

## Exhibit J: Project Completion Criteria

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

Field	Detail
<b>Project Name(s)/Identifier(s)</b>	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)
<b>Subgrantee</b>	Micronesia Telecommunications Corp. dba IT&E
<b>BPD Subgrant Award Identifier</b>	CNMI Broadband Equity, Access, and Deployment (BEAD) Program Subgrant Agreement (Covering all 20 PFA Awards)
<b>Agreement Effective Date</b>	May 13, 2026

**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:

Field	Detail
<b>Project Name/Identifier</b>	[Unique Name or Identifier from Exhibit A]

### (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
[ ]	<b>Full Physical Construction Completion</b>	All physical construction activities described in Exhibit A (Scope of Work) and the approved final network design are fully completed.
[ ]	<b>Design Consistency (PE Certified)</b>	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).
[ ]	<b>CNMI Resilience Requirements Met</b>	The deployed infrastructure complies with CNMI's <b>Priority Broadband Project (PBP)</b> commitments, including <b>climate hardening</b> and network architecture suitable for the island environment (e.g., underground prioritization).
[ ]	<b>As-Built Documentation</b>	Final "As-Built" network documentation, reflecting the completed infrastructure, has been prepared and submitted to BPD.
[ ]	<b>Site Restoration</b>	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
[ ]	<b>Network Operational</b>	The constructed network is fully operational, capable of transmitting fixed broadband internet access service, and has been placed into service.
[ ]	<b>BSL Performance Standard Met</b>	Network performance testing (speed, latency) demonstrates compliance with <b>Qualifying Broadband Service</b> standards: minimum <b>100 Mbps download</b> and <b>20</b>

		<b>Mbps upload</b> speeds for all Broadband Serviceable Locations (BSLs), with latency less than or equal to 100ms.
[ ]	<b>CAI Performance Standard Met</b>	Service provisioned to eligible Community Anchor Institutions (CAIs) meets the requirement of <b>1 Gbps symmetrical</b> (upload/download).
[ ]	<b>Required Testing Documentation</b>	Performance testing records (speed, latency, reliability/availability) are submitted to BPD, confirming, at a minimum, the <b>80/80 standard</b> .

**(C) Service Obligations and Compliance**

Status	Criterion	Alignment & Verification
[ ]	<b>Deployment Deadline Met</b>	Project construction was completed, and the network was placed into service for all BSLs within the Project Funding Area <b>not later than four (4) years</b> after the date the subgrant was received.
[ ]	<b>Installation Standard Met</b>	Systems are in place to perform <b>standard installations</b> (initiation of service) within <b>ten (10) business days</b> of a customer request.
[ ]	<b>Drop Cost Prohibition</b>	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.
[ ]	<b>LCISO Available</b>	The approved <b>Low-Cost Service Option (LCISO)</b> is actively offered to eligible subscribers for the duration of the <b>10-year Federal Interest Period</b> .
[ ]	<b>Cybersecurity and SCRM</b>	Subgrantee confirms continued adherence to the BPD-approved <b>Cybersecurity Risk Management Plan</b> and <b>Supply Chain Risk Management (SCRM) Plan</b> .

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

Status	Criterion	Alignment & Verification
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[ ]	<b>Final Milestone Achieved</b>	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.
[ ]	<b>Match Obligation Fulfillment</b>	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.
[ ]	<b>Financial Liquidation</b>	All project costs have been incurred and paid; all financial obligations under the fixed amount subaward have been liquidated.
[ ]	<b>BEAD Fund Reconciliation</b>	Final reconciliation of BEAD grant funds is complete; any unspent BEAD funds have been identified and returned to BPD.
[ ]	<b>BABA Compliance Documentation</b>	Documentation demonstrating full compliance with the <b>Build America, Buy America (BABA) Act</b> is compiled, including the <b>BABA Reporting Subrecipient Tracker</b> detailing Country of Origin for finished manufactured products used under the BEAD waiver.

**(E) Final Compliance, Recordation, & Closeout**

<b>Status</b>	<b>Criterion</b>	<b>Alignment &amp; Verification</b>
[ ]	<b>Audits and Findings Resolution</b>	All monitoring or audit findings related to this subaward have been fully resolved and closed out with BPD.
[ ]	<b>Federal Interest Recordation</b>	Proof of the <b>UCC-1 filing</b> (along with the required equipment inventory list) has been submitted to BPD, providing public notice of the <b>10-year Federal interest</b> in the BEAD-funded assets.
[ ]	<b>Final Reports Submitted</b>	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.
[ ]	<b>Record Retention</b>	All records related to the project (including network designs, costs, and timelines) are organized and retained

		for a period of <b>at least three (3) years</b> from the date of submission of the subgrant's final expenditure report.
[ ]	<b>Final Project Acceptance</b>	BPD (potentially with NTIA representatives) has successfully completed the final acceptance inspection of the project work.
[ ]	<b>BPD Notification Issued</b>	BPD has issued formal written notification to the Subgrantee of <b>Final Project Acceptance</b> and successful certification of service initiation.

**For Micronesian Telecommunications Corp. dba IT&E:**

By: (Signature) \_\_\_\_\_

Printed Name: David H. Gibson

Title: CEO

Date: \_\_\_\_\_