/Version
5.	Are PAUs equivalent to CBGs, and can applicants aggregate adjacent PAUs into larger project areas? Can any CBGs contain overlapping Tribal areas?	<p>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.</p> <p>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 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.</p> <p>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.</p> <p>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.</p>	<p>Mar 21, 2025/V. 4.0</p> <p>Updated Apr 4, 2025</p>
6.	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?	Yes, the CPUC will soon release a shapefile download of all Project Area Units (PAU). Check the data download webpage regularly for availability.	<p>April 4, 2025/V. 5.0</p>
7.	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	<p>April 4, 2025/V. 5.0</p>

#	Questions	Answers	Date/Version
		<p>application for the PAUs surrounding a Tribal area, it is permitted to do so.</p> <p>All applications are scored using the same rubric, which varies based on the proposed technology type.</p> <p>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.</p>	
8.	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?	<p>Yes. CPUC's Initial Proposal volume 2 (IPv2), p. 55 states that:</p> <ul style="list-style-type: none"> ▪ 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 and will not exceed the Extremely High Cost Per Location Threshold (EHCPLT) or area budget. ▪ If an applicant declines, the CPUC may extend the offer to other applicants with proposals in nearby or adjacent PAUs. <p>During the awards and negotiation process, top-performing applicants will receive their full proposed project areas if their cost proposals are reasonable given available state funds. However, when project areas overlap, the CPUC may:</p> <ul style="list-style-type: none"> ▪ Remove PAUs already awarded to another applicant. ▪ Offer a reduced project area with a revised grant amount. ▪ Award non-contiguous areas if necessary. 	April 4, 2025/V. 5.0
9.	Does the 90 percent threshold for alternative or back up pricing proposals apply to the total number of locations or	The 90% threshold applies to the total number of eligible locations (unserved and underserved combined). Applicants do not need to cover 90% of	April 4, 2025/V. 5.0

#	Questions	Answers	Date/Version
	separately to unserved and underserved locations?	unserved locations and 90% of underserved locations separately.	
10.	Does the Middle-Class Affordable Service Option (MCASO) requirement apply only to BEAD-eligible locations (unserved and underserved) within the project area, or to all addresses, including served locations?	The Middle-Class Affordable Service Option (MCASO) requirement applies only to the locations included by the applicant in its proposed project in the application and within an applicant's Project Area. Served locations outside the proposed area are not subject to this requirement.	April 4, 2025/V. 5.0
11.	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 to align with NTIA reconciliation guidelines. 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.	April 4, 2025/V. 5.0
12.	If the smallest project area is a Census Block Group (CBG), can BEAD funding be used to support infrastructure for the entire group, or only for the unserved, underserved, and CAI locations within it? For example, if a CBG has 100 locations but only one is classified as "unserved," can funding be used to build infrastructure serving all locations, or is funding limited to the portion of costs directly allocable to the unserved location?	BEAD funding is intended for unserved and underserved locations. However, BEAD funds may support up to 20 percent of non-eligible Broadband Serviceable Locations (BSLs) if their inclusion strengthens the project's long-term business case. In such cases, funding must be primarily allocated to BEAD-eligible locations, and the inclusion of non-eligible BSLs may impact the overall project scoring and the likelihood of selection.	April 4, 2025/V. 5.0
13.	How does the priority of serving unserved vs. underserved locations impact application competitiveness? If a PAU has a high number of underserved locations but only a few unserved ones, would including it in an	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," meaning applicants should propose to serve 100 percent of all unserved and underserved locations in their applications. This approach incentivizes	April 4, 2025/V. 5.0

#	Questions	Answers	Date/Version
	application reduce its competitiveness?	applicants to maximize service to BEAD-eligible locations (IPv2, p. 47).	
14.	Can you confirm that each applicant submits one prequalification but must file separate project applications for each non-contiguous area?	<p>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.</p> <p>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.</p>	April 4, 2025/V. 5.0
15.	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?	<p>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.</p> <p>The CPUC will soon release a shapefile download of all Project Area Units (PAUs). Check the data download webpage regularly for availability.</p>	April 4, 2025/V. 5.0
16.	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.	April 4, 2025/V. 5.0
17.	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.	April 10, 2025/V. 6.0
18.	Is there a way to access detailed location data (including latitude and longitude) for underserved and unserved areas?	Currently, only location IDs are available in a downloadable format. To obtain detailed data such as map coordinates or addresses, applicants must use their existing fabric license or apply for one through the NTIA or CostQuest.	April 17, 2025/V. 7.0

#	Questions	Answers	Date/Version
		Applicants can download the available CPUC BEAD map data from the CPUC BEAD Data Download webpage .	
19.	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.	April 24, 2025/V. 8.0
20.	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.	April 29, 2025/V. 9.0
21.	Will the application portal automatically generate a map proposed at 90% based on the 90% Locations List uploaded by applicants?	No. The map displayed on the "Select Locations" page in the application portal will not change based on the 90 percent proposal. The 90 percent Locations List will be received and processed by the portal and the application review team, but the visual map in the portal will not update in response to the uploaded 90 percent Locations List.	April 29, 2025/V. 9.0
22.	Which file should applicants use for Project Application item 3.3.D, Locations List: the .csv generated by the portal after selecting PAUs or the template on the CPUC website?	Applicants must use the Locations List template from the Project Application portal. Please complete all required templates as provided through the Portal rather than the versions posted on the CPUC website.	April 29, 2025/V. 9.0
23.	What are the qualifications that make a PAU a "high need" area and is there anywhere we can see specific details that makes each individual PAU "high need"?	<p>High-need PAUs are defined as Low-Income Areas (LIAs) and Disadvantaged Communities (DACs).</p> <p>As described in IPv2 pp. 43, a Low-income area is defined as census tract where aggregated household incomes are less than 80 percent of area or state median income, utilizing whichever of the two aggregated household incomes data points is higher.</p> <p>As described in IPv2 pp. 43, a Disadvantaged Community is defined as any of the following:</p>	April 29, 2025/V. 9.0

#	Questions	Answers	Date/Version
		<ul style="list-style-type: none"> • Census tracts receiving the highest 25 percent of overall scores in CalEnviroScreen 4.0. • Census tracts lacking overall scores in CalEnviroScreen 4.0 due to data gaps but receiving the highest 5 percent of CalEnviroScreen 4.0 cumulative pollution burden scores. • Census tracts identified in the 2017 DAC designation as disadvantaged, regardless of their scores in CalEnviroScreen 4.0. • Lands under the control of federally recognized Tribes. <p>These areas are visible in the "High Need" layer in the mapping function of the application portal.</p>	