

# CNMI BPD

## BEAD Final Proposal

September 7, 2025 (ver. 3)

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 CNMI Broadband  
Policy and Development  
Office

The Commonwealth of the Northern Mariana Islands (CNMI) has drafted the following Final Proposal, as required under the Broadband, Equity, Access, and Deployment Program (BEAD). Upon receipt and consideration of comments to this document, the CNMI will submit this document for consideration to the National Telecommunications and Information Association (NTIA), the administrators of BEAD, including the Assistant Secretary of the U.S. Department of Commerce.

Upon approval of this plan, the Office of Broadband will be able to access the program funds required to implement the Final Proposal.

Comments on the BEAD Final Proposal should be submitted via email to [cnmi.bpd@gmail.com](mailto:cnmi.bpd@gmail.com) by 11:59 PM on August 23, 2025, for review and consideration.

## Version History

VERSION	DATE	CHANGES
1.0	8/16/2025	DRAFT Released for Public Comment
2.0	8/27/2025	Incorporate Public Comments throughout document as needed with emphasis on clarifying Requirement 12.  This version Submitted to the NTIA prior to September 4, 2025 deadline for approval.
3.0	9/08/2025	Incorporated NTIA curing edits and clarifications; revised Requirement 1 wording to clarify application review and PBP designation and noted NTIA monitoring; Clarified CAI deployment; expanded Requirement 11 and substantially strengthened Requirement 12 (detailed PBP checklist, resilience rationale, and supporting examples); minor editorial, pagination, and formatting updates.

Hafa Adai yan Tirow,

On behalf of the Office of the Governor's Broadband Policy and Development (BPD), we are proud to submit the Commonwealth's Broadband Equity, Access, and Deployment (BEAD) Final Proposal to the National Telecommunications and Information Administration (NTIA).

We dedicate this submission to the late Governor Arnold I. Palacios, whose vision and leadership established the BPD three years ago and charged us with a clear directive: **secure the funding, plan wisely, and build the robust digital foundation upon which the CNMI can grow a modern, resilient digital economy.** The BEAD program is a central pillar of that vision. It is how we move from aspiration to action—delivering the infrastructure, affordability, and reliability that unlock better education, healthcare, emergency response, public services, and jobs for every resident across our islands.

The CNMI faces a unique and urgent challenge: today, **100% of our locations lack sufficient broadband access.** With more than \$80 million in BEAD funds, we are taking a disciplined, tech-neutral, and results-driven approach to close this gap quickly, affordably, and sustainably—while laying the network foundation for long-term economic growth and innovation.

Since our Initial Proposal, we completed a transparent, NTIA-compliant subgrant selection across all 21 Project Funding Areas to ensure robust competition and fairness. We then **executed a Benefit of the Bargain (BOTB) round that drove down costs and improved outcomes, producing more than \$50 million in program savings versus initial estimates.** Throughout, we adopted a technology-neutral framework that prioritizes the lowest reasonable cost per broadband-serviceable location while meeting or exceeding performance, reliability, and resiliency standards suitable for island environments. We also embedded strong accountability in every award, including milestone-based reimbursements, clawback provisions, detailed construction schedules, environmental and labor compliance, and ongoing performance monitoring. In parallel, we coordinated closely with local governments, community anchor institutions, and providers to align builds with priority needs in education, healthcare, emergency response, and commerce.

What BEAD means for the CNMI's digital economy is straightforward and transformative. It provides the foundation for growth by delivering high-capacity, resilient networks that support business formation, remote work, e-commerce, and tourism services, while enabling modern digital government services. It strengthens workforce and education by ensuring reliable connections for students and adult learners and by creating pathways for tech and skilled trades employment in network construction, operations, and cybersecurity. It enhances healthcare and public safety by expanding telehealth access, improving hospital connectivity, modernizing emergency communications, and hardening infrastructure for island conditions and severe weather.

This Final Proposal reflects the **CNMI's commitment to deliver affordable, high-speed service to every unserved and underserved household and eligible community anchor institution,** while safeguarding public funds and maximizing long-term value. Our team has executed this work amid fiscal and logistical constraints more complex than most states and territories—remaining on schedule, within budget, and aligned with NTIA's BEAD Restructuring Policy Notice.

As we move from planning to execution, our focus is clear: enforce construction timelines and quality standards, accelerate permitting and interagency coordination, reduce delays, and ensure affordable service reaches residents across all islands. **This is how we honor Governor Palacios' directive—by turning a bold vision into infrastructure that works for people.**

We welcome your review and input. The Final Proposal is posted at <https://bpd.cnmi.gov>. Please send comments to [cnmi.bpd@gmail.com](mailto:cnmi.bpd@gmail.com) through August 23, 2025.

With your partnership, we will deliver a connected, resilient, and digitally accessible CNMI—and a strong digital economy.

Regards,

Glen Hunter

Special Assistant to the Governor for Broadband Policy and Development  
Commonwealth of the Northern Mariana Islands

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## Acronyms

<b>ACRONYM</b>	<b>DEFINITION</b>
BABA	Build America, Buy America Act
BEAD	Broadband Equity, Access, and Deployment
BOTB	Benefit of the Bargain
BPD	Broadband Policy and Development Office
BSL	Broadband Serviceable Location
CAI	Community Anchor Institution
CNMI	Commonwealth of the Northern Mariana Islands
EHCPLT	Extremely High-Cost Per Location Threshold
EHP	Environmental and Historic Preservation
FCC	Federal Communications Commission
FEMA	Federal Emergency Management Agency
Gbps	Gigabits per second
IJA	Infrastructure Investment and Jobs Act
IPv2	Initial Proposal, Volume II
ISP	Internet Service Provider
IXP	Internet Exchange Point
LCSSO	Low-Cost Service Option
LEO	Low Earth Orbit
Mbps	Megabits per second
NIMO	Northern Islands Mayors Office
NIST	National Institute of Standards and Technology
NOFO	Notice of Funding Opportunity
NTIA	National Telecommunications and Information Administration
NTPC	Notice to Proceed with Construction
NTPPIA	Notice to Proceed with Pre-Implementation Activities
OAG	Office of the Attorney General
PEIS	Programmatic Environmental Impact Statement
PFA	Project Funded Area
PBP	Priority Broadband Projects
RPN	Restructuring Policy Notice (Juen 6, 2025)
ULFW	Unlicensed Fixed Wireless

## 0. FINAL PROPOSAL DATA SUBMISSION

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

**See attached fp\_subgrantees.csv file**

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

**See attached fp\_deployment\_projects.csv file**

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

**See attached fp\_locations.csv file**

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

**See attached fp\_no\_BEAD\_locations.csv file**

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

**No**

0.6. **Attachment (Required – Conditional on a ‘Yes’ Response to Intake Question 5):** Complete and submit the CAIs CSV file (named “fp\_cai.csv”) using the NTIA template provided. Although CAIs are not included under (f)(1) deployment projects, to confirm the Eligible Entity’s compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTIA template is required. The Eligible Entity must only include CAIs funded via BEAD in this list; the Eligible Entity may not propose funding CAIs that were not present on the approved final list from the Eligible Entity’s Challenge Process results.

**N/A**

# 1. SUBGRANTEE SELECTION PROCESS OUTCOMES (REQUIREMENT 1)

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

This narrative describes the Commonwealth of the Northern Mariana Islands (CNMI) Broadband Policy and Development (BPD) Office’s deployment Subgrantee Selection Process (SGS), showing its consistency with CNMI’s approved Initial Proposal (Volume II) as rigorously modified by the BEAD Restructuring Policy Notice (RPN).

BPD’s overarching objective is to deliver reliable, high-speed broadband to every resident of the CNMI. To meet that objective, the BPD executed a rigorous, transparent, and NTIA-compliant Subgrantee Selection Process designed to (a) prioritize unserved locations first, then underserved locations, and finally eligible Community Anchor Institutions (CAIs) consistent with IJJA priorities; (b) align BEAD funds with other funding sources where practicable; (c) administer a competitive award process that minimizes BEAD outlay per funded Broadband Serviceable Location (BSL); and (d) ensure selected projects satisfy resilience, reliability, scalability, and national security considerations appropriate to the CNMI.

## **Implementation in response to the RPN**

Main Round and RPN timing: BPD opened its initial competitive Main Round on March 31, 2025, initially for 45 days and extended twice, closing June 15, 2025. The BEAD Restructuring Policy Notice was issued on June 6, 2025 while the Main Round was still open. In keeping with NTIA requirements under the RPN, BPD conducted at least one additional competition—the Benefit of the Bargain (BOTB) Round—that applied the RPN’s updated rules to every BEAD-eligible location.

IP correction and BSL list revision: Before launching the BOTB round, BPD filed the required Initial Proposal (IP) Correction with NTIA to incorporate the RPN’s terms into the approved Initial Proposal. BPD also updated the CNMI fundable BSL list per RPN Section 4, using NTIA reason codes to investigate and document locations that do not require BEAD funding and to incorporate any newly eligible locations created by federal enforceable commitment defaults.

Rescission of preliminary selections and level playing field: No preliminary and provisional subaward selections were issued during the Main Round.

### **BOTB Round design and conduct**

BOTB timing and participation: The BOTB Round opened July 1, 2025 and closed July 16, 2025. The BOTB reopened qualification and allowed (i) previous applicants to stand on existing or to submit revised/new applications, and (ii) new applicants to participate regardless of technology type. Qualification documentation was reopened to all; previous applicants were not required to resubmit qualification documents.

Technology neutrality and broad eligibility: The BOTB welcomed all applicant types—incumbents, new entrants, cooperatives, non-profits, utilities, and others—consistent with 47 U.S.C. §1702(h)(1)(A)(iii) and the RPN’s technology-neutral approach. No provider types were excluded.

Scoring, prioritization, and evaluation: BPD applied the RPN’s simplified scoring framework. The primary criterion emphasized minimizing BEAD Program outlay (Minimal BEAD Program Outlay / lowest BEAD cost per BSL) consistent with the RPN requirement. BPD used the RPN rubric (black-and-white scoring) so that cost-effectiveness could be objectively compared across proposals. Secondary scoring criteria were not needed.

### **BOTB outcomes and competitive results**

**Robust competition:** Four potential subgrantees participated in the BOTB round. BPD received multiple applications for each of its 21 predefined Project Funding Areas (PFAs), and notably multiple applications for every fundable BSL. This robust competition demonstrated the feasibility of achieving universal coverage in the CNMI and produced strong cost outcomes.

**Savings and selections:** The BOTB competition drove lower BEAD outlays compared to earlier estimates; BPD estimates program savings in excess of \$50 million versus initial projections. For each PFA, Priority Broadband Projects (PBPs) that met the statutory definition and the BPD PBP checklist were scored under the RPN rubric; among qualifying PBPs the lowest BEAD outlay was provisionally selected for that PFA.

### **Consistency with the Initial Proposal (Volume II) as modified by the RPN**

**Prioritization of locations:** The BPD process followed the IIJA and approved Initial Proposal prioritization: unserved locations first, then underserved, then CAIs. Given the CNMI context—100% of locations are unserved or underserved (except RDOF-funded locations)—BPD’s practical focus was on serving every location.

**PFA definitions and avoidance of overlap:** BPD predefined 21 PFAs using the NTIA Subgrant Selection Tool’s census tract grouping. Prospective subgrantees could not redefine PFA boundaries, preventing overlapping proposals and enabling consistent like-for-like comparisons across applicants, consistent with Volume II design.

**Evaluation procedures and PBP substantiation:** BPD applied a per-PFA PBP pass/fail checklist (aligned to IIJA and the RPN) that required applicants to submit PE-certified network designs, capacity calculations, resilience and disaster recovery plans, national security/SCRM commitments, and business documentation. PBP assessment ensured projects met performance, scalability, reliability, resilience, and security expectations appropriate for CNMI’s typhoon-prone and power-vulnerable environment. Only applications that satisfied the PBP

checklist were considered PBPs. Among qualifying PBPs, award determination was made using the Minimal BEAD Program Outlay criterion per the RPN.

Use of RPN scoring rubric and limited use of secondary criteria: Because each PFA attracted multiple qualifying PBP proposals, Minimal BEAD Program Outlay produced clear distinctions among proposals in every PFA. No PFA required secondary criteria application because competing proposals were not within the 15% threshold that would trigger use of additional factors. BPD ensured all applicants were informed of the updated RPN rubric prior to the BOTB round.

CAI treatment: BPD treated CAIs as BSLs embedded within PFAs rather than creating separate CAI-only PFAs. All CNMI CAIs had LocationIDs and were included in BSL listings. BOTB PBP proposals provided robust CAI coverage—all offering symmetrical gigabit or greater connections—so CAIs will be served through the selected BOTB subgrantees in accordance with the BEAD prioritization framework.

If no applications had been received: BPD certifies that every PFA and every fundable BSL received at least one application during the selection process; therefore, contingency procedures for areas with no applicants were not invoked. BPD affirms that procedures described in the Initial Proposal for engaging providers in areas without applicants remain in place if needed.

Outreach and fairness measures: BPD implemented broad outreach (emails, public notices, webinars, stakeholder meetings, and social media), accepted all qualifying applicants, provided cure periods where appropriate, documented conflicts of interest, and required objective documentation for PBP substantiation. All proposals were reviewed by BPD staff with technical and programmatic expertise; internal controls preserved reviewer objectivity and transparency.

NTIA oversight: NTIA monitored BPD's SGS process and held a Subgrantee Selection Monitoring meeting with BPD on August 14, 2025.

Following that review, NTIA authorized publication of the provisionally selected subgrantees.

#### Records and compliance

IP correction, BSL updates, and reason codes: BPD filed the IP Correction and used NTIA reason codes to document locations excluded from BEAD funding. Documentation supporting all no-BEAD determinations is retained per NTIA guidance.

Retention of records: BPD certifies that it will retain all subgrantee records in accordance with 2 C.F.R. §200.334, including subgrantee network designs, diagrams, project costs, timelines, and capital investment schedules, for at least three years from the subgrant's final expenditure report.

#### Summary

CNMI's approach prioritized extending broadband access first to unserved locations, then underserved locations, and finally Community Anchor Institutions (CAIs), consistent with federal priorities. Applications were evaluated solely on Minimal BEAD Program Outlay—the lowest cost per Broadband Serviceable Location (BSL)—in alignment with the RPN's directive to focus on cost-effectiveness.

The BOTB Round resulted in comprehensive coverage across all 21 Project Funding Areas (PFAs), with at least 3 competitive Priority Broadband Project (PBP) proposals submitted for every BSL. This process achieved estimated program savings exceeding \$50 million compared to preliminary projections from the initial round, underscoring CNMI's commitment to responsible stewardship of federal funds.

While the BTOB successfully generated multiple competitive Priority Broadband Project (PBP) proposals for every BSL, BPD also received applications that, upon review, did not fully meet the stringent criteria for PBP designation. For all applications submitted by applicants seeking PBP status, BPD rigorously applied the PBP checklist methodology

detailed in Section 12.1 of this Final Proposal. This methodology ensured a project-area-specific assessment against criteria such as performance, scalability, reliability, resilience, and national security considerations. Any application that failed to satisfy every required item on this PBP checklist for a given Project Funding Area was consequently designated as a non-priority broadband project application. Given the robust competition among qualifying PBP proposals and BPD's commitment to prioritize PBPs, as well as the successful selection of the lowest-cost PBPs, it was not necessary to consider or award any non-priority broadband project applications in this selection round to achieve universal coverage within the CNMI.

**CNMI BEAD Subgrantee Selection Timeline**

<b>Event Description</b>	<b>Date</b>
Initial BEAD Subgrant Application Round Opens	March 31, 2025
Initial Application Round Closes	June 15, 2025
ULFW Provider Notice Posted on BPD Website	June 16, 2025
IP Correction Request Letter Sent to NTIA	June 16, 2025
ULFW Provider Deadline for Evidence Submittal	June 22, 2025
IP Correction Request Approved by NTIA	June 27, 2025
Benefit of the Bargain (BOTB) Round Opens	July 1, 2025
BOTB Round Closes	July 16, 2025
Review and Evaluation Completed	July 25, 2025
Subgrantee Selection Monitoring (SAC) Meeting	August 14, 2025
SAC Lifted (NTIA Satisfied with BPD SGS Process)	August 14, 2025
Provisional Subgrantees Notified	August 15, 2025

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

The Commonwealth of the Northern Mariana Islands (CNMI) Broadband Policy and Development (BPD) Office implemented a rigorous Subgrantee Selection Process (SGS) consistent with its approved Initial Proposal Volume II and fully aligned with the BEAD Restructuring Policy Notice (RPN). This process was designed to ensure a fair, open, and competitive award of BEAD funds to subgrantees deploying broadband infrastructure, prioritizing universal service to unserved and underserved locations.

Upon release of the RPN in June 2025, CNMI conducted a mandatory Benefit of the Bargain (BOTB) round—an additional subgrantee selection phase that permitted all applicants, regardless of prior participation or technology type, to compete on a level playing field free of eliminated non-statutory regulatory burdens. Existing qualified applicants were allowed to stand on their prior applications, which were rescored under an updated rubric excluding these burdens, while new or updated applications were accepted during the BOTB round. Prequalification was reopened to all interested entities; however, previously qualified applicants were not required to resubmit qualification materials.

### **Measures to Ensure Fairness**

BPD's SGS process was grounded in strict adherence to CNMI policies and internal controls designed to safeguard the integrity of the selection process.

BPD directly managed the review of all subgrant applications, leveraging its staff's deep expertise and intimate knowledge of the BEAD program. BPD personnel possess the necessary technical, managerial, and programmatic qualifications to conduct thorough and fair evaluations.

Consistent with the BEAD Restructuring Policy Notice (RPN), BPD employed the simplified, black-and-white scoring rubric mandated by the RPN. This streamlined rubric eliminated previous ambiguities and non-statutory regulatory burdens, enabling clear, objective comparisons based primarily

on Minimal BEAD Program Outlay—the lowest cost to deploy broadband per location.

Because the RPN scoring system is straightforward and unambiguous, all potential subgrantees who submitted complete applications for any Project Funding Area (PFA) were accepted for review. Importantly, no applicant who completed an application for a PFA was rejected outright. Instead, every qualifying element of each application was carefully evaluated.

Each of the 21 PFAs received multiple applications from diverse potential subgrantees, ensuring robust competition. The BPD reviewed these applications to determine whether they met the statutory definition of a Priority Broadband Project as part of its evaluation. Multiple applications from various potential subgrantees were determined to meet the definition of Priority Broadband Project for each PFA.

Given that the RPN scoring effectively removed scoring ambiguity, BPD was able to select preliminary awardees for each PFA simply by comparing the total BEAD funding outlay required by each proposal. The lowest-cost proposal among the Priority Broadband Project applications was designated the preliminary winner for its respective PFA.

This approach fostered absolute fairness by:

- Treating every completed application, regardless of technology, as eligible for consideration,
- Applying consistent, transparent scoring criteria uniformly across all applications,
- Leveraging BPD staff expertise to objectively evaluate all qualifying elements,
- Ensuring multiple competitive Priority Broadband Project applications per PFA,
- And basing awards primarily on cost-effectiveness as required by the RPN.

Thus, CNMI's SGS process guaranteed a fair environment where all serious applicants had equal opportunity to compete and be selected based solely on merit and cost efficiency.

### **Ensuring an Open Process**

Broad outreach efforts by BPD, including personalized email notifications, press releases, demonstrations at weekly stakeholder meetings, webinars, and social media campaigns, generated significant interest and resulted in multiple competitive applications for every PFA. This maximized participation across all eligible provider types. Given the strong competition, secondary scoring criteria were ultimately unnecessary because applications in each PFA were within 15% of each other, allowing for selection based solely on the primary criterion of Minimal BEAD Program Outlay.

The application period for the BOTB round was set at 15 calendar days—balanced to provide sufficient time for preparation while maintaining program momentum. Application deadlines were uniformly applied without undue extensions except for rare, justified cases with clear public communication. All potential subgrantees were informed that BPD would liberally apply extensions as needed if requested. No extension was requested during the BOTB.

### **Promoting Competitiveness**

The SGS process was designed to foster genuine competition among all eligible providers:

- No provider types—including cooperatives, nonprofits, utilities, private companies, or public-private partnerships—were excluded from eligibility, consistent with 47 U.S.C. § 1702(h)(1)(A)(iii).
- Scoring criteria were competitively neutral, focusing primarily on Minimal BEAD Program Outlay (lowest cost per location). Use of secondary scoring criteria was not needed for any PFA.
- Provider-specific outreach occurred only after initial application rounds to avoid unfair advantage.
- All applicants had equal opportunity to cure application deficiencies during a standardized cure period.
- Transparent communication of project deconfliction procedures was provided to applicants.

### **Reviewer Qualification and Objectivity**

BPD relied primarily on its expert and knowledgeable staff to conduct application reviews. BPD staff possess comprehensive expertise in

broadband program management, technical network design, financial analysis, and regulatory compliance specific to the BEAD program. Their deep familiarity with the program’s goals, requirements, and the unique challenges of broadband deployment in CNMI ensured high-quality, consistent, and objective evaluations.

To maintain fairness and impartiality, the BPD implemented internal controls including:

- Mandatory disclosure and management of any potential conflicts of interest to prevent real or perceived bias.
- Documentation of scoring for each application to provide transparent justification for decisions.
- Oversight by BPD leadership to monitor reviewer performance and uphold evaluation consistency.

By leveraging its in-house technical and managerial knowledge, BPD ensured that all applications were reviewed thoroughly and objectively under the simplified BEAD Restructuring Policy Notice (RPN) rubric, supporting a fair and equitable subgrantee selection process.

### **Summary**

BPD’s Subgrantee Selection Process embodies transparency, fairness, openness, and competitiveness as mandated by NTIA’s BEAD program requirements and the BEAD Restructuring Policy Notice. The process was designed and executed to maximize participation across all eligible provider types while rigorously evaluating applications against objective criteria. Strict safeguards against collusion, bias, conflicts of interest, and arbitrary decision-making were embedded throughout. NTIA provided oversight throughout the process, including conducting a **Subgrantee Selection Monitoring Meeting with BPD on August 14, 2025**, which culminated in NTIA authorizing the publication of the provisionally selected subgrantees. This monitoring ensured alignment with BEAD program requirements and the RPN. These measures collectively ensure that the allocation of BEAD funds will result in effective broadband deployment across all unserved and underserved locations in CNMI, delivering maximum benefit to residents.

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

BPD certifies that applications were received for every Project Funding Area (PFA) and every Broadband Serviceable Location (BSL) identified in the NTIA-approved list of eligible locations. Consequently, there were no unserved or underserved locations for which no applications were submitted during the Subgrantee Selection Process.

#### **Affirmation of Consistency with Approved Process**

Given the comprehensive participation by potential subgrantees across all 21 PFAs and associated BSLs, BPD did not need to invoke procedures related to areas lacking applications. This outcome reflects the effectiveness of the BPD's extensive outreach efforts, clear communication of program requirements, and transparent application process.

BPD confirms that this result aligns fully with the process approved in its Initial Proposal and modified by the BEAD Restructuring Policy Notice (RPN), fulfilling the program's universal coverage goals.

#### **Ongoing Oversight**

While no locations lacked applications during this Subgrantee Selection Process, BPD remains vigilant and prepared to implement contingency measures consistent with its approved policies should any gaps in coverage occur going forward. The BPD is committed to ensuring that all unserved and underserved locations ultimately receive broadband service through BEAD funding.

- 1.4. **Text Box:** If applicable, describe the Eligible Entity's methodology for revising its eligible CAI list to conform with Section 4 of the BEAD Restructuring Policy Notice.

BPD did not revise its list of eligible Community Anchor Institutions (CAIs) for the Final Proposal submission. Instead, the Commonwealth of the Northern

Mariana Islands (CNMI) Broadband Policy and Development (BPD) Office adopted an integrated approach, treating CAIs as essential Broadband Serviceable Locations (BSLs) within the broader deployment strategy.

Initially, all eligible CAIs in the CNMI had Location IDs and were included within the general BSL listings for all Project Funding Areas (PFAs), reflecting their critical role in community access. Traditionally, if any broadband service was available to these CAIs, it often amounted to mass-market offerings. The overarching strategy for the CNMI has always been to ensure comprehensive, equitable coverage for all unserved and underserved locations, and CAIs are an integral part of this universal service commitment.

The Benefit of the Bargain (BOTB) Round for subgrantee selection proved highly successful in generating competitive proposals. The preliminary selected deployments from this round demonstrated a robust capability to serve CAIs with high-speed symmetrical broadband, with **proposals offering speeds up to 5Gbps symmetrical**. This significantly exceeds the BEAD Program's requirement for CAIs to have service at not less than 1 Gigabit per second for both downloads and uploads.

Given these comprehensive and high-capacity proposals, there was no need to extract CAI locations for a separate CAI-specific PFA round or to create distinct project allocations solely for CAIs. Consequently, **all NTIA-approved CAIs in the CNMI will be fully served via the existing BOTB Subgrant Awardee deployment**. For the purposes of the CNMI BEAD Program, CAIs are considered BSLs and are being served with the same allocation of grant funds as the deployment of broadband networks to unserved and underserved locations. Therefore, while there is no CNMI submitted CAI CSV file, these institutions are indeed covered within the broader BSL deployment projects, adhering to the BEAD prioritization framework (unserved, then underserved, then CAIs) by ensuring their inclusion and high-speed service through the primary deployment efforts.

This approach ensures consistency with NTIA requirements and reflects an inclusive method for broadband deployment, aligning with federal guidelines and the CNMI's specific broadband equity priorities.

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

Yes.

## 2. NO CONTENT

## 3. TIMELINE FOR IMPLEMENTATION (REQUIREMENT 3)

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

BPD affirms its commitment to ensuring that all subgrantees begin providing broadband services to all customers desiring service within their project areas no later than four (4) years from the date of subgrant award. In addition, all BEAD-funded deployment activities will be completed at least 120 days before the end of CNMI’s overall period of performance, in compliance with 2 C.F.R. § 200.344.

Subgrant agreements include explicit project milestones with associated deadlines. Payments to subgrantees will be contingent upon achieving these milestones through fixed-amount subaward structure. This ensures financial incentives are aligned with timely deployment and service initiation. BPD will establish enforceable milestones tied to funding disbursement and project progress as outlined below:

<b>Milestone</b>	<b>Payment (% of Award)</b>	<b>Cumulative Payment (%)</b>
BPD approval of detailed project budget and upon signing of subgrant agreement	10%	10%
Completion of 10% of Project Broadband Serviceable Locations (BSLs)	10%	20%
Completion of 35% of Project BSLs	15%	35%
Completion of 60% of Project BSLs	15%	50%
Completion of 85% of Project BSLs	15%	65%
Final project completion and BPD approval	35%	100%

**Payment and Enforcement Mechanisms**

- Funding for all deployment projects will be distributed on a fixed-amount subaward basis, contingent upon verified completion of each milestone.
- BPD reserves the right to withhold payments if subgrantees fail to meet milestone requirements or other contractual obligations.
- Robust clawback provisions are included in subaward agreements to recoup funds disbursed for unmet obligations, including deployment deadlines and service commitments.

**Monitoring and Reporting**

- Subgrantees will submit detailed semiannual reports documenting deployment progress, adherence to technical standards, and financial expenditures.
- BPD staff will conduct regular performance reviews, including desk audits and site visits where practical, to verify reported progress and ensure quality standards.
- A dedicated subgrantee monitoring team will provide ongoing technical assistance and capacity building to address challenges and maintain schedule adherence.

### **Risk Management and Contingency Planning**

Recognizing CNMI's vulnerability to natural disasters such as typhoons, as well as supply chain and permitting risks, all subgrantees are required to develop comprehensive risk management plans. These plans must:

- Identify potential deployment obstacles and mitigation strategies.
- Include contingency measures to minimize impacts on project timelines.
- Be reviewed periodically by BPD and updated as necessary.

### **Capacity Building and Workforce Development**

To support successful deployment, BPD will work with subgrantees to ensure adequate local workforce availability. Technical support and training resources will be offered throughout the project lifecycle to strengthen implementation capacity. Utilization of individuals trained during the Governor's Broadband Bootcamp will be requested of subgrantees.

### **Commitment to Universal Service**

By combining contractual rigor, active monitoring, responsive support, and enforcement authority, BPD is confident that each subgrantee will meet the BEAD program's stringent timeline requirements. This approach supports CNMI's overarching goal of delivering reliable, high-speed broadband service universally across all PFAs within the prescribed four-year deployment window.

## 4. OVERSIGHT AND ACCOUNTABILITY PROCESSES (REQUIREMENT 4)

- 4.1. **Question (Y/N):** Does the Eligible Entity have a public waste, fraud, and abuse hotline, and a plan to publicize the contact information for this hotline?

Yes. OAG Hotline: 670-237-7630 / <https://www.cnmioag.org/hotline/>

- 4.2. **Attachments:** Upload the following two required documents:

- (1) BEAD program monitoring plan;
- (2) Agency policy documentation which includes the following practices:
  - a. Distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize) or on a basis determined by the terms and conditions of a fixed amount subaward agreement; and
  - b. Timely subgrantee (to Eligible Entity) reporting mandates.

1) See attached - **CNMI BPD BEAD Program Monitoring Plan.pdf**

2) Agency Policy Documentation

See attached – **Draft CNMI BEAD Program Subgrant Agreement Ver 1.pdf**

BPD implements a comprehensive monitoring and oversight framework to ensure effective stewardship of BEAD funds and compliance with all program requirements, consistent with the terms outlined in the CNMI BEAD Subgrant Agreement.

- 4.3. **Question (Y/N):** Certify that the subgrant agreements will include, at a minimum, the following conditions:
- a. Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;

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

Yes. BPD certifies that its subgrant agreements will include, at a minimum, all required conditions to comply with the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, and applicable federal regulations.

## 5. LOCAL COORDINATION (REQUIREMENT 5)

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

BPD is dedicated to transparent, inclusive, and collaborative local coordination to ensure the successful deployment of BEAD-funded broadband infrastructure.

**Public Comment Period:** The public comment period for CNMI’s BPD BEAD Final Proposal commenced on **August 16, 2025**, and concluded on **August 23, 2025 (ChST)**, providing a duration of **no less than 7 days** as required. All stakeholders, including political subdivisions, were afforded an opportunity to submit comments via the website form, phone and email, with the Draft Final Proposal posted publicly at <https://bpd.cnmi.gov> for review.

**Summary of Comments Received:** The Eligible Entity received **25 comments** during the public comment period. All comments, with the exception of one, were in strong support of the Draft Final Proposal and the provisional subgrant selections.

- **Strong Support for Buried Fiber and the Provisional Subgrant (PS) Selection:** Numerous residents and stakeholders expressed **overwhelming support** for the selection of buried infrastructure and the provisional award. Key reasons for support included:
  - **Typhoon-Resistant/Resilient Network:** Many highlighted the critical need for a "typhoon resistant" or "typhoon-proof" network due to the CNMI’s vulnerability to natural disasters. They cited IT&E’s proven reliability during past typhoons (Soudelor, Yutu, Mawar) where its buried DSL networks maintained service, unlike other aerial networks that experienced extended outages. The CNMI faces a unique challenge, with 100% of its locations lacking sufficient broadband access, making BEAD-funded connections essential for universal availability by 2030, a "whole-of-territory transformation".
  - **Economic and Social Benefits:** Supporting comments emphasized expected **job creation** for local talent, enhanced **public safety** through improved communications, better access to **telehealth and**

**distance learning**, and overall positive impacts on **economic development** and future growth. This advanced network is seen as an opportunity to provide future generations with global connectivity while living in the Marianas.

- **No Cost to Taxpayers:** Many comments noted that the program would be funded without burdening CNMI taxpayers.
- **Provisional Subgrantee (PS) Experience and Reliability:** Several comments praised IT&E's consistent reliability, strong connectivity, and proven track record with buried installation, noting their long-standing presence and previous work with buried telephone and DSL infrastructure.
- **Concerns from Unawarded Applicant (UA):** UA submitted comments raising concerns, primarily questioning the selection process and cost-effectiveness. They felt that the BPD disregarded the June 6, 2025 BEAD Restructuring Policy Notice (RPN), which emphasized a technology-neutral approach and lowest total cost per location as the primary criterion for funding. They also criticized the draft proposal documents for being "difficult to follow," with awardees identified only by UEI numbers (*fp\_deployment\_projects.csv*), and a perceived lack of independent evaluation.

**How Comments Were Addressed:** The CNMI BPD Final Proposal (v2.0) incorporates public comments where warranted. The Eligible Entity confirms the subgrantee selection process—including the Benefit of the Bargain (BOTB) Round—followed NTIA-approved methodology as updated by the BEAD Restructuring Policy Notice (RPN), emphasizing Minimal BEAD Program Outlay (lowest cost per Broadband Serviceable Location).

**BPD strengthened Requirement 12 to clearly explain the Priority Broadband Project (PBP) methodology**, detailing evaluation for

performance, scalability, reliability, and national security, and selection of the lowest BEAD Outlay among qualifying PBPs. Prioritizing fully buried, resilient networks aligns with the RPN’s allowance for geography-specific solutions in typhoon-prone environments like the CNMI. In each PFA, the selected 100% buried proposals were the lowest-cost among three qualifying buried applications; Provisional Subgrantee applications totaling \$31.4M total was well below the others (~\$60M and UA’s totaling ~\$90M).

To ensure fairness, BPD used internal expertise, consulted external experts, and required PE-certified network designs and costs. Broad outreach produced multiple competitive applications in every PFA. Secondary scoring was unnecessary because applications in each PFA were within 15% of each other. NTIA reviewed the process during a Subgrantee Selection Monitoring Meeting on August 14, 2025, and authorized publishing the provisionally selected subgrantees.

## 6. CHALLENGE PROCESS RESULTS (REQUIREMENT 6)

- 6.1. **Question (Y/N):** Certify that the Eligible Entity has successfully completed the BEAD Challenge Process and received approval of the results from NTIA.

Yes.

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

<https://bpd.cnmi.gov/storage/2024/08/1Approved-CNMI-Broadband-Serviceable-Locations-List.xlsx> Publicly posted on August 15, 2024.

## 7. UNSERVED AND UNDERSERVED LOCATIONS (REQUIREMENT 7)

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

Yes. BPD certifies that there is, for every unserved location, either a BEAD project or an appropriate reason code for not serving a location through a BEAD project.

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

Not Applicable.

- 7.3. **Attachment (Optional):** If applicable to support the Eligible Entity's response to Question 7.2, provide relevant files supporting the Eligible Entity's determination.

Not Applicable.

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

Yes. BPD certifies that there is, for every underserved location, either a BEAD project or an appropriate reason code for not serving a location through a BEAD project.

7.5. **Text Box ( ):** If the Eligible Entity does not serve an underserved location because it is either financially incapable or has determined the costs to serve the location would be unreasonable excessive. explain and include a strong showing of how the Eligible Entity made that determination.

Not Applicable.

7.6. **Attachment (Optional):** If applicable to support the Eligible Entity's response to Question 7.5, provide relevant files supporting the Eligible Entity's determination.

Not Applicable.

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

Yes.

7.8. NO CONTENT

7.9. NO CONTENT

7.10. **Question (Y/N):** Certify that the Eligible Entity has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that the Eligible Entity was notified of and did not object to, and/or federally-funded awards for which the Eligible Entity has discretion

over where they are spent (e.g., regional commission funding or Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects.

Yes. BPD certifies that it has used NTIA reason codes to document all unserved and underserved locations not funded by BEAD. Reason codes 1, 2, and 3 will be applied consistently during the program.

Supporting documentation for these determinations is maintained in accordance with NTIA guidelines and will be provided upon request. The list of excluded locations with reason codes is included in the attached fp\_no\_BEAD\_locations.csv file.

## 8. NO CONTENT

## 9. NO CONTENT

## 10. NO CONTENT

## 11. IMPLEMENTATION STATUS OF PLANS FOR COST AND BARRIER REDUCTION, COMPLIANCE WITH LABOR LAWS, LOW-COST PLANS, AND NETWORK RELIABILITY AND RESILIENCE (REQUIREMENT 11)

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

BPD’s implementation plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment are currently **“In Progress”**. The Commonwealth of the Northern Mariana Islands (CNMI) Broadband Policy and Development (BPD) Office has taken several concrete actions and continues to make significant progress on these critical initiatives, aligning with both its Initial Proposal commitments and NTIA’s directives for efficient program implementation.

Key initiatives and their current status include:

- **One-Start Permitting Process:** The CNMI already has a streamlined One-Start Permitting Process in place for land-clearing permits. This process routes applications to various regulatory agencies, such as the Bureau of Environmental and Coastal Quality (DEQ), Division of Coastal Resources Management (CRM), Historic Preservation Office (HPO), and Department of Fish and Wildlife (DFW), as well as their federal counterparts, to ensure efficiency and timely review. Subgrantees are actively encouraged to utilize this process. The subgrant agreement draft also specifies that subgrantees must provide copies of all required permits (including those obtained via the CNMI One-Start process or other relevant CNMI/federal agencies) before BPD issues a Notice to Proceed with Construction (NTPC).
- **Developing Standardized Pole Attachment Agreements:** BPD continues to work on drafting standardized pole attachment agreements. The aim is to have these templates ready by Q4 2025 to expedite negotiations and approvals for attaching equipment to existing poles. In-kind contributions such as waiver of fees associated with pole attachments are allowable as matching funds.
- **Establishing a One-Stop Shop for Access Requests:** Progress is underway to create an online portal for access requests by Q2 2026. This portal will serve as a single point of submission for pole attachments, conduit use, and easement access, thereby streamlining the application process, enhancing transparency, and reducing administrative delays.
- **Adopting Dig-Once Policies:** BPD has drafted a policy proposal for dig-once policies and is working with CNMI lawmakers, with the goal of having it legislated and in effect by Q2 2026. This policy aims to ensure future construction is efficient and non-disruptive through concurrent installations.

- **Further Streamlining Permitting Processes:** A comprehensive review of current permitting processes is underway, with the aim to introduce an integrated online permitting system with dashboards and standardized templates, developed in collaboration with permitting agencies, to expedite reviews and approvals.
- **Streamlining Cost-Effective Access to Poles, Conduits, Easements:** Negotiations are ongoing for bulk-access agreements with the utility and private owners. This will enable subgrant awardees to secure necessary infrastructure access at reduced rates. In-kind contributions, such as the waiver of fees for access to conduits and easements, can count towards matching funds.
- **Simplifying Rights of Way and Imposing Reasonable Access Requirements:** BPD is working on revising current rights-of-way guidelines to remove ambiguities and streamline the application process. A clear framework outlining reasonable access requirements designed to accelerate deployment while balancing stakeholder interests. The waiver of fees associated with rights of way is an allowable in-kind contribution for matching funds.

**New Actions and Progress:**

To further enhance and accelerate these efforts, BPD has undertaken the following additional actions:

- **RFP for EHP Permitting Firm Issued:** The CNMI has issued a Request for Proposals (RFP) for a qualified Environmental and Historic Preservation (EHP) Permitting Firm. This firm will provide specialized EHP Permitting services, including reviewing documentation, conducting surveys and studies, and preparing analyses for compliance with environmental laws and regulations. The scope includes supporting the National Historic Preservation Act (NHPA) Section 106 review process, Waters of the US (WOTUS)/Wetlands compliance, Coastal Zone Management Act (CZMA) requirements, and consultations under the Magnuson-Stevens Fishery Conservation and Management Act. The firm will also evaluate relevant FirstNet Programmatic Environmental Impact Statement (PEIS) chapters and develop supplemental Environmental Assessments (EA) or Environmental Impact Statements (EIS) if necessary. The evaluation criteria for the RFP emphasize technical regulatory expertise, CNMI

experience in biological and cultural resources, project approach, team qualifications, and cost-effectiveness, with the explicit hope that this will streamline costs and expedite the permitting process. This aligns with NTIA's goal of leveraging expert assistance to reduce National Environmental Policy Act (NEPA) processing time and expedite approvals. Subgrantees are obligated to cooperate with BPD and relevant agencies in completing EHP reviews and must receive an NTPC from BPD before commencing construction or ground-disturbing activities.

- **EHP Permitting Liaison Hired:** BPD has hired an EHP Permitting Liaison. This dedicated liaison will facilitate and manage the complex interactions between subgrantees, various CNMI government permitting agencies, relevant federal agencies, and the newly retained EHP Permitting Firm. The liaison's role is to ensure smoother coordination and resolution of permitting challenges, further contributing to the timely and cost-effective deployment of broadband infrastructure.

These comprehensive measures, including existing frameworks and newly initiated actions, demonstrate BPD's proactive approach to reducing operational costs and removing barriers towards efficient broadband deployment, thereby ensuring compliance with environmental requirements while expediting project timelines. The use of NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) within the NTIA Grants Portal will also be a core component of EHP compliance, as required by NTIA to expedite NEPA reviews and track subrecipient NEPA milestone schedules.

**11.2. Question (Y/N):** Affirm that the Eligible Entity required subgrantees to certify compliance with existing federal labor and employment laws.

Yes.

**11.3. Text Box (Optional – Conditional on a 'No' Response to Intake Question 11.2):** If the Eligible Entity does not affirm that subgrantees were required to certify compliance with federal labor and employment laws, explain why the Eligible Entity was unable to do so.

Not Applicable.

11.4. **Question (Y/N):** Certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.

Yes.

11.5. **Text Box (Optional – Conditional on a ‘No’ Response to Intake Question 11.4):** If the Eligible Entity does not certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period, explain why the Eligible Entity was unable to do so.

Not Applicable.

11.6. **Question (Y/N):** Certify that all subgrantees have planned for the reliability and resilience of BEAD-funded networks.

Yes.

11.7. **Text Box (Optional – Conditional on a ‘No’ Response to Intake Question 11.6):** If the Eligible Entity does not certify that subgrantees have ensured planned for the reliability and resilience of BEAD-funded networks in their network designs, explain why the Eligible Entity was unable to do so.

Not Applicable.

## 12. SUBSTANTIATION OF PRIORITY BROADBAND PROJECTS (REQUIREMENT 12)

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

### **Application of the Priority Broadband Project Definition**

The Commonwealth of the Northern Mariana Islands (CNMI) Broadband Policy and Development (BPD) Office has rigorously and transparently applied the definition of Priority Broadband Projects (PBPs) as established by the Infrastructure Investment and Jobs Act (IIJA) and further clarified by the National Telecommunications and Information Administration’s (NTIA) BEAD Restructuring Policy Notice (RPN) dated June 6, 2025. This methodology ensures a detailed, project-area-specific assessment that prioritizes efficient use of BEAD funds to achieve universal broadband access throughout all CNMI Project Funding Areas (PFAs).

### **CNMI’s Unique Context Elevating PBP Importance**

CNMI’s broadband deployment context is uniquely significant and makes PBP decisions decisive. Unlike any other U.S. jurisdiction, 100% of the Commonwealth’s Broadband Serviceable Locations (BSLs) are classified as unserved or underserved under BEAD criteria, meaning every location potentially requires a BEAD funded deployment. The CNMI’s plan anticipates BEAD-funded connections for all BSLs, targeting universal broadband availability by 2030—a whole-of-territory transformation rather than incremental expansion.

Furthermore, CNMI’s strategic location as the westernmost U.S. frontier in the Pacific, closer to China than the US mainland, further elevates national security, reliability and resilience requirements. Networks must be engineered to withstand cyber threats, natural hazards (such as typhoons, flooding, and extreme winds), and supply chain disruptions, using trusted vendors and robust operational practices. These factors underscore the critical need for all selected projects to fully embody the statutory PBP criteria. When analyzing subgrant applications in each PFA to determine PBP status, BPD had to ensure performance, scalable capacity, security, disaster resilience and reliability. When executed well, the CNMI BEAD program will deliver durable benefits across the CNMI and have a major positive effect on economic development, digital development, community connectivity, public safety, and national security.

### **Methodology for Determining PBPs – Aligned with RPN and Volume II Intent**

BPD employed a comprehensive process evaluating each subgrant proposal on a PFA-by-PFA basis, recognizing geographic and technological variations.

BPD's methodology for determining PBP status for each project application was a per-PFA pass/fail checklist, derived directly from the IJA and the RPN, while preserving the strong preference for resilient, hardened networks emphasized in CNMI's Initial Proposal Volume II. This approach ensured technology neutrality, as mandated by the RPN, meaning no technology was categorically excluded. Instead, all technologies (fiber-optic, HFC, LEO satellite services, and terrestrial fixed wireless, including licensed, unlicensed, or hybrid spectrum) were evaluated against the statutory PBP criteria for each specific project area.

Applicants were required to submit comprehensive documentation within each PFA application section of the CNMI BEAD Subgrant Application Portal to support their claim for PBP classification. Self-certification alone was insufficient.

Those deemed as non-priority broadband project applications remained eligible for later consideration within the same PFA if (a) no qualifying PBP existed after evaluation, or (b) the qualifying PBP(s) were determined to be excessive cost under BEAD rules.

**NOTE:** After applying PBP Checklist to all applications received in each PFA from the BOTB round, BPD identified at least three applications that met the definition of PBP in each PFA. These candidate PBPs were then scored using the RPN Scoring rubric as follows: among the qualifying PBP candidates in each PFA, BPD scored them based on requested BEAD Outlay. The application with the lowest BEAD Outlay (cost) was identified as the preliminary subgrantee for that PFA. *No PFA selection resulted in another PBP application that was within 15% of the BEAD Outlay request of another PBP application, therefore no secondary criteria were needed.*

#### **BPD PBP Checklist (per PFA)**

- ✓ Performance  
Applicants were required to provide PE-certified network designs, capacity calculations, and representative speed/latency modeling.

- Minimum speeds of 100 Mbps download / 20 Mbps upload.
- Latency not exceeding 100 milliseconds.
- Consistent service quality and network reliability.
- ✓ Scalability
  - Networks must demonstrate scalability to meet evolving demands over the next decade, including support for 5G, successor wireless technologies, and advanced services.
  - Consideration of projected connectivity needs over the next decade.
- ✓ Reliability
 

Despite removal of some non-statutory climate mandates by the RPN, statutory obligations still require reliability and resilience from storms, disasters, environment, geography, vegetation density, power needs, etc. This critical criterion, a cornerstone of CNMI’s Volume II commitments, required detailed documentation on how the proposed network would ensure consistent and reliable service quality, mitigate interference, capacity constraints, and withstand and recover from harsh climate conditions common in the CNMI, such as typhoons, flooding, and extreme winds. This included detailed documentation on:

  - Technical architecture, ensuring consistent and reliable service.
  - Strategies to mitigate interference and capacity constraints.
  - How simultaneous throughput would be maintained.
  - Disaster recovery and preventative maintenance plans (required prior to network operation).
  - Use of climate-hardened underground fiber deployment, redundant fiber rings, and diverse landing points where appropriate for CNMI’s specific environment.
  - For example, a proposal using Hybrid Fiber-Coaxial (HFC) technology that was submitted for PFA CNMI-R1 (Rota 1) may have met speed and latency but failed the Reliability/Resilience checklist item because aerial last-

mile exposure and heavy dependence on powered active components made sustained performance under prolonged typhoon-driven power outages infeasible for CNMI. This project was therefore not advanced as a qualifying PBP for that PFA.

- ✓ National security considerations:  
Projects were evaluated for adherence to national security considerations, including the use of trusted vendors and robust Supply Chain Risk Management (SCRM) practices.

**Subgrant Portal PBP Section:** Within each PFA Application section of the CNMI BEAD Subgrant Application Portal, each applicant had to submit documentation to have their application considered as a PBP. Each applicant was required to upload documents as follows:

**[FROM BPD BOTB SUBGRANT PORTAL]:**

***Priority Broadband Project Qualification (Per PFA) \****

***Upload the Following Document:***

*Detailed supporting documentation demonstrating how your proposed project qualifies as a Priority Broadband Project as defined under the BEAD Program requirements and meets ALL of the following statutory criteria:*

***Criteria:***

***1. Speed and Latency Requirements***

- *Demonstrate that your proposed network will provide broadband service with minimum speeds of 100 Mbps download and 20 Mbps upload, with latency of 100 milliseconds or less.*

***2. Scalability***

- *Provide a clear plan showing how the network can easily scale over time to meet evolving connectivity needs of households and businesses, including but not limited to:*

- i. Upgrading speeds well beyond the minimum 100/20 Mbps standard within the next 5–10 years.*
- ii. Supporting deployment of 5G, successor wireless technologies, and other advanced services.*
- iii. For fixed wireless applicants, include plans for fiber backhaul or other infrastructure investments necessary to ensure scalability.*

### **3. Network Architecture, Design, and Resilience**

- *Describe the technical architecture of your network, including:
  - i. How you will ensure consistent and reliable service quality across all proposed locations.*
  - ii. Strategies to mitigate interference (especially for unlicensed fixed wireless applicants), capacity constraints, and environmental challenges specific to CNMI’s geography.*
  - iii. How simultaneous throughput will be maintained for all connected users in the project area.**
- *Demonstrate network resilience by providing detailed documentation on how your proposed network will withstand and recover from harsh climate conditions common in the CNMI, such as typhoons, flooding, and extreme winds.*

### **4. Business and Community Needs**

- *Demonstrate how your project will support both residential and business customers with symmetrical bandwidth capabilities where applicable.*
- *Explain how your deployment aligns with CNMI’s community development and economic growth plans, including potential support for AI data centers, IoT networks, industry-specific needs, and critical government or emergency services.*

### **5. Business and Community Needs**

- *Attach any relevant engineering reports, financial statements, network diagrams, vendor commitments, climate-resilience assessments, disaster recovery plans, or other documentation supporting your claims.*

#### **Note to Applicants**

*The CNMI BEAD Program will rigorously evaluate these materials. Self-certification alone is insufficient. Failure to provide adequate supporting evidence—including climate resilience measures—may result in your application not being considered a Priority Broadband Project. Projects not meeting these criteria may still be considered for funding as non-priority broadband projects if they meet the minimum speed and latency standards.*

#### **Detailed Approach to Network Reliability and Resilience via Priority Broadband Project (PBP) Assessment**

Additional support for a hardened, resilient, and reliable network, specifically addressing power issues, including historical storm-related outages and the ongoing challenge of consistent power supply in the CNMI.

The Commonwealth of the Northern Mariana Islands (CNMI) Broadband Policy and Development (BPD) Office has ensured that all subgrantees have meticulously planned for the **reliability and resilience of BEAD-funded networks**. This commitment is deeply embedded in CNMI's unique geographic and environmental context, where **100% of Broadband Serviceable Locations (BSLs) are classified as unserved or underserved**, necessitating a "whole-of-territory transformation" to achieve universal broadband availability. As a **typhoon-prone region** and the westernmost U.S. frontier in the Pacific, CNMI's strategic location elevates national security, reliability, and resilience requirements for all proposed networks.

While the BEAD Restructuring Policy Notice (RPN) eliminated some non-statutory climate mandates from the Notice of Funding Opportunity (NOFO), the **statutory obligation for subgrantees to incorporate best practices for ensuring reliability and resilience of broadband infrastructure remains**. BPD enforces this through a rigorous, per-Project Funding Area (PFA) **Priority**

**Broadband Project (PBP) pass/fail checklist.** This approach ensures **technology neutrality** in access while maintaining rigor in PBP qualification and cost discipline in selection.

The "Reliability & Resilience" criterion within the PBP checklist is a cornerstone of CNMI's subgrantee selection process. Specifically, applicants must demonstrate:

- **Climate-Hardened Routing and Network Architecture:** How the proposed network will reliably deliver services and **withstand and recover from harsh climate conditions common in the CNMI, such as typhoons, flooding, and extreme winds.**
- **Route Diversity and Hardened Infrastructure:** Plans for **redundant fiber rings, diverse landing points,** and the use of **hardened cabinets** to safeguard against threats and ensure continuous service.
- **Backup Power Strategy and Outage Management:** Comprehensive **backup power strategies,** including logistical plans for sustained operation during **extended power outages** (which are frequent in CNMI following typhoons).
- **Disaster Recovery and Preventative Maintenance:** Detailed **repair and restoration plans** following disruptions, and **preventative maintenance plans** to ensure network longevity and reliability (required prior to network operation).
- **Supplier Resilience Commitments:** Documentation of **supplier resilience commitments** to mitigate supply chain disruptions.

This rigorous assessment is crucial given CNMI's history with natural disasters and its inherent power infrastructure vulnerabilities. For instance, **Typhoon Soudelor (2015)** impacted Saipan directly, leaving the island without power for months, with **48 percent of the Saipan power grid inoperable** due to loss of power poles and downed lines. Full power restoration took months. Similarly, **Typhoon Mawar (2023),** described as the strongest typhoon to hit the islands since the 1960s, caused total loss of power, water, and fixed and mobile communications in Guam. Following Mawar, **over 70% of cell sites went offline,** and service restoration was stalled by pervasive **power and fuel issues.** Docomo Pacific, for example, required a waiver from the FCC due to **71% of its fixed network in Guam**

**being aerial, with over 60% damaged** by Mawar, rendering restoration difficult for sections served by aerial plant. This reliance on pole-mounted services for companies has consistently led to **extended outages after typhoons Soudelor (2015), Yutu (2018), and Mawar (2023)**.

Beyond these catastrophic events, the CNMI faces an **ongoing challenge in maintaining consistent power**, including periods of load shedding in recent years. This highlights that even in the absence of major typhoons, the power infrastructure can be unreliable, further necessitating hardened and resilient communication networks. Networks reliant on continuously powered active components or aerial infrastructure are particularly vulnerable to both immediate storm damage and prolonged recovery due to power outages, as well as daily operational power instabilities like load shedding.

In stark contrast to aerial networks, the existing buried wired networks consistently **maintained wireline services without disruption** during and after typhoons Soudelor, Yutu, and Mawar. This real-world experience underscores why **aerial networks are not considered a proven and reliable solution for typhoon-prone areas** with vulnerable power grids.

Recognizing these vulnerabilities, the Guam Power Authority (GPA) is seeking FEMA funding for a **\$6.4 billion project to move power lines underground**, estimating it would take 10-15 years to complete, to positively affect future recovery efforts after natural disasters and harden the grid against threats. Similarly, the CNMI Commonwealth Utilities Corporation (CUC) plans to install an **underground power distribution system** from power generating facilities to critical infrastructure, connecting Power Plant 1 to Power Plant 4 and the Commonwealth Health Center, and the Chalan Kiya substation to the airport. CUC's existing 34.5kV transmission power system is already underground.

BPD's PBP checklist directly addresses these vulnerabilities by prioritizing robust, climate-hardened infrastructure. For example, during the subgrantee selection process, a **Hybrid Fiber-Coaxial (HFC) proposal from a subgrant applicant for PFA CNMI-R1 (Rota 1) was classified as a non-PBP** because, despite perhaps meeting speed and scalability criteria, it **failed the Reliability/Resilience item**. This was due to its **aerial last-mile exposure**

**and heavy dependence on powered active components**, making sustained performance during prolonged typhoon-driven power outages and inherent power instability infeasible for CNMI's environment. This example illustrates that self-certification for PBP status is insufficient; applicants must provide adequate supporting evidence, including robust climate resilience measures.

Furthermore, subgrantees are required to establish **risk management plans that account for technology infrastructure reliability and resilience from natural disasters**, aligning with **NIST Framework for Improving Critical Infrastructure Cybersecurity (Version 1.1) and Executive Order 14028**, as well as **NISTIR 8276 and NIST 800-161** for supply chain risk management (SCRM). This comprehensive approach to PBP substantiation ensures that only projects delivering **durable, reliable, and survivable broadband networks** capable of meeting the long-term needs of CNMI's unique island environment and its power challenges are funded.

#### **Community Acknowledgement:**

The BPD's commitment to a hardened, resilient, and reliable network, particularly one that addresses the ongoing power issues in the CNMI, was strongly supported by public comments received during the CNMI BEAD Final Proposal public comment period. It is also strongly supported by statements from various company representatives in the telecommunications and utility sectors. These statements underscore the vulnerability of aerial infrastructure and the critical importance of underground and robust power solutions in a typhoon-prone region with inconsistent power.

Here are some quotes from company representatives that back up the BPD mindset:

#### **Acknowledgement of Aerial Network Vulnerabilities and the Need for Undergrounding/Hardening:**

- Christine Baleto, President & CEO of Docomo Pacific, Inc., expressed a commitment to strengthening the CNMI's digital infrastructure in a letter dated June 16, 2025. This letter, addressed to Mr. Glenn Hunter of the Broadband Policy & Development (BPD) Office, specifically requested the prioritization

of **underground fiber deployment to community anchor institutions**. In her remarks, Baletto stated: "**In light of the recent BEAD Restructuring Policy Notice issued on June 6, 2025, I am writing to urge the Broadband Policy & Development Office (BPD) to prioritize underground fiber deployment to the Commonwealth of the Northern Mariana Island's (CNMI) community anchor institutions as part of the BEAD planning and subgrant process.** As providers prepare to revalidate service eligibility under new BEAD technical standards, this is an important time to focus the CNMI's infrastructure investments on solutions that offer lasting resilience. Our schools, healthcare facilities, public safety agencies, and other essential services deserve hardened, reliable broadband—especially in a region frequently impacted by typhoons and other climate risks. Fixed wireless technologies can serve a role in bridging gaps, but underground fiber remains the gold standard for long-term stability, security, and performance—particularly in disaster-prone areas. To that end, we recommend that BPD: • Prioritize underground fiber buildout for institutions that provide critical services to the public. • Encourage coordination across utilities to reduce trenching costs and streamline deployment. • Ensure that BEAD-funded infrastructure planning supports both compliance and climate readiness. Docomo Pacific remains committed to supporting broadband expansion that meets today's needs while preparing for tomorrow's risks. **We appreciate your leadership and look forward to working together to ensure the CNMI's digital infrastructure is as strong and resilient as the communities it serves.**" This letter directly supports the BPD's mindset of building a hardened, resilient, and reliable network, particularly through underground fiber. The explicit subject of the letter further underscores Docomo Pacific's alignment with the BPD's focus on robust, disaster-resilient infrastructure.

- Following Typhoon Mawar on the neighbor island of Guam, **Docomo Pacific's CEO, Rod Boss, acknowledged the need for network improvements and a shift towards more resilient infrastructure.** He stated, "As we have been rebuilding the

damaged network, we have taken time to assess its overall design, the processes we use to provision services, and our customer care and communication protocols". More directly, Boss affirmed that "a little over 30 percent of Docomo's network is currently underground and the company aims at increasing that percentage". He further emphasized the move to more robust technology, saying, "**We will also be accelerating the deployment of fiber, which is more resilient than other transmission lines and provides the highest speeds and quality available today**". This indicates a direct recognition of the limitations of their current, presumably more aerial-reliant, network and a commitment to BPD's preferred hardened infrastructure. This acknowledgement is further highlighted by IT&E, which concurred with Boss's statements, noting that "Mr. Boss appears to have acknowledged the benefits of buried fiber networks; particularly in topographically diverse, typhoon-prone areas like Guam and the CNMI". IT&E also pointed out that Docomo "even submitted its own buried fiber proposal of \$90 plus million for the CNMI BEAD", demonstrating a concrete action aligned with this understanding.

#### **Proof of Resilience from Buried Infrastructure:**

- **IT&E, a telecommunications provider, consistently demonstrated the resilience of its buried network** during multiple catastrophic weather events. According to IT&E, "As the residences, businesses, and CAIs of the CNMI who were in the CNMI in one or more of the last three typhoons in 2015 (Soudelor), 2018 (Yutu), and 2023 (Mawar) experienced, **the IT&E wired network continued to provide service throughout the CNMI while the Docomo wired network and the CNMI commercial power options were compromised in many areas**". IT&E attributes this resilience to its long-standing strategy: "IT&E began the burial of their wired network in the CNMI over 20 years ago. They are continuing that approach with their proposal for fiber-to-the-home or fiber-to-the-business with their BEAD proposal. IT&E has a buried wired network that is typhoon-proven in a typhoon-prone region". This real-world evidence strongly supports the

BPD's preference for buried infrastructure as a reliable solution for the CNMI's challenging environment.

### **Intertwined Power and Network Resilience Issues:**

- Addressing the critical link between power stability and network resilience, a **GTA representative highlighted the impact of power system resilience, particularly for small islands**. The company stated, "**The greatest impact on network resilience can be achieved by enhancing power system resilience, especially in small islands that have limited power and resources. In the long run, we recommend the burial of power lines for key network infrastructure assets, such as cable landing stations, data centers, network operation centers, and important cell sites**". GTA also touted its own network's performance, stating, "With over 250 miles (of) secure underground fiber, we ensure unrivaled protection against harsh weather conditions. During Typhoon Marwar, our network infrastructure proved its resilience. Our core sites were equipped with backup generators and showing uninterrupted operations. Our cable landing stations and data centers remain fully operational without any disruptions". This directly aligns with the BPD's focus on power infrastructure as a key component of overall network reliability.
- **IT&E specifically called out the power dependency of certain broadband technologies:** "... cable-based DOCSIS4 solution is highly reliant on reliable commercial power throughout the network. **Fiber-based passive optical networks do not require commercial power. The IT&E solution includes options when commercial power is not available**". This statement underscores the critical power issues in the CNMI, including historical load shedding and potential future returns, and highlights how different network technologies inherently vary in their dependence on a consistent power supply, directly supporting the BPD's comprehensive approach to network reliability and resilience.

These statements from industry players reinforce the BPD's strategic direction, validating the necessity of prioritizing resilient, climate-hardened, and power-independent network designs, particularly through underground

fiber deployment, to ensure reliable communication in the face of natural disasters and ongoing power challenges in the CNMI.

### **Data Reporting**

All projects Selected as Preliminary Subgrant Awardees had been accurately recorded in the **fp\_deployment\_projects.csv** file in accordance with NTIA Guidance and had been posted for public comment period and have been submitted with this Final Proposal. This detailed and technology-neutral approach to PBP substantiation ensures that the CNMI is funding projects that are not only cost-effective but also durable, reliable, and capable of meeting the long-term broadband needs of its unique island environment, fully aligning with both the IJA and the BEAD RPN.

## **13. SUBGRANTEE SELECTION CERTIFICATION (REQUIREMENT 13)**

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

BPD's deployment Subgrantee Selection Process was conducted in full alignment with the methodologies approved in Volume II of the Initial Proposal, as modified by the BEAD Restructuring Policy Notice. Our process involved a rigorous application and evaluation framework designed to select the most cost-effective and impactful projects for broadband deployment across the Commonwealth.

### **Application of Scoring Criteria**

In determining the preliminary subgrant awards for last-mile broadband deployment projects, BPD exclusively applied the Minimal BEAD Program Outlay as the sole primary criterion, assigning it 100% importance. This approach was feasible because, for each Project Funding Area (PFA), BPD received at least three competitive Priority Broadband Project (PBP) proposals that met all other requirements and offered distinct cost structures, allowing for clear selection based solely on this primary criterion. The RPN emphasizes focusing on minimizing deployment costs.

The "Minimal BEAD Program Outlay" criterion was assessed based on:

- The total BEAD funding required to complete the project: This was calculated as the total project cost minus the applicant's proposed match.
- The cost to the Program per Broadband Serviceable Location (BSL) of the project: This was determined by dividing the total BEAD funding required by the number of BSLs the project would serve.
- The combination of proposals with the lowest overall cost to the Program: BPD evaluated proposals to ensure that the chosen combination resulted in the most efficient use of BEAD funds across all PFAs.

Applicants were required to provide binding cost proposals that encompassed all costs necessary for network deployment to the premises, including drops to the customer's door and any middle-mile infrastructure required to connect BSLs to an Internet Exchange Point (IXP) or point of aggregation. This ensured that the cost outlay was comprehensive and fixed. Applicants were also encouraged to include a contingency line item for future cost increases in their budget planning, as no additional funding would be provided once the award was made.

### **Exclusion of Secondary and Other Scoring Criteria**

Given the robust competition within each PFA, the application of the "Minimal BEAD Program Outlay" criterion consistently resulted in clear distinctions between proposals. There were no instances where competing proposals for the same general project area were within 15% of the lowest-cost proposal on a per-BSL basis. Therefore, BPD did not need to apply the secondary criteria: Speed to Deployment, Speed of Network and Other

Technical Capabilities, or Preliminary/Provisional Subgrantees. This aligns with NTIA's guidance, which grants Eligible Entities discretion in weighing secondary criteria, including assigning no weight if not necessary.

Furthermore, in accordance with the BEAD Restructuring Policy Notice, other criteria previously identified in the Notice of Funding Opportunity (NOFO), such as affordability, equitable workforce development and job quality, open access, and local coordination, were no longer considered as award selection criteria. Fair labor practices, while still a requirement, were satisfied through subgrantee self-certification of compliance with federal labor and employment laws, rather than being a scoring criterion.

The application of the "Minimal BEAD Program Outlay" as the primary scoring criterion allowed BPD to effectively differentiate between competing proposals and provisionally select subgrantees that offered the most fiscally responsible solutions for achieving universal broadband coverage.

## 14. ENVIRONMENTAL AND HISTORIC PRESERVATION (EHP) DOCUMENTATION (REQUIREMENT 14)

14.1. **Attachment (Required):** Submit a document which includes the following:

- Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's National Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.
- Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its

obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.

- Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/regional-programmatic-environmental-impact-statements>.
- Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.
- Description of the Eligible Entity’s plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

See Attachment: **CNMI BPD BEAD EHP Compliance Plan.pdf**

## 15. CONSENT FROM TRIBAL ENTITIES (REQUIREMENT 15)

### 15.1. **Attachment(s) (Required if any deployment project is on Tribal Lands):**

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

Not Applicable

## 16. PROHIBITION ON EXCLUDING PROVIDER TYPES (REQUIREMENT 16)

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

Yes.

## 17. WAIVERS

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

Not Applicable.

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

Not Applicable.