

CNMI BPD BROADBAND, EQUITY, ACCESS, AND DEPLOYMENT (BEAD) SUBGRANT PORTAL FAQ SHEET

What is the BEAD Program?

The **Broadband Equity, Access, and Deployment (BEAD) Program** is a federally funded initiative under the **Infrastructure Investment and Jobs Act (IIJA)** aimed at expanding broadband infrastructure and ensuring universal internet access. Through this program, the **CNMI Broadband Policy & Development (BPD) Office** has been allocated funding to deploy high-speed internet across the Northern Mariana Islands, focusing on:

- Connecting unserved and underserved communities
- Fostering digital inclusion
- Strengthening the local broadband workforce

What is the CNMI BEAD Subgrant Portal?

The **CNMI BEAD Subgrant Portal** is an online platform designed to facilitate the **CNMI BEAD Subgrant Program**, the next phase of CNMI's broadband expansion efforts. This program provides **funding opportunities for qualified applicants** to build broadband infrastructure in designated **Project Funded Areas (PFAs)**.

The **CNMI Broadband Policy & Development (BPD) Office** is committed to ensuring a **competitive, transparent, and efficient** subgrant process to **maximize the impact of these federal funds**, ultimately improving broadband access for communities across the Northern Mariana Islands.

Who is eligible to apply for the CNMI BEAD Subgrant Program?

The CNMI BEAD Subgrant Program is **open to qualified entities** that meet the following criteria:

- **Legal Authorization:** Applicants must be legally authorized to deploy broadband infrastructure and provide broadband services within the Commonwealth of the Northern Mariana Islands (CNMI).
- **Operational Experience:** Entities should have a proven track record of delivering broadband or related services. Specifically, applicants are required to have provided voice, broadband, and/or electric transmission or distribution services for at least two consecutive years prior to the application submission date, or be a wholly owned subsidiary of such an entity.
- **Financial Capability:** Prospective subgrantees must demonstrate financial stability and the ability to fund project costs that exceed the grant amount. This includes providing audited financial statements and certifying the availability of funds for the project's duration.
- **Managerial and Technical Expertise:** Applicants are required to submit business plans, network designs, and other documentation to substantiate their managerial and technical capabilities. This ensures they can competently carry out the proposed broadband deployment projects.

By setting these eligibility standards, the CNMI Broadband Policy and Development (BPD) Office aims to ensure that subgrant funds are allocated to entities capable of effectively expanding broadband infrastructure and services across the CNMI.

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When did the CNMI Subgrant Portal open and when will it close?

The CNMI BEAD Subgrant Portal for Project Funded Areas (PFA) Applications officially opened on **March 31, 2025, at 12:00 PM ChST** and will remain open for 45 days, closing on **May 15, 2025**.

All applications must be submitted through the portal by 12:00 PM ChST on May 15, 2025 to be considered for funding. Applicants are encouraged to begin preparing early to ensure all requirements are met by the deadline.

How does the CNMI BPD Office evaluate applications submitted through the BEAD Subgrant Portal?

Applicants to the CNMI BEAD Subgrant Program will be evaluated through a fair, open, equitable, and competitive process established by the CNMI Broadband Policy & Development (BPD) Office. The evaluation process includes the following key components:

- **Completeness of Application:** The BPD Office will conduct an initial review to ensure all required documentation has been submitted. Incomplete proposals will not be considered. Applicants missing information will receive one written request to submit the necessary documentation within three calendar days. Failure to respond will result in disqualification.
- **Scoring Rubric:** Applications will be assessed using a BEAD Scoring Rubric by BPD staff or designated evaluators. The rubric will evaluate measurable project outcomes, financial viability, technical feasibility, and community impact. This scoring system will be objective and publicly available prior to the application intake period.
- **Priority Broadband Project Scoring (Initial Round – Fiber-Focused):** For the initial round of funding focused on fiber-to-the-premises deployment, the following criteria will be used:
 - * Minimal BEAD Program Outlay (up to 50 points):
Scoring will favor cost-effective proposals based on the number of unserved and underserved locations in the Project Funded Area (PFA). The lowest-cost proposal per PFA will receive full points, with other proposals scored proportionally.
- **Affordability (up to 20 points):** Applicants must submit pricing for 1 Gbps/1 Gbps service. Lower proposed monthly rates will receive higher scores.
- **Open Access (5 points):** Projects that provide open-access wholesale broadband service for the life of the network will receive points.
- **Deployment Timeliness (up to 5 points):** Faster deployment timelines will receive higher scores.
- **Non-Priority / Other Last-Mile Broadband Project Scoring (Potential Second Round):** If a second round is required due to a lack of qualified applications or funding constraints in PFAs, a modified rubric—still aligned with NTIA guidance—will be used.
- **Due Diligence:** The BPD Office will verify the feasibility of proposed timelines, milestones, and service commitments. Each applicant's capacity to complete the project will be closely assessed.
- **Labor Practices:** Priority will be given to applicants with a demonstrated record of, and plans to comply with, federal labor and employment laws. New providers may demonstrate commitment to strong labor standards to strengthen their proposals.
- **Compliance with BEAD NOFO Requirements:** All evaluations will be aligned with the requirements set forth in the BEAD Notice of Funding Opportunity (NOFO).
- **Transparency and Accountability:** The scoring criteria will be publicly released, the review process will be documented, panel deliberations will be recorded, and decision summaries will be made available.

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- **Conflict of Interest:** All reviewers and BPD staff involved in the evaluation process will follow established conflict of interest policies to ensure impartiality.
- **Subgrantee Qualifications:** Applicants must meet minimum standards for financial, managerial, technical, and operational capacity. They must also provide required documentation on ownership, legal compliance, and other public funding. Failure to meet these minimum qualifications will result in ineligibility.
- **Consideration of Existing Funding Commitments:** If existing or pending federal or local funding is identified within a PFA, applicants may be notified and given the opportunity to revise their proposals.

The CNMI BPD Office aims for a rigorous and fair selection process to promote the best outcomes for broadband expansion.

Can I make changes to my application after submission?

Once an application has been fully submitted through the CNMI BEAD Subgrant Portal, it cannot be edited or changed.

- **For Project Funded Area (PFA) applications,** applicants may edit or delete saved forms prior to submission. However, once the application is officially submitted, no further modifications are permitted through the portal.
- **If an application is incomplete or missing required information,** the CNMI Broadband Policy & Development Office (BPD) may issue one written request for the applicant to provide the missing documentation within three calendar days. Failure to respond within the given timeframe will result in the application being rejected.
- **If a conflict with an existing or new funding commitment is identified within a PFA,** all applicants for that area will be notified and provided 14 calendar days to resubmit, withdraw, or attest that their proposal does not overlap with the existing award.
- **During a negotiation phase,** BPD reserves the right to request modifications to subgrant applications in consultation with the National Telecommunications and Information Administration (NTIA).

Applicants are strongly encouraged to review their application thoroughly before submission, as opportunities to make changes after submission are limited and conditional.

What happens after I submit my application?

After you submit your application through the CNMI BEAD Subgrant Portal, it will undergo a structured review and evaluation process coordinated by the CNMI Broadband Policy & Development (BPD) Office:

- **Initial Review for Completeness:** BPD will first assess whether all required documentation has been submitted. If any part of the application is missing or incomplete, BPD will send one written request for the applicant to provide the necessary documentation within three calendar days. Failure to respond within the given timeframe will result in rejection of the application.
- **Evaluation Against Scoring Rubric:** Complete applications will be evaluated using a published BEAD Scoring Rubric by BPD staff or their subcontractors. Evaluation will consider measurable project outcomes, financial viability, technical feasibility, and community impact. For the initial round, which is primarily focused on fiber-to-the-premises projects, scoring will prioritize cost-effectiveness, affordability, open access, and deployment timeliness. BPD will also conduct due diligence to confirm that the applicant's timelines, service milestones, and delivery capacity are reasonable.

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- **Overlapping Funding Review:** If an existing or new award commitment from another funding source is identified within a proposed Project Funding Area (PFA), all applicants for that PFA will be notified. Applicants will have 14 calendar days to resubmit, withdraw, or attest that their proposal does not use BEAD funds for Broadband Serviceable Locations (BSLs) already covered by the prior commitment.
- **Provisional Selection and Internal Review:** Based on evaluation results, BPD will prepare internal recommendations for each application, which may include award, denial, or required modifications. No applicants will be notified of provisional selections during this internal phase.
- **Negotiation Phase (If Applicable):** During any potential negotiation period, BPD may request modifications to the application in consultation with the National Telecommunications and Information Administration (NTIA).
- **Notification of Results:** Applicants will be formally notified of their award status once BPD receives authorization from NTIA to release results.
- **Public Posting of Applications:** Once all network deployment subgrants have been awarded, BPD will post the submitted applications and materials to its website for public transparency. Applicants are encouraged to ensure that all materials submitted are accurate, complete, and ready for public disclosure.

What are the key dates and milestones for the CNMI BEAD Subgrant Program, including the application period and anticipated award timeline?

The CNMI BEAD Subgrant Program follows a series of key milestones designed to ensure an open and competitive process for awarding broadband infrastructure funding. The following timeline outlines major phases of the program:

- **Pre-Application/Qualification Start & Close:** While a formal pre-application and qualification process was not conducted, the CNMI Broadband Policy & Development Office (BPD) opened the Subgrant Portal on March 7, 2025, to allow prospective applicants to begin entering only their registration and qualification information in advance of the full application period.
- **Application Start Date:** The CNMI BEAD Subgrant Portal officially opened for Project Funded Areas (PFAs) Applications on **March 31, 2025, at 12:00PM ChST.**
- **Application Close Date:** The application portal will remain open for 45 days after March 31, 2025, meaning it will close on **May 15, 2025, at 12:00PM ChST.**
- **Provisional Award Date:** In accordance with the CNMI BEAD Initial Proposal Volume II, the CNMI Broadband Policy & Development Office (BPD) will first score, rank, de-conflict, and provisionally select all subgrant applications for each Project Funding Area (PFA). **However, it is explicitly stated that no subgrant applicant will receive any notification of this internal-only “provisional” award status.**
- **NTIA Approval of CNMI Final Proposal:** Although we cannot guarantee the date of the NTIA’s approval of the CNMI BPD’s Final Proposal, the NTIA BEAD NOFO states that **Final Proposals will be due to NTIA no later than 365 days after the approval of the Initial Proposal Volume II.** Afterwards, it is up to NTIA’s discretion when they will approve the Final Proposal.
- **State Final Award Announcement:** As soon as the **NTIA authorizes announcements,** the CNMI BPD Office will announce the State Final Awards.

Where can we acquire a FRN number for our CNMI Government?

An FRN can be obtained by registering through the Federal Communications Commission (FCC) website.

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Is there a scope of work where entities/agencies that are not primarily involved in communications could apply for?

The NTIA BEAD Program is primarily intended for entities that are directly involved in broadband and communications infrastructure. Eligible applicants must have the technical and operational capacity to carry out broadband deployment projects. While collaboration with other agencies or organizations may be encouraged for support roles, only those with the ability to implement broadband solutions—such as Internet Service Providers, public utilities, and Non-Profit Organizations can apply for funding under the core scope of the program.

Can individuals avail of this program or is it only open to businesses?

The NTIA BEAD (Broadband Equity, Access, and Deployment) Program is not intended for individuals. It is designed for eligible entities such as Internet Service Providers (ISPs), non-profit organizations, public utilities, and local governments that have the capacity and qualifications to deploy broadband infrastructure. These entities can apply for funding to expand high-speed internet access in unserved and underserved areas.

Will the information entered in the prequalification section of the application flow into the RFP section for the individual applications or will applicants have to re-enter everything for each application?

Applicants will only need to complete the registration portion once. That information will automatically carry over into the individual Project Funded Areas (PFAs), so there's no need to re-enter the same details multiple times.

The link to the BroadbandUSA FAQs is for a June 2022 version. On their website they have a 3.17.2025 version 8.0 published. Does the CNMI Broadband Office have any FAQs at this time for the preregistration or RFP process?

The CNMI Broadband Policy and Development Office will be using this document as our official FAQ and will update it weekly, every Wednesday.

Are we required to fill out the FCC Form 175 now or can that be done later?

Although **there is no mention of FCC Form 175**, applicants that have provided voice and/or broadband service **must certify that they have timely filed Commission Form 477s and the Broadband DATA Act submission, if applicable.**

Section: Managerial Capability (Subsection: Availability Questions): Does this apply to the CNMI Market only?

No, this does not apply exclusively to the CNMI market. If necessary, you may clarify in the relevant sections that the program was conducted within the market of the company, rather than specifically within the CNMI market.

Section: Managerial Capability (Subsection: Availability Questions): As the Federal program has ended, does this information requested refer to the accounts during the program duration?

If the program has ended, you may indicate '0' where applicable. If the program is still ongoing, please report the most current active data.

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Section: Managerial Capability (Subsection: Availability Questions): Of all Availability questions #1 to #5, which of this information is confidential and proprietary?

For the "Evidence supporting compliance with FCC rules and regulations*", **the time period explicitly mentioned in the BEAD NOFO is the two consecutive years prior to the subgrant application submission.**

Section: Managerial Capability (Subsection: Availability Questions): Would the applicant be able to request for information be confidential?

When disclosing any FCC issues, enforcement actions, etc., while a specific look-back period is not defined in the sources, **applicants are expected to disclose any pending or completed matters related to compliance with FCC rules and regulations. This suggests that the disclosure should be comprehensive and not limited to a specific timeframe.**

Section: Managerial Capability (Subsection: Availability Questions): Within the preregistration form, you have requested information on availabilities for households, businesses, and CAls. Are you requesting that an estimate be provided on the number in each category that the company can serve currently within 10 days of an order or the number in each category that the company is currently serving?

The information requested refers to the number in each category—households, businesses, and community anchor institutions (CAls)—**that the company is currently serving.** This data helps establish a clear understanding of your current service footprint and supports the assessment of broadband coverage and capacity.

Section: General Information: Small Business - May we clarify is the NTIA definition of Small Business (number of employees, or revenue)?

Although the NTIA BEAD NOFO does not include a specific definition of 'small business,' **it is implied that the Small Business Administration (SBA) definition may be the standard,** as it is referenced in the NTIA BEAD NOFO.

What is the requested method for submitting questions for BEAD?

Inquiries related to the CNMI BEAD Subgrant Portal **may be submitted via email to cnmi.bpd@gmail.com.**

What is the approach for special treatment of confidential information from the applicant?

As stipulated in the CNMI BEAD Initial Proposal Volume II,' the following provisions apply to subgrant applications:

- Any information included with the **BEAD subgrant application deemed confidential by the applicant must be individually (by page or electronic file) marked as confidential.**
- All protections offered by the **CNMI Open Government Act (OGA) to prevent disclosure will be applied.**
- **Individual Non-Disclosure Agreements (NDAs) may also be executed with BPD if so desired.** However, such NDAs must be requested **no less than 45 days prior to the beginning of the BEAD Subgrant Portal Application process,** and the responsibility to request and seek completion of the NDA rests with the applicant.

Is there a character limit for any of the narratives?

There is **no character limit** for any of the narratives.

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UPDATED: April 16, 2025

Section: Other Public Funding: Geography award attachment reference number (up to 3 digits) - What is this referring to?

Geography Award Attachment Reference Numbers (up to 3 digits) are identifiers that applicants assign to files showing the geographic area covered by a publicly funded broadband infrastructure project. These reference numbers are used to match each project with its corresponding map or geographic data attachment and should be included in the file name of that attachment.

Section: Labor and Workforce- Labor peace agreements - Please clarify what are these?

A Labor Peace Agreement (LPA) is **an agreement negotiated between an employer and a union in which the employer agrees to remain neutral during a union organizing campaign and not interfere with union organizing efforts.** In exchange, the union typically agrees not to engage in picketing, work stoppages, boycotts, or other forms of economic disruption.

In the context of the BEAD Program, **Labor Peace Agreements are identified as one of several labor-related practices that can demonstrate a commitment to strong workforce protections during broadband infrastructure deployment.**

As outlined in the CNMI's *Initial Proposal Volume II*, governmental and non-governmental subgrantees are encouraged to consider LPAs—alongside other measures such as using a directly employed workforce, paying prevailing wages, utilizing local hire provisions, ensuring union neutrality, and employing an appropriately credentialed and skilled workforce.

Subgrantees must submit a detailed narrative describing how they will ensure compliance with federal labor and employment laws. These elements will be evaluated under the Fair and Safe Labor Practices scoring criterion as part of the CNMI BEAD Subgrant Program.

Will the link to the current and future updates of the CNMI BEAD FAQs be filed on CNMI Broadband Policy & Development – Working for better internet and digital equity for ALL CNMI residents?

Yes, the link to the current and future updates of the CNMI BEAD FAQs is available in two places:

- **CNMI Broadband Policy & Development Office Website** – The FAQs can be accessed through the BEAD Subgrant Program section alongside other key resources and announcements.
- **CNMI BEAD Subgrant Portal** – The FAQ sheet is also posted directly on the Subgrant Portal itself and is updated every Wednesday to ensure applicants have access to the most current information.

We encourage all users to regularly check both platforms for updates.

Is micro-trenching allowable for the fiber deployment? If yes, are there any limitations or guidelines that we need to follow?

In the CNMI, there is currently no formal policy from the Department of Public Works (DPW) regarding microtrenching specifically. However, DPW typically enforces a minimum depth of 24 inches for underground fiber installations to ensure adequate protection, with actual depths ranging from 18 to 36 inches.

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Microtrenching may be considered an allowable method under BEAD if it complies with local utility coordination, minimum depth requirements, and all applicable federal, state, and local regulations. Subgrantees should ensure proposed installation methods meet local standards and permitting requirements.

UPDATED: April 23, 2025

Does BEAD require Federal Wages for Construction? Or do we follow local wages for all employees?

All applicants must comply with **all applicable federal, state, and local laws and regulations**, including those related to wages.

Applicants will receive **additional scoring consideration under the BEAD program's Fair and Safe Labor Practices criterion** for committing to pay prevailing wages and benefits to workers. Regardless of scoring, if a law requires the payment of federal or local prevailing wages, **compliance is mandatory**.

Applicants are responsible for ensuring they understand and meet any wage-related obligations that apply to their specific projects.

What do we need to do if we want to request an extension for our application submission?

Applicants seeking an extension must **submit their request as soon as possible** to the program's general email address. The request must include a **detailed rationale** explaining the reason for the extension.

Per Vol. 2, it states Open Access as "ensure the provision of open access wholesale broadband service throughout the lifespan of BEAD-funded networks, offering fair, equitable, and unbiased terms to all prospective retail providers." Is allowing other providers to run their fiber through our conduits included?

Yes, allowing other providers to run their fiber through your conduits can be considered part of fulfilling open access requirements under the BEAD Program. Open access, as referenced in Volume II of the CNMI BEAD Initial Proposal, is defined as ensuring the provision of open-access wholesale broadband service throughout the lifespan of BEAD-funded networks. This means offering fair, equitable, and unbiased terms to all prospective retail providers seeking to use the network.

The BEAD Notice of Funding Opportunity (NOFO) further defines "open access" as a nondiscriminatory wholesale arrangement, where subgrantees allow other providers access to and use of their network infrastructure at just and reasonable rates. Since conduits are an integral part of broadband infrastructure, allowing other providers to utilize conduit space supports this goal by enabling access to essential pathways for deploying broadband services.

Additionally, the BEAD NOFO requires that any network deployment project involving underground fiber or conduit must include interspersed conduit access points at regular and short intervals to facilitate interconnection by unaffiliated entities. It also instructs Eligible Entities to require subgrantees proposing conduit projects to deploy a reasonable amount of excess conduit capacity. These provisions indicate that the program explicitly encourages conduit sharing as a way to promote access and reduce deployment barriers.

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The CNMI BEAD Initial Proposal reinforces this by highlighting “Conduit Sharing Initiatives” as a strategy for reducing costs and increasing access. These initiatives are intended to offer standardized processes, pricing models, and expedited review timelines for interested providers.

Together, these elements strongly support the idea that permitting other providers to run fiber through your conduits aligns with both the letter and spirit of the BEAD Program’s open access requirements.

UPDATED: April 30, 2025

In the pre-registration, you have requested a "geography of award number." The number is up to 3 digits. Where is this information? I am not familiar with a geography number.

The section being referred to is specifically about **Public Funded Broadband Projects (not BEAD-related projects)**. For the *Geography of Award* field - this is typically used in federally funded broadband projects. If your project doesn't have a specific Geography of Award number, you can use '000' or any other default number as a placeholder.

You have requested a contribution % to one decimal. The percentage is different by Census Tract and by Census Tracts awarded. What is the value the is being requested?

Regarding projects with varying match amounts across different census tracts: we recommend listing each project (census tract) separately to ensure accurate reporting of the match percentages.

You have requested information on ownership. At what level are you requesting this detail? The application will be a legal entity in the CNMI. That legal entity is under another legal entity that is not registered in the CNMI. Ultimately, a holding company owns all of the legal entities in the corporate hierarchy.

BPD is requesting ownership details at **all levels of the corporate hierarchy necessary** to identify any party with a direct or indirect ownership interest of 10 percent or more in the CNMI applicant, ultimately extending to the holding company if that threshold is met. You will need to provide information for the CNMI legal entity, the legal entity not registered in the CNMI that owns it, and the holding company that owns all entities in the hierarchy, especially focusing on ownership percentages at each level to determine if the 10% indirect ownership threshold is met for the holding company.

Labor and Workforce Information (Rows 116-123): For the Labor and Workforce section, we do not know how to answer the questions about job title, staffing type, number of positions, timing when needed, duration, etc because much of this information is really going to be impacted by the number of Census Tracts won, the timeline commitments and the available staffing in the region that we can hire directly or contract. Also, based on the statement in 7.03a.1. of the Draft agreement, we are inferring that a certification in compliance with 7.03a.1. replaces this preregistration request.

1. For the labor details in your PFA applications, please provide separate estimates for each PFA as if it were being evaluated independently. While we understand the interconnected nature of workforce deployment, we need individual projections to properly evaluate each application. You can note in your narrative that final workforce arrangements may vary based on overall award outcomes.

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2. Regarding Section 7.03a.1 of the Draft Agreement - this section outlines post-award labor reporting requirements for larger projects. The labor information we're requesting during the application phase, as emphasized in the CNMI BEAD Initial Proposal Vol II FINAL regarding compliance with federal labor and employment laws, serves a different purpose – to evaluate your capabilities and plans before an award is made. Therefore, you should still provide the requested labor details in your application for each PFA.