

Exhibit C: Evidentiary Materials List

CNMI Broadband Equity, Access, and Deployment (BEAD) Program Subgrant Agreement between CNMI BPD and Micronesia Telecommunications Corp. dba IT&E

Field	Detail
Project Name(s)/Identifier(s)	All 20 Project Funding Areas (CNMI-S1 through CNMI-S17, CNMI-R1, CNMI-T1, and CNMI-T2 as individually detailed in the attached Exhibits A)
Subgrantee	Micronesia Telecommunications Corp. dba IT&E
BPD Subgrant Award Identifier	CNMI Broadband Equity, Access, and Deployment (BEAD) Program Subgrant Agreement (Covering all 20 PFA Awards)
Agreement Effective Date	May 13, 2026

Instructions

The Subgrantee must provide the following documentation and information to the CNMI BPD as required by the Subgrant Agreement, NTIA guidance (including the BEAD NOFO and the BEAD Restructuring Policy Notice (RPN)), and CNMI BEAD Program Procedures.

Submission and BPD acceptance of these materials are prerequisites for key project stages, specifically the issuance of the Notice to Proceed with Pre-Implementation Activities (NTPPIA) and the **Notice to Proceed with Construction (NTPC)**. Construction and ground-disturbing activities cannot begin until all Environmental and Historic Preservation (EHP) requirements are completed and the NTPC is issued. BPD reserves the right to request additional clarifying information.

A. General and Compliance Documentation

Documentation Required	Required Stage	Source/Requirement Alignment
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Corporate/Legal Entity Certification	NTPPIA	Certification that the Subgrantee is capable of carrying out funded activities in a competent manner and in compliance with all applicable federal, CNMI Territorial, and local laws.
Other Public Funding Disclosure	NTPPIA	Comprehensive disclosure for the Subgrantee and its affiliates of all applications submitted (or planned) and every broadband deployment project undertaken using public funds , including details on service speed, coverage area, commitment to serve unserved/underserved areas, amount of funding, consumer costs, and matching commitment.
Ownership Information	NTPPIA	Documentation detailing ownership structure consistent with 47 C.F.R. § 1.2112(a)(1)-(7) .
Labor Law Compliance Certification	NTPPIA	Certification of compliance with existing federal labor and employment laws .
Insurance Documentation	NTPC	Certificates of Insurance demonstrating required coverages (e.g., Workers' Comp, General Liability, Professional Liability, Auto Liability, Builder's Risk) as specified by BPD.

B. Financial Capability and Matching Funds

The Subgrantee must demonstrate financial capability to meet the commitments of the subgrant and adhere to the disbursement method, which, for CNMI BPD, follows a **fixed amount subaward structure** contingent upon satisfactory completion of milestones.

Documentation Required	Required Stage	Source/Requirement Alignment
Financial Qualification Certifications	NTPPIA	Certifications by an authorized officer (and approved by the governing board) that the Subgrantee: 1) Is financially qualified to meet project obligations; 2) Has available funds for all project costs that exceed the grant amount ; and 3) Has sufficient financial resources to cover its eligible costs until BPD authorizes additional disbursements upon completion of service milestones.
Business Plan / Financial Sustainability	NTPPIA	Submission of pro forma business plans and related analyses (e.g., cash flow, balance sheet projections) that

		substantiate the sustainability of the proposed project and ongoing operations.
Letter of Credit (LoC) / Performance Bond (Commitment)	NTPPIA	Commitment letter from an eligible institution (bank, credit union, or certified surety) to issue an irrevocable standby LoC or Performance Bond . CNMI BPD requires the value to be no less than ten percent (10%) of the total Federal Subaward amount , consistent with the NTIA programmatic waiver for reimbursement-based funding issued within periods of no more than six months.
Insurance Documentation	NTPC	Certificates of Insurance demonstrating compliance with the insurance requirements of 2 C.F.R. § 200.310 with the following minimum limits: <ul style="list-style-type: none"> • Worker's Compensation: CNMI Statutory Limit • General Liability: At least \$1,000,000 per occurrence / \$2,000,000 in aggregate. • Professional Liability: \$1,000,000 (Covers design errors over the 10-year term). • Auto Liability: At least \$1,000,000 Combined Single Limit.
Letter of Credit (LoC) / Performance Bond (Executed)	NTPC	Executed irrevocable standby LoC or Performance Bond acceptable to BPD, in a minimum amount of ten percent (10%) of the Federal Subaward , subject to full release upon completion (M6). (Note: The default 25% LoC or 100% Performance Bond options are available if the Subgrantee does not meet the criteria for the 10% waiver option). No grant funds will be paid or disbursed to the Subgrantee during the 60-day grace period until this executed document is secured and accepted by BPD. Failure to provide the executed LoC/Bond within 60 days of Agreement execution is grounds for immediate termination of the Subaward.
Non-Federal Match Documentation	NTPPIA / Ongoing	Detailed evidence of committed non-Federal matching funds, which BPD intends to secure through in-kind contributions in the exact amount and percentage of the total project cost as established in Exhibit B (Source of Funds Schedule) from subrecipients. Documentation must confirm the source, type, and valuation of the match, adhering to 2 C.F.R. § 200.306 . Subgrantees must report match proportional to each milestone met, unit built, or project complete.

C. Managerial, Technical, and Deployment Plans

Documentation Required	Required Stage	Source/Requirement Alignment
Managerial Readiness Narrative	NTPPIA	Narrative describing readiness to manage the project, including experience with similar projects, qualifications of key management, organizational changes, and relevant organizational policies.
Key Personnel Resumes & Org Chart	NTPPIA	Resumes for key management personnel and organizational charts detailing corporate relationships (including parents, subsidiaries, and affiliates).
Operational Capability Evidence	NTPPIA	Evidence demonstrating operational capability (e.g., years of experience, current subscriber numbers, completed federally funded deployment projects, or sufficient resources secured via contract for new entrants).
Final Network Design & Specs	NTPC	Final, detailed network design, diagrams, and specifications, certified to confirm the network can meet BEAD performance requirements ($\geq 100/20$ Mbps BSLs, 1 Gbps symmetrical CAIs, less than or equal to 100ms latency). This must demonstrate adherence to the Priority Broadband Project (PBP) checklist standards established by BPD (e.g., resilience/climate hardening appropriate for the CNMI environment).
Project Costs & Capital Schedule	NTPC	Detailed breakdown of estimated project costs (aligning with Exhibit B). Submission of a Capital Investment Schedule .
PE Certification	NTPC	Certification by a Professional Engineer (PE) (licensed in any of the 56 Eligible Entities) of the network design, diagrams, project costs, build-out timeline, and milestones, confirming the network can deliver requisite service. <i>(Note: The PE certification requirement is conditionally waived for the Capital Investment Schedule itself by the RPN).</i>
Build-Out Timeline and Milestones	NTPC	Detailed milestone schedule for project implementation, evidencing completion and service initiation within the four-year requirement from subgrant receipt, aligned with the fixed-amount subaward payment structure (Exhibit S, if applicable).

D. Risk Management and Federal Interest Documentation

Documentation Required	Required Stage	Source/Requirement Alignment
Cybersecurity Risk Management Plan	NTPC	Submission of an operational plan (or ready to be operationalized) that addresses cybersecurity risks, is aligned with the NIST Framework (v1.1) and E.O. 14028 , and will be periodically reevaluated and updated.
Supply Chain Risk Management (SCRM) Plan/Attestation	NTPC	Submission of SCRM plans or attestations demonstrating use of trusted vendors and adherence to best practices, aligned with NISTIR 8276 and NIST SP 800-161 .
UCC-1 Filing Documentation	Closeout Milestone	Proof of UCC-1 filing with the appropriate State office (along with equipment inventory list) to provide public notice of the 10-year Federal interest in BEAD-funded equipment, including the associated Attorney's Certification .
Covenant of Purpose, Use and Ownership	Closeout Milestone	Properly recorded Covenant (for real property/infrastructure) to document the Federal interest and restrictions on use and disposition during the Federal Interest Period.

E. Environmental and Historic Preservation (EHP)

Documentation Required	Required Stage	Source/Requirement Alignment
EHP/NEPA Compliance Documentation	NTPC	Submission of all environmental documentation necessary to comply with the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) . This process involves the Eligible Entity (BPD) and Subgrantee working together to ensure compliance.
ESAPTT Project Records	NTPC	Confirmation that the Subgrantee has cooperated with BPD in generating NEPA project records using the Environmental Screening and Permitting Tracking Tool (ESAPTT) , including documenting categorical

		exclusions and extraordinary circumstances, as required by the RPN.
Proof of Permits/Easements	NTPC	Proof that all necessary federal, CNMI, and local governmental permits, easements, and rights-of-way have been obtained (e.g., documentation related to the CNMI One-Start Permitting Process).