

Exhibit J: Project Completion Criteria

CNMI Broadband Equity, Access, and Deployment (BEAD) Program Subgrant Agreement between CNMI BPD and [Subgrantee Name]

Field	Detail
Project Name/Identifier	[Unique Name or Identifier from Exhibit A]
Subgrantee	[Full Legal Name of Subgrantee]
BPD Subgrant Award Identifier	[BPD Assigned ID]

Purpose: This Exhibit outlines the minimum criteria that must be met and verified for the Project to be considered complete and placed into service by CNMI BPD. Satisfying all applicable criteria listed below is mandatory before the Subgrantee can submit its formal written **Subaward Completion Certification**, request a final acceptance inspection, and achieve project closeout. Successful completion must enable BPD to meet its mandate to complete BEAD-funded subgrant activities at least **120 days** prior to the end of the Eligible Entity's Period of Performance.

Project Completion Checklist:

(A) Physical Construction & Network Infrastructure

The Subgrantee must confirm that the physical network construction is finished and aligns with the approved plans:

Status	Criterion	Alignment & Verification
[]	Full Physical Construction Completion	All physical construction activities described in Exhibit A (Scope of Work) and the approved final network design are fully completed.
[]	Design Consistency (PE Certified)	All network infrastructure and equipment have been installed exactly according to the final BPD-approved network design and diagrams, which were certified by a Professional Engineer (PE).

[]	CNMI Resilience Requirements Met	The deployed infrastructure complies with CNMI's Priority Broadband Project (PBP) commitments, including climate hardening and network architecture suitable for the island environment (e.g., underground prioritization).
[]	As-Built Documentation	Final "As-Built" network documentation, reflecting the completed infrastructure, has been prepared and submitted to BPD.
[]	Site Restoration	All project sites have been reasonably restored, and construction debris removed.

(B) Network Performance & Technical Readiness

The network must be tested, placed into service, and verified to meet federal performance standards:

Status	Criterion	Alignment & Verification
[]	Network Operational	The constructed network is fully operational, capable of transmitting fixed broadband internet access service, and has been placed into service.
[]	BSL Performance Standard Met	Network performance testing (speed, latency) demonstrates compliance with Qualifying Broadband Service standards: minimum 100 Mbps download and 20 Mbps upload speeds for all Broadband Serviceable Locations (BSLs), with latency $\leq 100 \text{ ms}$.
[]	CAI Performance Standard Met	Service provisioned to eligible Community Anchor Institutions (CAIs) meets the requirement of 1 Gbps symmetrical (upload/download).
[]	Required Testing Documentation	Performance testing records (speed, latency, reliability/availability) are submitted to BPD, confirming, at a minimum, the 80/80 standard .

(C) Service Obligations and Compliance

Status	Criterion	Alignment & Verification
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[]	Deployment Deadline Met	Project construction was completed, and the network was placed into service for all BSLs within the Project Funding Area not later than four (4) years after the date the subgrant was received.
[]	Installation Standard Met	Systems are in place to perform standard installations (initiation of service) within ten (10) business days of a customer request.
[]	Drop Cost Prohibition	Subgrantee certifies that no fees or charges were levied on subscribers for the extension of the network (drop costs) or required property modifications in connection with the installation of BEAD-funded services.
[]	LCSO Available	The approved Low-Cost Service Option (LCSO) is actively offered to eligible subscribers for the duration of the 10-year Federal Interest Period .
[]	Cybersecurity and SCRM	Subgrantee confirms continued adherence to the BPD-approved Cybersecurity Risk Management Plan and Supply Chain Risk Management (SCRM) Plan .

(D) Administrative & Financial Completion (Fixed Amount Subaward)

Status	Criterion	Alignment & Verification
[]	Final Milestone Achieved	The final fixed-amount milestone (e.g., 100% BSL completion and final approval) as defined in Exhibit S (Subgrant Milestones) has been successfully verified by BPD.
[]	Match Obligation Fulfillment	Final reconciliation confirms that the required Non-Federal Matching Funds (minimum 25%) proportional to the entire project cost have been fully expended, certified, and documented in accordance with 2 C.F.R. § 200.306.
[]	Financial Liquidation	All project costs have been incurred and paid; all financial obligations under the fixed amount subaward have been liquidated.
[]	BEAD Fund Reconciliation	Final reconciliation of BEAD grant funds is complete; any unspent BEAD funds have been identified and returned to BPD.

[]	BABA Compliance Documentation	Documentation demonstrating full compliance with the Build America, Buy America (BABA) Act is compiled, including the BABA Reporting Subrecipient Tracker detailing Country of Origin for finished manufactured products used under the BEAD waiver.
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(E) Final Compliance, Recordation, & Closeout

Status	Criterion	Alignment & Verification
[]	Audits and Findings Resolution	All monitoring or audit findings related to this subaward have been fully resolved and closed out with BPD.
[]	Federal Interest Recordation	Proof of the UCC-1 filing (along with the required equipment inventory list) has been submitted to BPD, providing public notice of the 10-year Federal interest in the BEAD-funded assets.
[]	Final Reports Submitted	All required reports (Periodic Progress & Financial Reports, Final Financial Report, etc., as listed in Exhibit G) have been submitted and accepted by BPD through the final reporting period.
[]	Record Retention	All records related to the project (including network designs, costs, and timelines) are organized and retained for a period of at least three (3) years from the date of submission of the subgrant's final expenditure report.
[]	Final Project Acceptance	BPD (potentially with NTIA representatives) has successfully completed the final acceptance inspection of the project work.
[]	BPD Notification Issued	BPD has issued formal written notification to the Subgrantee of Final Project Acceptance and successful certification of service initiation.