

2025

ANNUAL REPORT

ON THE STATUS OF
BROADBAND DEVELOPMENT

NEBRASKA

BROADBAND OFFICE

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Glossary

BEAD Program: A \$42.5 billion federal program to expand access to affordable, reliable, high-speed Internet nationwide administered by the NTIA. NBO administers the \$405 million from this program allocated to Nebraska.

BEAD Eligible Location: A broadband serviceable location that is currently underserved or unserved and that does not have an enforceable commitment from another program to deploy broadband access to that location.

Broadband Serviceable Location: A business or residential location in the United States at which fixed broadband Internet access service is, or can be, installed.

Digital Equity: The competencies and skills required for navigating digital literacy skills.

Digital Inclusion: The activities that are necessary to ensure that all individuals in the United States have access to, and ability to use, affordable information and communication technologies.

Digital Literacy: The skills associated with using technology to enable users to find, evaluate, organize, create, and communicate information.

Last Mile: The physical infrastructure that connects a provider's network to a home, business, or other end-user device.

Middle Mile: The physical infrastructure that connects a network operator's core network to local networks.

Served Location: A broadband serviceable location is considered served if it has access to internet service speeds greater than or equal to 100 Mbps download and 20 Mbps upload (100/20 Mbps).

Underserved Location: A broadband serviceable location is considered underserved if it has access to internet service speeds less than 100/20 Mbps but greater than or equal to 25/3 Mbps.

Unserved Location: A broadband serviceable location is considered unserved if it has access only to internet service speeds less than 25 Mbps download and 3 Mbps upload.

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List of Abbreviations

BEAD.....	Broadband Equity, Access, and Deployment Program
BSL.....	Broadband Serviceable Location
CPF	Capital Projects Fund
DE.....	Digital Equity
DECAP	Digital Equity Capacity Grant Program
E-ACAM	Enhanced Alternative Connect America Cost Model Program
FTTP/FTTH.....	Fiber-to-the-Premises/Fiber-to-the-Home
ISP.....	Internet Service Provider
Mbps.....	Megabits per second
NBBP	Nebraska Broadband Bridge Program
NBO.....	Nebraska Broadband Office
NTIA.....	National Telecommunications and Information Administration
NUSF	Nebraska Universal Service Fund
PRO-AG	Precision Agriculture Infrastructure Grant Program
PSC.....	Nebraska Public Service Commission
RDOF	Rural Digital Opportunities Fund Program
TBCP.....	Tribal Broadband Connectivity Program

Letter from the Director

The Nebraska Broadband Office (NBO) is proud to announce the achievement of our most significant milestone – the allocation of more than \$42 million in Broadband, Equity, Access, and Deployment (BEAD) Program awards to connect the final 14,032 unserved and underserved Nebraska locations to high-speed, reliable broadband.

These awards, pending final approval by the National Telecommunications and Information Administration (NTIA), represent the biggest step yet toward total connectivity in our state.

This achievement is the result of steady effort, persistence and adaptation to changing federal guidance. NBO has worked tirelessly to meet every requirement of the BEAD program while keeping our focus on the needs of Nebraskans.

Creation of the NBO was one of Governor Jim Pillen's first initiatives. Our work now is to carry out his vision to meet Nebraska's broadband needs – especially in rural communities – by ensuring access that is affordable, reliable and high-speed.

The final 14,032 locations are the most challenging to connect. These are the places that providers have historically been reluctant to provide, as evidenced by the lack of applications to serve them received by our office.

For the first time, every one of these locations now has a firm commitment to receive the same broadband service available in our most connected communities. This is an extraordinary accomplishment that reflects a commitment to broadband for all.

Nebraska's plan embraces every solution, creating a deployment strategy that is practical and forward-looking. These technologies not only exceed NTIA's current requirements but are evolving rapidly, operating at the cutting edge and advancing before our eyes. Most importantly, this approach gets service to families and businesses faster.



Our plan also extends impact beyond homes and businesses by connecting 54 community anchor institutions, such as libraries, hospitals and fire stations that serve as vital hubs for communities. This new infrastructure will strengthen Nebraska's capacity for healthcare, education and emergency response while laying infrastructure that nearby communities can build upon.

Our work will not stop here. Approximately \$324.6 million of Nebraska's BEAD allocation remains unspent. NBO is aggressively working to keep these funds in the state. This would allow us to pursue non-deployment investments that will multiply the impact of these funds – enhancing precision agriculture, expanding access to healthcare technologies, supporting digital workforce readiness and preparing communities for an artificial intelligence and super-computer driven economy.

These efforts, combined with our deployment plan, will broaden opportunities for every Nebraskan, ensuring that both our people and our communities thrive in a rapidly evolving world.

This plan reflects the very best of Nebraska: persistence, adaptability and innovation. By combining the strengths of multiple technologies and preparing for what comes next, we are setting the stage for a broadband network that will serve Nebraskans today and keep our state at the forefront of connectivity tomorrow.

Sincerely,

A handwritten signature in black ink, appearing to be 'P. Haggerty', followed by a long horizontal line.

Patrick Haggerty

State Broadband Director | Nebraska Broadband Office

Executive Summary

This report covers the requirements of the annual report outline in LB 683 (2023).

These requirements are as follows:

- I. Describe the status of all publicly administered broadband deployment programs, including the number of projects funded through October of the report year.
- II. Describe the quality of broadband service being provided to Nebraska residents.
- III. Provide any updates to the strategic plan.
- IV. Summarize the Nebraska Broadband Office's outreach efforts and collaboration with all interested stakeholders.
- V. Provide an update on efforts to promote digital equity and inclusion on behalf of Nebraska residents.
- VI. Provide an update on state advocacy on broadband issues being conducted at the federal level.

The report was written using data and information provided by the Nebraska Public Service Commission (PSC) through ongoing collaboration concerning broadband service.

Annexes A and B are outside documents referenced in this report that are not necessary for understanding the contents of this report but are included to provide further information, context, or clarity on the relevant components of this report.

Status of Broadband Deployment Programs

- I. *Describe the status of all publicly administered broadband deployment programs, including the number of projects funded through October of the report year.*

State

Currently, there are four state-funded broadband buildout programs administered by the State of Nebraska. Each of these programs are administered by the Nebraska Public Service Commission (PSC) through statutes established in LB686 (1997), LB338 (2021), LB1024 (2022), and LB1144 (2022). Each of these programs were established with distinct structures to achieve the goal of broadband access for all Nebraskans. Each of these programs were operative in the last report year and will be discussed within their own sections below.

Nebraska Universal Service Fund (NUSF)

The NUSF was created in 1997 by the Nebraska Telecommunications Universal Service Fund Act and prompted the PSC to open an investigation on how to meet the universal voice service obligations set forth by the new statute concerning voice. This investigation culminated in 1999 with PSC implementing a multi-year transitional mechanism to reform intercarrier compensation and establish funding for NUSF. In 2001, PSC sought comment on methodologies to determine permanent funding for NUSF from Nebraska eligible telecommunications carriers (ETCs). In 2002, PSC adopted goals for the NUSF long-term support mechanism set forth as outlined in the 1997 legislation.

This mechanism is funded through a \$1.75 surcharge per connection for residential and businesses, and a 6.95% assessment for all other assessable services. Originally, the residential surcharge was based on assessable revenues but was changed to a per connection basis in 2019. The mechanism changed similarly for businesses in 2021. These surcharges provide funding necessary to support high-cost areas throughout the State and ensure that the quality service provided is affordable.

When the legislature passed the Nebraska Telecommunications Universal Service Fund Act it provided the PSC authority to create and regulate programs to further the goals set out within the legislation. The PSC then created several NUSF subprograms, each organized under their own docket. Among other objectives, the NUSF supports the development of broadband-capable voice networks as well as the ongoing operation and maintenance of those networks.

The NUSF programs specific to broadband buildout are NUSF-99, NUSF-108, NUSF-131, and NUSF-139. As of January 1, 2022, NUSF awards require projects to provide a minimum broadband speed of 100/100 Mbps pursuant to Neb. Rev. Stat. 86-324.01. NUSF allocation figures herein include projects awarded by the PSC across multiple program years and are at varying stages of completion. NUSF grant-based support is not

provided to companies until proof of costs incurred is submitted to and reviewed by the PSC.

Commission dockets NUSF-99 and NUSF-108 have been used to support the deployment of wireline broadband-capable voice infrastructure by price-cap carriers and rate-of-return carriers (respectively) in high-cost areas of Nebraska. The PSC utilized NUSF-99 and NUSF-108 support as reimbursement to carriers that have undertaken projects to bring service to census blocks that were identified as eligible by the PSC. The PSC used cost modeling to determine the maximum amount a carrier is eligible to receive in support each funding year, and to cap the amount that any carrier could receive to build out eligible areas of Nebraska. Carriers were required to submit project notices to the PSC that includes the estimated project cost and census blocks to which they planned to extend service. As of August 2025, \$32,193,916.57 was committed through NUSF-99, and \$12,092,954.34 was committed through NUSF-108.¹

Through the NUSF-139 docket, the PSC determined that it was appropriate to suspend broadband deployment support through the NUSF high-cost program starting in 2025, and in anticipation of broadband infrastructure grants made through other programs.² As a result, **NUSF-99** and **NUSF-108** did not issue new broadband deployment support in the report year.

NUSF-131 was a reverse-auction program that supported the deployment of broadband-capable voice infrastructure³ in unserved and underserved census block groups of Nebraska. Funding for the program came from funds that were redirected from NUSF-99, where price cap carriers had leftover funds, or in some cases declined to utilize support that was allocated to them. Support is distributed to winning bidders for a term of two years with extensions possible with PSC approval. One-half of awarded support is distributed to winning bidders upon approval of the bidders' Post-Auction Commitment Forms, with the remainder to be distributed once the bidder has completed its build of service to the bid area and fulfills speed testing requirements. Carriers could make bids in one of two tiers, the baseline tier (which required service to be delivered at speeds of 100/100 Mbps) and the gigabit tier (which required service to be delivered at speeds of 1

¹ Nebraska Public Service Commission, 2025 Annual Report on Telecommunications.

² See Commission Docket No. NUSF-139, Progression Order No.2, *In the Matter of the Nebraska Public Service Commission, on its own Motion, to consider appropriate modifications to the high-cost distribution and reporting mechanisms in its Universal Service Fund program in light of federal and state infrastructure grants*, Findings and Conclusions (July 9, 2024)

³ NUSF-131 reverse auction awards were technology neutral provided the proposed technology could demonstrate satisfaction of the minimum speed requirement for their winning bid tier.

Gbps/500 Mbps). \$19,435,251.11 is committed through NUSF-131.⁴ **Appendix A** details NUSF-131 awards that will be in varying stages of completion in the report year.⁵

Nebraska Broadband Bridge Program (NBBP)

On May 26, 2021, former Governor Pete Ricketts signed the Nebraska Broadband Bridge Act, LB 388 (2021), which created the Nebraska Broadband Bridge Program (NBBP) to facilitate and fund the deployment of broadband networks in unserved and underserved areas of Nebraska. Each biennium the legislature appropriated \$20 million per fiscal year from the State General Fund to be distributed as grants through the program and to pay administrative costs associated with the program. The PSC was allowed under Neb. Rev. Stat. 86-1310 to adopt and promulgate rules and regulations to carry out the NBBP.

The PSC is directed by statute⁶ to distribute grants based on three priorities ordered accordingly:

1. A project in a project area that is an unserved area which the commission has determined pursuant to section 75-160 or 86-166 and needs further support but has not received public assistance for the development of a broadband network.
2. A project that is in an unserved area that has received federal support for development of a broadband network, and that will not be completed within twenty-four months after the grant application deadline if the commission determines that a grant under the program will accelerate the deployment of the broadband network.
3. A project in a project area that is an underserved area and that the commission determines to have a digital inclusion plan.

Furthermore, a minimum weighted scoring system was established by the legislature for PSC to rank the applications received each fiscal year. The legislature determined the criteria to be included at a minimum are: the financial, technical, and legal capability of the applicant to deploy and operate broadband service; whether the applicant is an eligible telecommunications carrier; the ability of the applicant to offer comparable market rates inside the project area as they do outside of the project area; available minimum broadband speeds scored in favor of higher speeds, with a minimum of 100/100 Mbps; the scalability of the project in the future; and whether the applicant has committed to fund more than 50% of the total development costs of the project is

⁴ Nebraska Public Service Commission, 2025 Annual Report on Telecommunications.

⁵ There was no NUSF-131 reverse auction held in the report year. Awards made in the first and second 2024 NUSF-131 reverse auctions will be at varying stages of completion as the completion deadline for these projects are in 2026.

⁶ Neb. Rev. Stat. § 86-1305

located outside of a high-cost area, or more than 25% of the total development costs if the project is located inside a high-cost area⁷.

The PSC implemented an evidence-based challenge process to prevent overbuilding in areas where carriers already served or were in the process of building infrastructure to serve. The PSC distributes 25% of awarded NBBP grant funds to awardees upon award of the grant, 25% of funds in the ninth month following the grant award, and the remaining funds upon project completion, subject to submission and review of invoices proving costs incurred, and successful speed testing. NBBP projects must be completed within 18 months of award, however applicants may request extensions of time.

Figure 1 is a map of Nebraska displaying the 2023 and 2024 NBBP award areas.

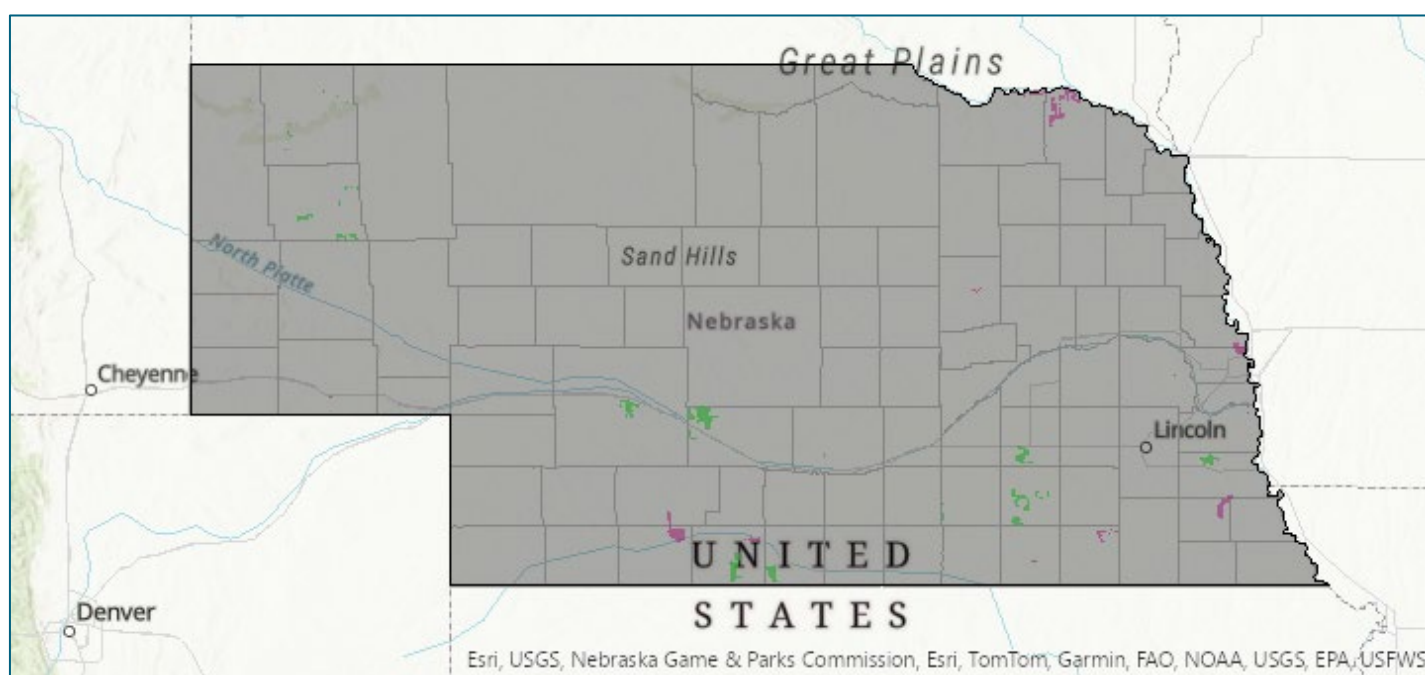


Figure 1. Pink Areas = 2023 NBBP Award Areas; Green Areas = 2024 NBBP Award Areas.

Awards for the 2023 NBBP cycle were announced on January 1, 2024, and had a completion deadline of July 9, 2025. Extensions are occasionally granted due to factors such as weather delays, supply chain, labor or equipment availability issues, permitting or right-of-way challenges, or other unforeseen circumstances that can affect project construction timelines.

⁷ The PSC publishes information and maps showing eligible high-cost areas in Nebraska for participants. High-cost areas include areas outside of cities, villages, or unincorporated areas as defined in the 2020 US Census, and census blocks with less than 20 households and densities lower than 42 households per square mile.

Table 1 details 2023 NBBP projects.⁸

Applicant	Project Name	Grant Award	Locations Served	Deadline
Diode Cable Co.	Plymouth West*	\$987,750.00	79	8/15/25
Hartington Telecommunications Co., Inc (dba Hartelco)	Project A1 (Rural Fordyce)	\$925,413.00	46	7/10/26
Hartington Telecommunications Co., Inc (dba Hartelco)	Project A2 (Menominee)	\$1,286,975.00	48	7/10/26
Hartington Telecommunications Co., Inc (dba Hartelco)	Project B (Rural St. Helena)	\$1,030,710.00	41	7/10/26
Hartington Telecommunications Co., Inc d/b/a Hartelco	Project E (Lewis and Clark Lake)	\$3,949,781.00	479	7/10/26
Pinpoint Communications, Inc.	Rural Beatrice 2	\$535,500.00	23	1/9/26
Pinpoint Communications, Inc.	Rural Cook to Talmage	\$1,165,500.00	55	1/9/26
Pinpoint Communications, Inc.	Rural Oxford-Edison*	\$945,000.00	41	10/9/25
Total		\$10,826,629.00	812	

Table 1. * Denotes projects now reported as complete.

Grant awards for the 2024 NBBP cycle were released on January 14, 2025. \$27,691,558.55 in total grant funding was requested across 27 applications. The PSC approved 22 applications for award totaling \$20,270,724.55, of which 21 were ultimately funded for \$20,135,599.55, after one award was declined by the applicant. **Table 2** details the awards made for the **2024 NBBP** cycle. These projects have a completion deadline of July 14, 2026. Extensions may be granted by the PSC and must be requested by June 12, 2026.

Applicant	Project Name	Locations Served	Grant Award
ALLO Communications LLC	Fremont to Schuyler	81	\$760,354.00
ALLO Communications LLC	North Conestoga Lake	39	\$320,912.00
ALLO Communications LLC	North of North Platte	66	\$3,610,697.00
ALLO Communications LLC	Northwest Kearney	118	\$266,866.00

Table 2, cont.

⁸ One award for \$1,004,336.00 to serve 145 locations was returned by the applicant and is not included.

Applicant	Project Name	Locations Served	Grant Award
ALLO Communications LLC	Northwest Lake Maloney	15	\$121,103.00
ALLO Communications LLC	West Lake Maloney	22	\$225,698.00
ALLO Communications LLC	West Scottsbluff	20	\$594,074.00
Glenwood Telecommunications, Inc.	Fillmore County 3	88	\$539,639.00
Glenwood Telecommunications, Inc.	Glenvil Spur	12	\$275,235.00
Glenwood Telecommunications, Inc.	Strang	24	\$364,217.08
Glenwood Telecommunications, Inc.	York County 2	53	\$1,005,167.02
Mobius Communications	24_MOBIUS_BBC	23	\$1,417,886.03
Mobius Communications	24_MOBIUS_DAWES	28	\$1,120,098.28
Pinpoint Communications, Inc.	Beaver City 1	7	\$381,651.52
Pinpoint Communications, Inc.	Beaver City 3	31	\$1,161,237.12
Pinpoint Communications, Inc.	Gothenburg 1	26	\$2,974,350/00
Pinpoint Communications, Inc.	Gothenburg 2	32	\$903,336.00
Pinpoint Communications, Inc.	Gothenburg 3	87	\$1,420,250.00
Pinpoint Communications, Inc.	North Platte Southeast	97	\$413,725.00
Pinpoint Communications, Inc.	North Syracuse	85	\$1,931,875.00
Pinpoint Communications, Inc.	South Stamford-Orleans	22	\$1,702,215.00
Total		976	\$20,135,599.55

Table 2.

In early 2025, the PSC opened docket C-5640 to conduct the 2025 NBBP grant cycle. Amidst uncertainty about funding for the program during the 2025 legislative session, the PSC paused the docket. Once it became clear that the Nebraska Legislature was not going to appropriate funding for additional grant cycles, the PSC closed the docket, and no NBBP awards were made in 2025. The PSC continues to evaluate whether future grant rounds may be possible, contingent on funding for awards being available.⁹

Capital Projects Fund (CPF)

On April 18, 2022, then-Governor Pete Ricketts signed the Economic Recovery Act, LB1024 (2022), which authorized Nebraska to receive and use funds from the federal Coronavirus Capital Projects Fund (CPF) to support capital projects across the state. This program was funded through a one-time infusion of funds from the American Rescue Plan Act of 2021. The purpose of the funding was to allow the State to carry out capital projects enabling work, education, and health monitoring in response to the COVID-19

⁹ Nebraska Public Service Commission, 2025 Annual Report on Telecommunications

pandemic. State statute later limited broadband buildout to locations in the 1st and 3rd Congressional Districts pictured in red and green, respectively, in Figure 2.

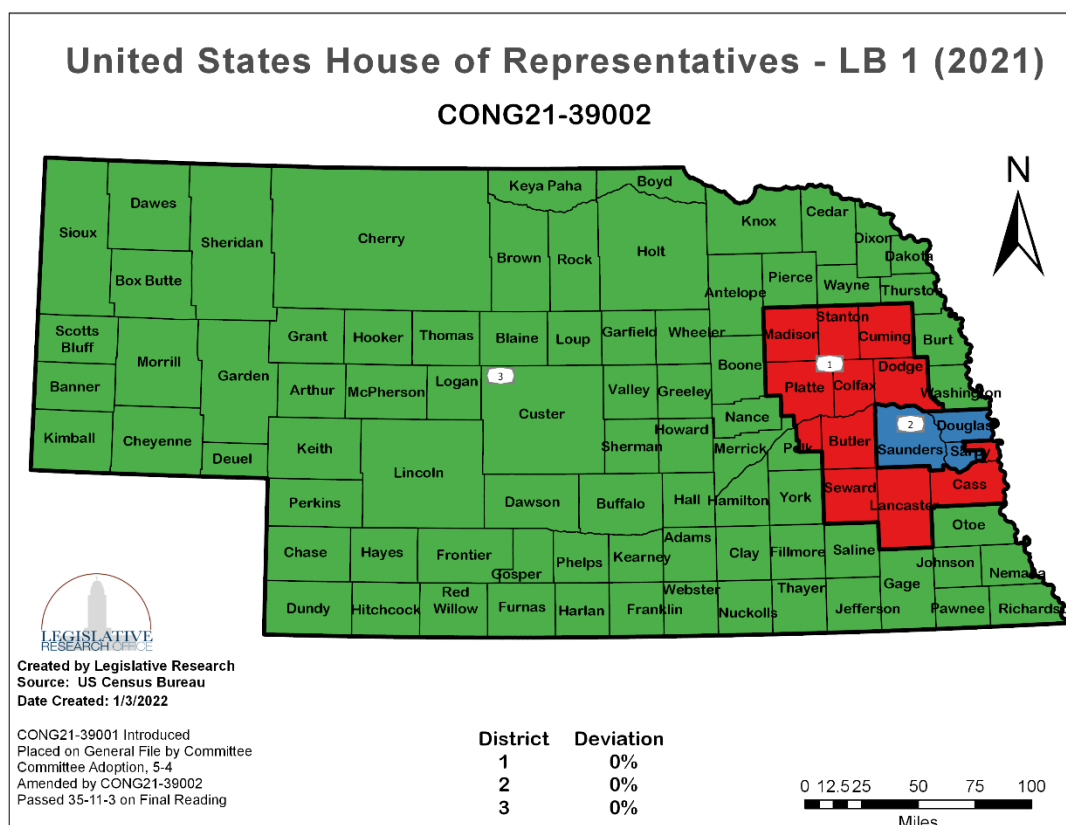


Figure 2.

Nebraska was awarded \$128,740,178, inclusive of administrative costs. The Nebraska Economic Recovery Act (LB 1024, 2022, Sec. 13) allocates the CPF funding as follows:

1. No less than \$40 Million for Broadband Projects in CD-1
2. No more than \$35 Million for Multipurpose community facilities in CD-2
3. No less than \$40 Million for Broadband Projects in CD-3
4. No more than \$5 Million for total administration of the program

The funds were allocated to the Department of Economic Development (DED) under statute, which entered into a Memorandum of Understanding (MOU) with the PSC to administer the broadband projects in CD-1 and CD-3 in a manner similar to the NBBP. As such, qualifying projects in this program must provide service scalable to 100/100 Mbps or greater. While LB 1024 § 13(2) exempts CPF broadband projects from the matching funds requirement in § 86-1304, the PSC included a matching funds component in the application scoring process. No applicant match was required but was encouraged.

Furthermore, eligible project areas were defined under Neb. Rev. Stat. § 81-12,245 to be in an unserved area or underserved area within CD-1 or CD-3 as defined by the PSC. In the case of CD-3, projects in the first round of awards (CPF-1) were required by statute to be entirely located within the geographical boundaries of cities of the second class as defined by Neb. Rev. Stat. § 17-01, and villages as defined by Neb. Rev. Stat. § 17-201.

To ensure compliance with grant requirements, funds for projects are distributed at specific intervals during and after construction, and the final grant payment is not made until all requirements have been met. 25% of grant funds are dispersed upon award, 50% of funds are dispersed in the ninth month following the award, and the remaining funds are dispersed upon completion of the project, subject to proof of actual costs, and successful speed testing. Disbursements to awardees for Capital Projects Fund projects must be completed by December 31, 2026, per U.S. Treasury guidance.

On June 27, 2023, the Commission issued CPF-1 grant awards. In CD-1, the Commission issued \$40,311,361.47 in grant awards. In CD-3, the Commission issued \$20,033,925.62 in grant awards. Projects funded through CPF-1 were required to be completed by December 27, 2024. Applicants could request deadline extensions, and 13 extension requests have been granted. Many of these extension dates have elapsed and as such most CPF-1 projects have been completed. There are two CPF-1 projects, representing 4.15% of awarded locations and 5.73% of awarded funding, which have had deadline extensions to June 27, 2026, granted. A third CPF-1 project representing 3.6% of awarded locations and 1.68% of awarded funding has been granted a deadline extension to September 30, 2026.

Because funding remained available following the CPF-1 grant awards, particularly in CD-3, the Commission initiated a second round of grants (CPF-2) on December 20, 2023, to allocated the remaining program funds. Pursuant to statutory changes enacted through LB 683 (2023), eligibility in CPF-2 was expanded to include all unserved or underserved areas in CD-3, rather than being limited to cities of the second class and villages as required under the original provisions of LB 1024 (2022)

CPF-2 award areas are highlighted in orange in **Figure 3** below.



Figure 3.

CPF-2 grant awards were issued on June 4, 2024. CPF-2 projects have a completion deadline of December 25, 2025, unless granted a deadline extension. **Table B1** in **Appendix B** summarizes CPF-2 projects.

Precision Agriculture Infrastructure Grant Program

Established by LB1144 (2022), the Precision Agriculture Infrastructure Grant Program (PRO-AG) is administered by the PSC. PRO-AG has two subprograms, the Connectivity Subprogram and the Devices and Technology Subprogram. The Legislature allocated approximately \$1 million of State General Funds to be used for PRO-AG grants in each fiscal years 2023-2024 and 2024-2025. By statute, the PSC shall award up to one-half of the available grant funds in each of the subprograms.

The Connectivity Subprogram supports the provision of adequate precision agriculture connectivity to farm structures and devices. Broadband buildout direct costs are permitted under this subprogram, though they are not to exceed 25% of the total project costs and must demonstrate alignment with program objectives. Awardees have twelve months after being awarded to complete the project and must submit speed tests to verify they are providing the required 100/20 Mbps minimum service. The PSC may grant one six-month extension upon request with good cause by the applicant shown.

The PSC administered the 2023-2024 PRO-AG cycle in docket captioned C-5529. \$453,239 was available to each subprogram for awards. Three Connectivity subprogram

awards were made to Inventive Wireless of Nebraska, LLC (dba Vistabeam) totaling \$391,280¹⁰. These awards supported the build-out of fixed wireless networks to support connectivity of water monitoring systems for local NRDs in Western Nebraska and had a completion deadline of April 30, 2025. As of submission of this report, no extension has been requested or granted, and the company has reported the projects as complete and is actively working through the closeout processes.

The PSC administered the 2024-2025 PRO-AG cycle in docket captioned C-5600. \$564,538.85 was available to each subprogram for awards. Applications were due by January 17, 2025, and awards were issued on April 15, 2025. The PSC received four applications for the Connectivity subprogram and determined that none of them could be funded as they failed to meet program requirements. The PSC cited the proposal of a general-purpose connectivity project rather than the program required provision of precision agriculture connectivity to on-farm structures and devices as the reason for not making an award. The PSC also requested and received additional information regarding on-farm structures and devices to be served, which upon review most were already served or within the project area of an award for another program. To utilize the available funding in the Connectivity subprogram the PSC conducted a second round of 2024-2025 PRO-AG grants. Applications for this second round were due May 6, 2025, with awards to be released on June 24, 2025.

In the second round of 2024-2025 PRO-AG grants, the PSC received seven applications in the Connectivity subprogram. However, the PSC again determined that none of the applications could be funded as they failed to meet program requirements. The PSC cited issues with these applications being: the locations some applications proposed to serve were already reported as served¹¹, an entity applying for Connectivity funding was ineligible¹², and applications sought to use funds for the purchase of devices and technology rather than furnishing connectivity. As a result of not receiving qualified applications, no awards were made in the Connectivity subprogram for the report year.

The Legislature did not allocate additional funding for PRO-AG grants in fiscal years 2025-2026 and 2026-2027.

¹⁰ The funds not awarded in each subprogram were carried forward and divided between them in the following year grant cycle for award.

¹¹ Based on the FCC's Broadband Data Collection map.

¹² The applying entity identified as an Agricultural Producer and lacked a provider partner in their application, as the PRO-AG program requires for the Connectivity subprogram.

Federal

Broadband Equity, Access, and Deployment Program

The Broadband Equity, Access, and Deployment (BEAD) program is a \$42.25 billion federal grant program created in 2021 by the Infrastructure Investment and Jobs Act (IIJA). The BEAD program aims to connect every American to high-speed internet by funding broadband infrastructure projects. The BEAD program is administered by the National Telecommunications and Information Administration (NTIA), a U.S. Department of Commerce agency. NTIA announced the allocations¹³ to states and territories in June 2023.

Nebraska was allocated \$405,281,070.41 in BEAD funding. While the federal BEAD program is administered by NTIA, states and territories effectively administer state-level versions of BEAD as subgrantees of NTIA. The Nebraska Broadband Office (NBO) administers the BEAD program in Nebraska as the Nebraska Broadband Equity, Access, and Deployment (NBEAD) program.¹⁴

Pre-Policy Notice

NBO began its subgrantee selection process by releasing the NBEAD Request for Application (RFA) on February 7, 2025. This initiated the first stage of the award process, the Organizational Application (OA) period. Providers interested in participating in NBEAD were required to submit an OA. OAs were designed to collect information that would allow NBO to evaluate and ensure applicants were competent and eligible to participate. Applicants that passed this stage became Approved Applicants, a designation NBO required for participation in later stages of the award process. The OA period closed on March 9, 2025.

Over the course of the subgrantee selection process, NBO held three OA periods to maximize the opportunity for participation: an initial OA, a BoB round OA, and a Community Anchor Institution (CAI) round OA. In total twenty-six providers submitted OAs. All applicants fulfilled the OA requirements and were made Approved Applicants. NBO communicated approved status to the applicants via email and announced the list of Approved Applicants publicly via press release and published the list to its website on March 31, 2025.

NBO initiated the second stage of its subgrantee selection process on April 1, 2025, with the opening of the first round of the Project Application (PA) stage.¹⁵ In this stage,

¹³ The amount allocated to each state and territory was determined by a formula set by the IIJA.

¹⁴ The description of NBEAD included in this report focuses on the deployment component of the program to date. For additional information regarding NBEAD, see the “BEAD Documents” page of the NBO website.

¹⁵ BEAD requires that states serve all unserved and underserved broadband serviceable locations within their jurisdiction. To fulfill this mandate, NBO did not preclude the possibility that additional PA rounds would be necessary.

Approved Applicants could apply for award(s). Locations eligible for BEAD projects were organized into 133 Defined Project Areas (DPAs).¹⁶ The first round of the PA stage closed on May 16, 2025. Following the closure of the PA, NBO began to evaluate applications received.

Post-Policy Notice

On June 6, 2025, NTIA released the BEAD Restructuring Policy Notice (RPN). **Annex B** is a copy of the RPN. The RPN modified the BEAD program by eliminating regulatory requirements¹⁷, required states take a technology-neutral approach in making BEAD awards¹⁸, modified the eligible location inventory of states¹⁹, required states conduct an additional “Benefit of the Bargain” (BoB) round, and required states to submit their Final Proposal within 90 days of the RPN²⁰. As a result of the RPN, NBO paused its award process and ceased further evaluation of applications received to make program changes necessary to comply with the RPN.

On June 18, 2025, NBO held a technical assistance call with Approved Applicants and providers that had expressed interest in applying in the BoB round. NBO discussed the updated program schedule and changes to the organizational and project applications resulting from the RPN. On June 19, 2025, NBO posted an updated Request for Applications (RFA) that reflected the changes made to comply with the RPN to its website. The DPA map was updated for the BoB round²¹ to reflect the RPN reducing Nebraska’s BEAD eligible BSL inventory by approximately 50%. On June 23, 2025, NBO posted the updated DPA map of 177 DPAs encompassing 14,032 BSLs to its website.

NBO opened its BoB round on June 26, 2025. The BoB round was structured with an OA period (open from June 26 to July 7, 2025) allowing for new participants and a PA period (open from June 26 to July 9, 2025). Following the closure of the project application period on July 10, NBO began to evaluate applications.

On July 15, 2025, NTIA released additional guidance²² regarding Priority Project determination methods. As NBO was amid its subgrantee selection process, NBO again

¹⁶ DPAs were optimized to encourage provider participation and have the optimal lowest cost per passing across all DPAs.

¹⁷ The RPN eliminated requirements related to: labor, employment and workforce development; climate change; open access/net neutrality; local coordination and stakeholder engagement; non-traditional broadband providers; middle class affordability plan; and low-cost service option.

¹⁸ BEAD requirements previously advantaged fiber-optic technology over other broadband technologies.

¹⁹ NTIA required states to remove locations identified as served by unlicensed fixed wireless (ULFW) technology on the FCC’s National Broadband Map from their inventory and provided states with additional locations to be included as a result of Federal enforceable commitment defaults.

²⁰ This altered Nebraska’s previous Final Proposal submission deadline to September 4, 2025 (previously September 18, 2025).

²¹ Similar criteria were used to optimize the BoB round DPA map as the original DPA map.

²² See Broadband, Equity, Access and Deployment (BEAD) FAQs V12

paused application evaluation to incorporate that guidance to ensure NBO's compliance and alignment with BEAD program goals. NBO reevaluated its existing methodology to ensure it was capable of verifying that applicants could meet the statutory definition of a Priority Project in the context of the specific DPA they applied for. NBO was confident that its existing methodology could evaluate the speed and latency component of the definition on a DPA level. However, NBO believed it was insufficient to fully evaluate the scalability of proposals, in accordance with the definition, on a DPA level.

To address this, NBO contracted with a third-party to conduct a statewide analysis of NBEAD DPA geography and density²³. NBO also consulted with contracted engineering experts to determine thresholds for DPAs where failure to reliably meet NTIA minimum requirements became likely when served by specific technologies. Based on those determinations, NBO classified DPAs into tiers that would direct Priority Project designation:

- **Tier 1** - DPAs that require broadband service at speeds of no less than 100 Mbps for downloads and 20 Mbps for uploads; have latency less than or equal to 100 ms; can easily scale speeds over time to meet the evolving connectivity needs of households and businesses; and support the deployment of 5G, successor wireless technologies, and other advanced services; and possess a Broadband Serviceable Location (BSL) density cluster of six or more per square mile; and include statistically high proportions of locations with obstructions or topography challenges.
- **Tier 2** - DPA that require broadband service at speeds of no less than 100 Mbps for downloads and 20 Mbps for uploads; have latency less than or equal to 100 ms; can easily scale speeds over time to meet the evolving connectivity needs of households and businesses; and support the deployment of 5G, successor wireless technologies, and other advanced services; and possess a BSL density cluster of six or more per square mile.
- **Tier 3** - DPAs that require broadband service at speeds of no less than 100 Mbps for downloads and 20 Mbps for uploads; have latency less than or equal to 100 ms; can easily scale speeds over time to meet the evolving connectivity needs of households and businesses; and support the deployment of 5G, successor wireless technologies, and other advanced services; and include statistically high proportions of locations with obstructions or topography challenges.

²³ NTIA identified Project Area Geography and Project Area Density as examples of how Eligible Entities may analyze proposals to determine if they meet the statutory criteria for a Priority Broadband Project in the BEAD FAQs.

- **Tier 4** - DPAs that require broadband service at speeds of no less than 100 Mbps for downloads and 20 Mbps for uploads; have latency less than or equal to 100 ms; can easily scale speeds over time to meet the evolving connectivity needs of households and businesses; and support the deployment of 5G, successor wireless technologies, and other advanced services; and do not possess a BSL density cluster of six or more per square mile and that include statistically high proportions of locations with obstructions or topography challenges.

The NBEAD RFA was amended to reflect these changes on August 7, 2025. Following this update NBO resumed evaluation of applications. Based on the applications received in the BoB round NBO determined that an additional BoB round was required as some DPAs lacked a qualified application. In the second BoB round, NBO sought applications for DPAs whose Priority Project determination had changed and had not received a qualifying priority application, as well as BSLs that had been excluded from first round applications. Applicants that had shown previous interest in the first BoB round DPA or had excluded BSLs were reengaged to consider applying again. NBO also held a CAI round open to all applicants.²⁴

Both the second BoB round and the CAI round opened on August 5, 2025, and closed on August 15, 2025. NBO proceeded to direct negotiations with providers for BSLs that lacked an application. Once concluded, NBO evaluated both BoB round applications, CAI Round applications, and negotiation materials. NBO scored applications based on the rubric set by the RPN. Preliminary award decisions were made by the Nebraska Broadband Director.

Table 3 summarizes **BEAD program** awards by provider, technology, total award amount, and total locations awarded.²⁵

Provider	Technology	BEAD Award	Locations
Amazon Kuiper Commercial Services	Low-Earth Orbit Satellite	\$2,287,450.00	1,496
AMG Technology Investment Group, LLC	Licensed Fixed Wireless	\$19,070,540.23	7,887
Inventive Wireless of Nebraska LLC	Licensed Fixed Wireless	\$510,00.00	115

Table 3, cont.

²⁴ NBO provided a list of Community Anchor Institutions eligible for application. Providers could select the CAIs to include in their application which, if awarded, would constitute a single project. Applicants were required to commit to service speeds of not less than 1 Gbps download and 1 Gbps upload.

²⁵ Summary table encompasses all preliminary awards made to that provider. Location totals include broadband serviceable locations and CAIs awarded. Location totals with preliminary CAI awards included are denoted with *. Totals that are exclusively CAIs are denoted with **.

Provider	Technology	BEAD Award	Locations
Midstates Data Transport LLC	Fiber	\$9,810,300.00	423*
Mobius Communications Co.	Fiber	\$1,979,312.06	293
Nedelco, Incorporated	Fiber	\$5,155,738.06	328
Northeast Nebraska Telephone Co.	Fiber	\$149,995.00	5**
Pinpoint Communications Inc.	Fiber	\$2,601,566.00	232
Quick Current-Nebraska LLC	Fiber	\$509,983.00	17**
Space Exploration Technologies Corp.	Low-Earth Orbit Satellite	\$2,480,672.16	3,268

Table 3.

NBO held a seven-day public comment period beginning September 3, 2025, and ending September 10, 2025. NBO submitted its Final Proposal to NTIA for final approval on September 19, 2025.²⁶ NBO is currently awaiting approval of the Final Proposal by NTIA. Until NTIA grants NBO final approval of its Final Proposal the details of the Final Proposal, including preliminary awards, are subject to change pending NTIA request. Once NBO has received final approval, NBO expects to quickly execute subgrants with awardees so they can begin their deployment projects.

USDA ReConnect Loan and Grant Program

The USDA ReConnect Program offers loans, grants, and loan-grant combinations to facilitate broadband deployment in areas of rural America that currently do not have sufficient access to broadband. It seeks to facilitate the expansion of broadband services and infrastructure, thereby fueling long-term rural economic development and opportunities in rural America.

In 2019, Eastern Nebraska Telephone Company was awarded \$5,734,822 through this program to deploy a FTTP network to rural areas of Pierce, Wayne, and Madison counties. The project covered a 212.12 square mile area with 489 households. Similarly, in 2020 Rock County Telephone Company was awarded \$3,105,462 to deploy a FTTH network in rural Nebraska. The project covered 287.88 square miles and 115 households. Both awards required completion within five years of receipt of award funding, placing an estimated deadline for completion for both in 2025.

There were no USDA ReConnect Loan and Grant Program awards approved in Nebraska during the report year.

Rural Digital Opportunities Fund

The Rural Digital Opportunity Fund (RDOF) was a reverse auction program that provided support to connect rural homes and small businesses to high-speed broadband networks

²⁶ NBO submitted a waiver request for a 19-day extension of its Final Proposal submission deadline to NTIA on July 18, 2025. NBO was notified of NTIA's approval of the request on August 4, 2025

established by the Federal Communications Commission (FCC) and administered by the Universal Service Administrative Company. RDOF support will be disbursed over 10 years, with a reassessment in year six that will revise location counts and deployment obligations.²⁷

RDOF participants must offer stand-alone voice services and broadband services at speeds²⁸ consistent with their winning bid at rates reasonably comparable to those available in urban areas to all locations within the award area over eight years of the 10-year program. Award areas were based on census block groups. Participating carriers must complete 40% of deployments by the end of year three (2024 if the carrier was authorized to receive support in 2021, and 2025 for carriers authorized to receive support in 2022 or later), 60% of deployments by the end of year four, 80% of deployments by the end of year five, and 100% of deployments by the end of year six.

Table 4 details the carriers with winning RDOF bids for locations in Nebraska, their support amounts, and deployment obligations.

Carrier	Assigned Support over 10 Years	Locations Assigned
AMG Technology Investment Group LLC	\$25,350,146.70	13,919
CenturyLink, Inc.	\$326,802.00	69
Cox Communications, Inc.	\$643,867.00	185
Grain Communications Opportunity Fund II, L.P.	\$19,816.40	116
Hamilton Long Distance Company	\$128,560.30	167
LTD Broadband LLC	\$33,228,644.00	28,729
Pinpoint Bidding Coalition	\$31,254.00	32
Skywave Wireless, Inc.	\$57,660.00	12
Windstream Services LLC, Debtor-in-Possession	\$579,530.00	195
Wisper-CABO 904 Consortium	\$11,256.00	11
Total	\$60,377,536.80	43,435

Table 4.

On September 27, 2024, Pinpoint Communications informed the FCC of its intent to surrender its awarded census block groups in Nebraska. Pinpoint will no longer receive RDOF support and will not be obligated to deploy service to their 32 awarded locations.

²⁷ Support amounts may also be adjusted based on these revisions.

²⁸ RDOF requires that the minimum speed offered be no less than 25 Mbps download and 3 Mbps upload.

In a letter to the FCC dated January 15, 2025, Cox Communications, Inc. announced that it had failed to meet the 40% deployment deadline in Nebraska. Cox said it was working to address the issue and recognized the FCC could penalize it for its failure to meet the deadline.

On June 6, 2025, Lumen Technologies Inc. (formerly CenturyLink, Inc.) notified the FCC that it was returning all census block groups it had been awarded through RDOF, including those it had been awarded in Nebraska. This made the locations eligible for other broadband subsidy programs, such as the Broadband Equity, Access, and Deployment (BEAD) program. As part of the BEAD Restructuring Policy Notice, the Nebraska Broadband Office was notified by NTIA of 42 locations²⁹ to be included in its BEAD eligible location inventory that were part of the Lumen default on June 13, 2025.

Enhanced A-CAM

The Enhanced Alternative Connect America Cost Model (Enhanced A-CAM) program was established by the FCC in 2023 to distribute approximately \$18.28 billion over 15 years to carriers to deploy, maintain, and improve broadband service networks nationwide. Broadband service supported using Enhanced A-CAM funds must be capable of speeds not less than 100 Mbps download and 20 Mbps upload. This program is also administered by the Universal Service Administrative Company.

Carriers had to elect to participate in Enhanced A-CAM, with monthly payments to electing carriers beginning in 2024. Nebraska has 12 participating carriers. Carriers accepting **Enhanced A-CAM** support in Nebraska, their annual support amounts, and their location buildout obligations are included in **Table 5** below.³⁰

Carrier	Annual Support Amount	E-ACAM Obligations
American Broadband Holding Company	\$2,742,652	3,058
Arapahoe Telephone Company	\$2,933,701	855
BW Telcom	\$2,143,045	155
Consolidated Companies, Inc.	\$8,780,624	3,266
DTC Holding Company	\$959,651	1
Great Plains Communications	\$33,251,968	19,193
K&M Telephone Company	\$1,849,713	1,054

Table 5, cont.

²⁹ This list of locations was determined by NTIA based on cross-referencing the locations defaulted on with the FCC Broadband Data Collection map and data submitted by NBO to NTIA for Nebraska's BEAD program challenge process. NTIA did not consider or include any other RDOF default in this list.

³⁰ Based on FCC Enhanced A-CAM Authorization Report available at <https://docs.fcc.gov/public/attachments/DOC-398068A1.xlsx>.

Carrier	Annual Support Amount	E-ACAM Obligations
Nedelco, Inc.	\$9,655,894	4,771
Northeast Nebraska Telephone Company	\$5,851,611	14
Pinpoint Holdings, Inc.	\$764,234	94
Southeast Nebraska Communications, Inc.	\$1,465,654	33
USConnect Holdings, Inc.	\$4,530,096	1,384
Total	\$74,928,843	33,878

Table 5.

Carriers are required to complete 50% of deployments by December 31, 2026, and complete 75% of deployments by December 31, 2027. Carriers have until December 31, 2028, to complete all deployment obligations.

Enabling Middle Mile Broadband Infrastructure Program

The Enabling Middle Mile Broadband Infrastructure Program is a \$1 billion federally funded program intended to enhance middle mile broadband infrastructure. On June 16, 2023, the Omaha Tribe of Nebraska was awarded \$36,374,797 through the program. The proposed project would see the Omaha Tribe of Nebraska and its 100% Tribally owned subsidiary, Quick Current LLC, deploy a fiber-based middle mile network to cover currently unserved and underserved Tribal and adjacent rural areas in eastern Nebraska and western Iowa with a specific focus on providing Middle Mile infrastructure and services to the tribal and surrounding areas of The Omaha Tribe of Nebraska and Iowa. The network will consist of 418 route miles of new fiber, 100 route miles of indefeasible right of use (IRU) dark fiber and 50 miles of upgraded fiber.

In accordance with the Notice of Funding Opportunity (NOFO) for the program, the Omaha Tribe of Nebraska agreed to complete the project within five years of receiving grant funding, placing the project completion deadline in 2028. The Middle Mile Tracking Dashboard maintained by NTIA lists overall project completion at 42%,³¹ with 22 of 568 total miles of fiber deployed or upgraded as of November 21, 2025.

Tribal Broadband Connectivity Program

NTIA describes the Tribal Broadband Connectivity Program (TBCP) in the program NOFO as seeking “to improve the quality of life, spur economic development and commercial activity, create opportunities for remote employment and online entrepreneurship, remote learning, and telehealth by expanding broadband access and providing digital training and

³¹ This is a progression of 17% since submission of the 2024 Annual Report. NTIA calculates project completion based on factors including but not limited to environmental assessment completion, network design, permit obtainment, network build, and equipment deployment

inclusion programs to Native American communities.” NTIA invited proposals that included broadband infrastructure deployment on Tribal lands.

In the first round of grants, Nebraska had two projects that supported broadband infrastructure deployment awarded: one to the Iowa Tribe of Kansas and Nebraska for \$498,000, and one to the Santee Sioux Nation for \$500,000. Both projects had completion deadlines in 2024.

NTIA initiated a second round of TBCP grants in late 2024 with the last award announcement being made on January 16, 2025. No entities in Nebraska have been awarded in the second round of TBCP grants to date. On November 12, 2025, NTIA announced it was pursuing streamlining reforms of the TBCP and would release a new Notice of Funding Opportunity (NOFO) in Spring 2026. NTIA indicated that all further infrastructure and use and adoption grants would be made under the forthcoming NOFO.

Connecting Minority Communities Program

NTIA’s intention with the Connecting Minority Communities Program as stated on their website is “to directly address the lack of broadband access, connectivity, adoption and equity at our nation’s Historically Black Colleges and Universities (HBCUs), Tribal Colleges and Universities (TCUs), and Minority-Serving Institutions (MSIs), and in their surrounding anchor communities.”

The Nebraska Indian Community College (NICC) was awarded \$2,938,816 from this program in 2023. The project aims to bridge the digital divide for its students, the majority of whom are Native American. Through this project they intend to hire the professionals needed to facilitate the college’s major technology shift to online classes and remote coursework. NICC also plans to provide laptops to all students and invest in equipment that augments the build-out of their 2.5Ghz network.

The award had an end date of February 28, 2025, meaning the project will likely have been completed as of submission of this report.³²

³² The Assistant Secretary of NTIA is empowered to issue an extension for good cause shown, however no public announcement of such extension being granted could be found.

Quality of Broadband Service

II. Describe the quality of broadband service being provided to Nebraska residents.

The quality of broadband service being provided to Nebraska residents can be described in multiple ways. Nebraska residents receive or have access to vastly different qualities of broadband service, generally bifurcated between the western and eastern halves of the state. This report focuses on the average levels of service, the distribution of broadband technology, and the cost of deployment across Nebraska.

Average Levels of Service

There are 793,518 Broadband Serviceable Locations (BSLs) in Nebraska, and 755,184 are reported as being served (having access to service speeds at least 100 Mbps download and 20 Mbps upload).³³ Table C1 in Appendix C details the number of served, underserved, and unserved locations per county. Counties with more served locations than unserved or underserved locations can be considered to have a higher quality of broadband service.

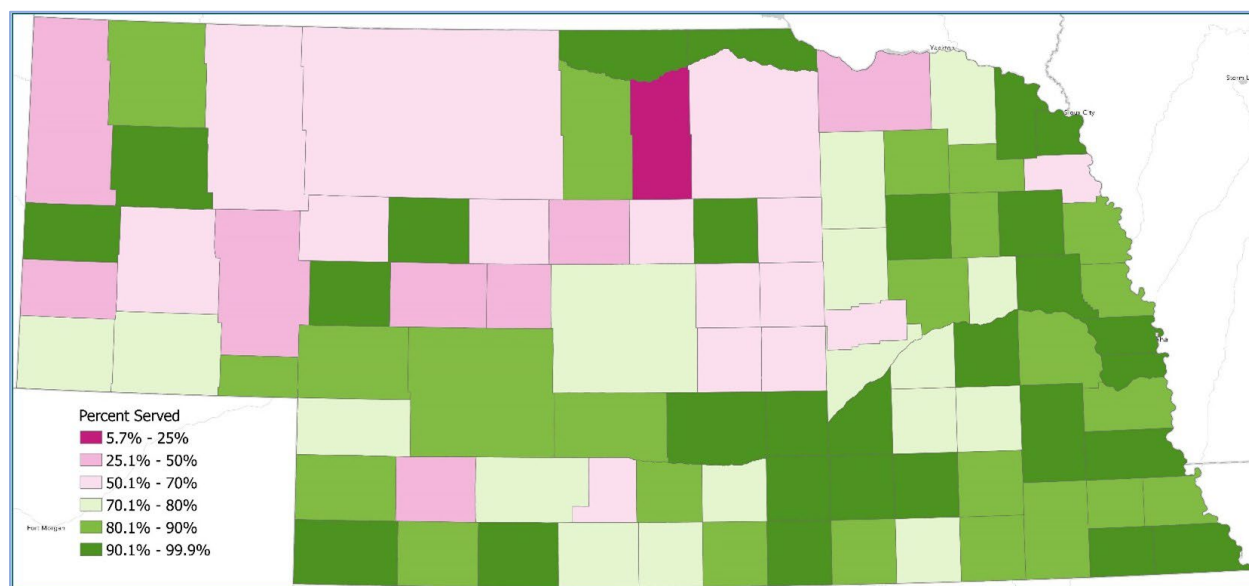


Figure 4 shows the percentage of locations served by county as of October 2024.

Figure 4.

³³ Based on FCC Broadband Serviceable Location Fabric Version 6 data and FCC BDC Program data as of October 15, 2025. These data sets do not include preliminary BEAD awards or other recent state/federal broadband deployment awards (considered enforceable commitments which will identify as served).

For Comparison, **Figure 5** shows the percentage of locations served by county as of October 2025.

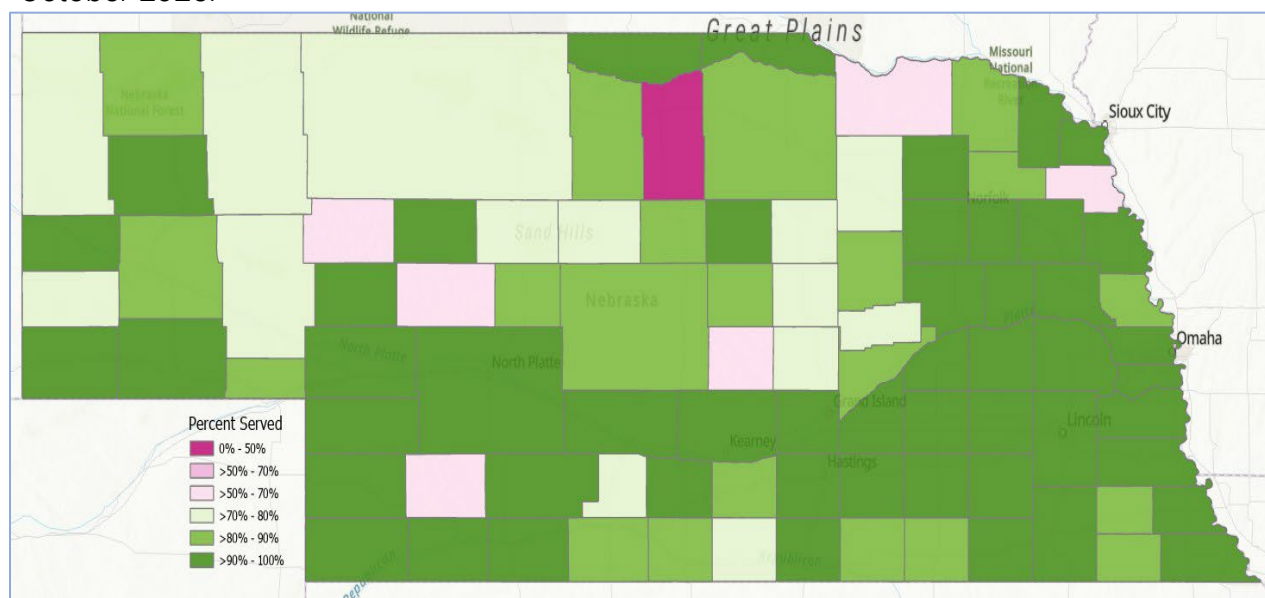


Figure 5.

As of October 2025, Nebraska counties average 87.36% BSLs are reported as served. Additionally, 50 Counties are more than 90% served and Boyd County is reported as being 100% served. 41 counties range between less than 90% and 53% served, while Rock County has only 7.39% of BSLs reported as served.³⁴

While significant progress has been made in improving average broadband service in Nebraska, it is evident that further progress remains to be made in connecting the outstanding underserved and unserved locations.

Technology Summary

One factor contributing to service discrepancies is the type of technology available. Nebraska residents have the opportunity to subscribe to many different types of technologies. The type of technology used to provide service often impacts the service speeds available to a location. The following is an overview of the main types of broadband technologies.

Fiber

Fiber-optic broadband, colloquially known as “fiber,” is an extremely fast broadband connection that can reach speeds of up to 10 Gbps. This technology uses glass cables that can send data at a rate that is 70% the speed of light and is resilient to severe weather conditions when compared to other types of technology. Rather than using electricity to transfer data like other technologies, fiber utilizes light to transmit

³⁴ This should be considered a snapshot of current conditions as the underlying data is regularly updated.

information along fibers which are bundled together into cables. Fiber is widely considered to be the fastest and most reliable technology commonly available.

Fixed Wireless

Fixed wireless internet uses radio waves sent from a tower to a subscriber's house through an exterior receiver (i.e., an antenna). This requires the construction of a tower in the vicinity (typically within five miles) of the subscriber, a fiber connection to the cell tower itself, and relatively few geographic or other obstructions between the tower and the subscriber. Fixed wireless is a great solution for locations that cannot otherwise be served through physical cable connections as it operates on radio waves.

Fixed wireless is either licensed fixed wireless or unlicensed fixed wireless. The term licensed or unlicensed refers to the spectrum the service provider is using to provide connectivity. Licensed fixed wireless uses private spectrum licensed from the FCC. This spectrum offers guaranteed capacity and stability by ensuring sole access to that spectrum for service. In contrast, unlicensed fixed wireless uses spectrum that does not require a license and is available for public use. As a result, unlicensed fixed wireless is less reliable than licensed fixed wireless as non-subscriber users may make use of the same spectrum at the same time. This may lead to the degradation of or disruption to service.

Digital Subscriber Line (DSL)

DSL is a type of technology that transmits digital data on telephone lines. This technology can deliver internet access and phone calls simultaneously, distinguishing it from dial-up. Because the information is transmitted via copper telephone wires, this technology is also colloquially referred to as "copper." While laboratory settings have produced high speeds, digital subscriber line subscribers typically receive service download speeds ranging from 256 kilobit/s up to 25 megabit/s. In comparison, the standard download speed for a location to be considered served is 100 megabit/s.

Cable

Cable broadband uses coaxial cable technology which is the same type of cable technology that TV service uses. It is often widely available in urban and suburban areas bundled with TV service. This technology relies on a coaxial wire that originates at an Internet Service Provider (ISP) access point to the modem located within the house of the subscriber. The service speeds offered by cable broadband technology are typically faster than DSL technology.

Low Earth Orbit (LEO) Satellite

LEO satellite broadband uses constellations of satellites orbiting Earth at altitudes between 111 and 1,242 miles to deliver service to subscribers with receivers (i.e., a satellite dish) installed. LEO service relies on clear line of sight to a part of the satellite constellation for optimal service. LEO technology is accepted as being capable of speeds

necessary to consider a location served, however concerns exist regarding the capabilities of LEO service in areas where many subscribers are within proximity to each other.

Deployment Cost

The cost to deploy broadband infrastructure varies significantly depending on factors including the type of technology, density of locations built to, and the locations proximity to existing network infrastructure. Broadband infrastructure technologies vary in cost to deploy based on their components and associated costs. The density of locations can influence the cost of deploying by limiting the ability of providers to defray deployment costs across multiple locations and expected subscribers. Lastly, the proximity of a location to existing infrastructure will impact the cost of deploying by influencing whether and how much additional network infrastructure will need to be constructed to connect the location(s) to the network.

These factors, in combination, influence the private investment decisions of ISPs to deploy broadband infrastructure to expand their subscriber base. By their nature the locations not yet built to with broadband infrastructure are not immediately appealing for ISPs to deploy to through private investment alone. Broadband infrastructure subsidy programs attempt to mitigate these factors to encourage buildout to areas where private investment has not deployed. However, the provision of broadband infrastructure subsidies does not guarantee that providers will seek to deploy broadband to that location or area.

Strategic Plan Updates

III. Provide any updates to the strategic plan.

The Nebraska Strategic Broadband Plan was developed in 2023 through engagement with stakeholders and industry leaders from a diverse set of backgrounds. Meetings took place in-person and virtually between February and July of 2023. As a living document, the plan will continue to get updated as feedback is received, programs are developed, and technology is improved. NBO understands that any plans implemented now need to be created with the future decades ahead in mind. A copy of the Nebraska Strategic Broadband Plan can be viewed in **Annex A**.

Table 6 is a dashboard of current strategic plan metrics. Information is updated as available.³⁵ See **Appendix C** for references.

		2023	2024	2025	2026
1.1	Served Locations	760,604	768,889	755,184	-
1.1	Unserved Locations	21,482	17,574	13,049	-
1.1	Underserved Locations	16,362	11,985	25,285	-
1.3	Broadband Map	Ongoing	Ongoing	Ongoing	-
2.1	Digital Equity Plan	Complete	Complete	Complete	-
2.2	Connected Libraries	97%	98%	-	-
2.3	ACP Enrollment	92,238	78,665	-	-
2.4	Fiber Connected Libraries	52%	56%	-	-
2.5	Household Without Device	37%	-	-	-
3.1	Precision Farming Operations	55%	-	41%	-
3.1	Farm Broadband Access	-	-	54%	-
3.2	Industry Jobs	1,250	1,190	-	-
3.4	Business Formation	21,586	20,579	14,133*	-
4.1	Stakeholder Meetings	116	201	110	-
5.1	NUSF Funding	\$18,186,289.47	\$25,972,079.01	\$19,737,168.23	-

Table 6.

³⁵ Some references lack yearly updates, “-” indicates data is unavailable for that year. “*” indicates data is incomplete as of submission of this report.

Nebraska Broadband Office's Outreach

IV. Summarize the Nebraska Broadband Office's outreach efforts and collaboration with all interested stakeholders.

NBO's outreach in the report year varied between an emphasis on encouraging participation in the BEAD program and addressing stakeholder concerns following the BEAD Restructuring Policy Notice. Efforts to encourage participation were underway prior to NBO initiating its BEAD subgrantee selection process. NBO remained in contact with local and county officials regarding permitting and involvement opportunities in BEAD process.³⁶ NBO similarly remained in contact with Nebraska's internet service provider community to encourage direct participation in BEAD. NBO capped this initial effort with a virtual townhall³⁷ that discussed the status of the BEAD program and the requirements of the OA on January 10, 2025.

NBO entered a quiet period following the initiation of the subgrantee selection process.³⁸ This was to avoid the perception of collusion, fraud, or abuse as much as it was to avoid actual collusion, fraud, or abuse. NBO also implemented a policy where representatives would only answer questions regarding BEAD applications in writing on its website – transparent and available for all interested parties. NBO limited its engagement with stakeholders as many were now also potential applicants for BEAD. Important program updates were communicated to stakeholders en masse via NBO's email distribution list. Additional program updates were provided to stakeholder groups in virtual townhalls held on June 18, 2025, and October 6, 2025.

Following the release of the BEAD Restructuring Policy Notice, NBO met with non-applicant stakeholders, county officials, and staff representing Nebraska's federal delegation to discuss the changes made to BEAD by the policy notice. These conversations included details of what the policy notice meant for BEAD in Nebraska and how NBO was planning to proceed. These meetings occurred on an as-requested basis with NBO taking proactive steps to keep these stakeholders informed of relevant program updates.

On September 3, 2025, NBO released a draft of the BEAD Final Proposal for a seven-day public comment period. NBO sought input from the public on the draft Final Proposal as required by NTIA. NBO received 14 comments over the totality of the public comment

³⁶ Prior to the BEAD Restructuring Policy Notice, community support was a consideration states could make in determining awards. NBO communicated this opportunity to local stakeholders and potential applicants alike. Note that the BEAD Restructuring Policy Notice removed the consideration that could be given to community support in making award decisions.

³⁷ NBO's virtual townhalls, while sometimes tailored to specific stakeholder audiences, are generally open to the public and are archived on NBO's YouTube page.

³⁸ NBO continued to answer the questions received from constituent stakeholders (i.e., residents with questions about service status of their home) as normal.

period. Comment topics varied but mainly focused on the outcome of BEAD following the changes made by the BEAD Restructuring Policy Notice. The comments were incorporated into the Final Proposal prior to submission to NTIA.

Lastly, Nebraska Broadband Director Patrick Haggerty penned a commentary piece published in the Nebraska Examiner on October 11, 2025. In it he detailed the efforts of NBO and what BEAD will accomplish in Nebraska. This served to inform the wider public of NBO's steadfast efforts to connect every last home and business in light of the RPN.

Nebraska Digital Equity

- V. *Provide an update on efforts to promote digital equity and inclusion on behalf of Nebraska residents.*

NBO's efforts to promote digital equity and inclusion on behalf of Nebraska residents has been restricted in the report year due to the termination of federal funding for these efforts.

In late 2024 NBO received its notice of award for the Digital Equity Capacity Grant Program administered by the NTIA. Nebraska was awarded \$6,500,627.76 through this program. Throughout Quarter 1 2025 NBO was developing program administration materials and communicating with stakeholders and potential applicants to promote participation in the program. These meetings were intended to be followed by the release of the program request for application and initiation of the subgrantee selection process in Quarter 2 2025. On May 9, 2025, the U.S. Department of Commerce National Institute of Standards and Technology terminated the funding for the Digital Equity Capacity Grant Program. The termination of the funding led NBO to cease development of the program. NBO communicated the termination to stakeholders via email on May 14, 2025.

The Digital Equity Competitive Grant Program, a \$1.25 billion program administered by NTIA, has also had its funding terminated on May 9, 2025. It sought to support efforts to achieve digital equity, promote digital inclusion activities, and spur greater adoption and meaningful use of broadband among covered populations. State broadband offices were not eligible to apply for this funding but could facilitate the applications of eligible private entities. In 2024 NBO was successful at bringing together interested parties to collaborate on applications. NBO was informed by its partners that several applications were submitted by Nebraska-based entities. However, no Nebraska-based entity was awarded.³⁹ The termination of the grant funding has led to the halt of awards and activities funded by the program.⁴⁰

³⁹ Communication Service for the Deaf, Inc., a non-profit headquartered in Texas, included Nebraska as a state they would conduct activities in as part of their award.

⁴⁰ The National Digital Inclusion Alliance filed a lawsuit on October 8, 2025, in the U.S. District Court for the District of Columbia seeking reinstatement of the Digital Equity Competitive Grant Program.

Federal Broadband Advocacy

VI. Provide an update on state advocacy on broadband issues being conducted at the federal level.

NBO's advocacy focus during the report year has been on advocating for Nebraska's retention of the remaining BEAD funds for non-deployment uses. Prior to the BEAD Restructuring Notice, the expectation⁴¹ was that funds not allocated to broadband infrastructure deployment awards could be used for non-deployment purposes. With the BEAD Restructuring Policy Notice NTIA indicated that funding for non-deployment use was under review and rescinded all previously approved non-deployment uses. NBO believes the substantial remaining amount of BEAD funding available to Nebraska would best be used to invest in Nebraska to fully leverage the connectivity brought by BEAD. As part of the Final Proposal submission to NTIA, NBO outlined initiatives in precision agriculture, telehealth, and AI readiness that it would pursue with the remaining funds. NBO has also coordinated with other state officials and Nebraska's federal delegation to advocate for state retention of remaining BEAD funds for non-deployment use.

Additionally, NBO moved quickly to begin its BoB round based on NTIA's 90-day deadline for Final Proposal submission in the BEAD Restructuring Policy Notice. Nebraska was among the first in the country to do so - however NTIA provided additional guidance regarding what states could consider in making priority project determinations. NBO was in the midst of the subgrantee selection process when this guidance was issued and believed that it would benefit Nebraska to incorporate that guidance. However, doing so would require an extension of NBO's deadline for Final Proposal submission. Recognizing that Nebraska's interests would be best served if that guidance were incorporated, NBO coordinated with Nebraska's federal delegation to advocate for NTIA approval of a waiver requesting extension of NBO's Final Proposal submission deadline. This advocacy succeeded in seeing NBO's deadline extension request being approved by NTIA and allowed NBO to incorporate the guidance.

NBO supports Senator Deb Fischer's package of precision agriculture legislation composed of the PRECISE Act, the LAST ACRE Act, and the PAL Act. These bills seek to help America's farmers to harness the full potential of precision agriculture through increasing adoption of precision agriculture technologies and increasing broadband connectivity to farmland and ranchland. Nebraska would benefit greatly from such investment given the state's extensive agricultural industries. Additionally, NBO supports multiple avenues of precision agriculture investment in Nebraska to further enhance Nebraska's leadership in agriculture. These investments will help Nebraska to fully

⁴¹ NBO did not anticipate having significant BEAD funds remaining following awards prior to the BEAD Restructuring Policy Notice, but the statutory language of the IIJA and the BEAD Notice of Funding Opportunity are clear in the intention for remaining funds to be used in non-deployment projects.

leverage the connectivity brought by the BEAD program and sustain benefits well into the future.

NBO will continue to advocate for broadband issues affecting Nebraska on the federal level.

Appendix A – NUSF-131 Award & Location Details

Table A1 summarizes the 2024 NUSF-131 1st Reverse Auction. Included is the winning bidder (company), auction name,⁴² the total awarded amount, and the completion deadline for awarded locations. Note this table sums the entirety of a company's awards through the 2024 NUSF-131 1st Reverse Auction and rows do not represent a unique project.

Company	Auction Name	Total Awarded	Deadline
Great Plains Communications LLC	Frontier Auction	\$2,260,862.35	3/26/2026
Great Plains Communications LLC	Windstream Auction	\$1,286,942.34	3/26/2026
Hamilton Consortium	Frontier Auction	\$864,335.11	3/26/2026
Hamilton Consortium	Windstream Auction	\$598,421.08	3/26/2026
Midstates Data Transport, LLC	Frontier Auction	\$7,036,406.31	3/26/2026
Pinpoint Communications, Inc.	Frontier Auction	\$5,073,762.88	3/26/2026
Pinpoint Communications, Inc.	Windstream Auction	\$3,841,517.04	3/26/2026
Total		\$20,962,247.11	

Table A1.

⁴² The Auction Name identifies the exchange within which the awarded census block groups are located. The map of exchange areas is available on the PSC website on the Telecommunications page.

Table A2 summarizes the 2024 NUSF-131 2nd Reverse Auction. Included is the winning bidder (company), auction name, bidding tier, total awarded amount, and the completion deadline for awarded locations. Note this table sums the entirety of a company's awards through the 2024 NUSF-131 2nd Reverse Auction and does not represent a unique project.

Company	Auction	Tier	Award	Deadline
Great Plains Communications LLC	2 nd NUSF-131 Citizens	Gigabit Tier (1 Gbps/500 Mbps)	\$223,160.71	9/30/2026
Great Plains Communications LLC	2 nd NUSF-131 Qwest	Gigabit Tier (1 Gbps/500 Mbps)	\$1,220,267.47	9/30/2026
Great Plains Communications LLC	2 nd NUSF-131 UTC	Gigabit Tier (1 Gbps/500 Mbps)	\$1,134,156.64	9/30/2026
Great Plains Communications LLC	2 nd NUSF-131 Windstream	Gigabit Tier (1 Gbps/500 Mbps)	\$393,813.26	9/30/2026
Hamilton Consortium	2 nd NUSF-131 Citizens	Gigabit Tier (1 Gbps/500 Mbps)	\$379,828.63	9/30/2026
Hamilton Consortium	2 nd NUSF-131 Qwest	Gigabit Tier (1 Gbps/500 Mbps)	\$278,802.25	9/30/2026
Hamilton Consortium	2 nd NUSF-131 Windstream	Gigabit Tier (1 Gbps/500 Mbps)	\$151,574.62	9/30/2026
Pinpoint Communications, Inc.	2 nd NUSF-131 Citizens	Gigabit Tier (1 Gbps/500 Mbps)	\$2,237,341.12	9/30/2026
Pinpoint Communications, Inc.	2 nd NUSF-131 Qwest	Gigabit Tier (1 Gbps/500 Mbps)	\$1,099,480.33	9/30/2026
Pinpoint Communications, Inc.	2 nd NUSF-131 Windstream	Gigabit Tier (1 Gbps/500 Mbps)	\$1,497,455.09	9/30/2026
Windstream Nebraska, Inc.	2 nd NUSF-131 Windstream	Gigabit Tier (1 Gbps/500 Mbps)	\$623,826.99	9/30/2026
Glenwood Telecommunications, Inc.	2 nd NUSF-131 Qwest	Gigabit Tier (1 Gbps/500 Mbps)	\$906,146.31	9/30/2026
Glenwood Telecommunications, Inc.	2 nd NUSF-131 Windstream	Gigabit Tier (1 Gbps/500 Mbps)	\$2,673,213.74	9/30/2026
Consolidated Telephone Company	2 nd NUSF-131 Qwest	Baseline Tier (100 Mbps/100 Mbps)	\$1,175,474.77	9/30/2026
Consolidated Telephone Company	2 nd NUSF-131 UTC	Baseline Tier (100 Mbps/100 Mbps)	\$370,214.73	9/30/2026
Northeast Nebraska Telephone Company	2 nd NUSF-131 Qwest	Baseline Tier (100 Mbps/100 Mbps)	\$2,205,278.48	9/30/2026
Total			\$16,570,035.14	

Table A2.

Table A3 details the number of locations to be served by 2024 NUSF-131 2nd Reverse Auction awards by auction.

Company	Citizens	Qwest	UTC	Windstream	Total
Consolidated Telephone Company	-	97	11	-	108
Glenwood Telecommunications, Inc.	-	119	-	150	269
Great Plains Communications LLC	12	126	30	16	184
Hamilton Consortium	12	14	-	9	35
Northeast Nebraska Telephone Company	-	220	-	-	220
Pinpoint Communications, Inc.	171	93	-	153	417
Windstream Nebraska, Inc.	-	-	-	25	25
Grand Total	195	669	41	353	1,258

Table A3.

Appendix B – Capital Projects Fund 2 Project Details

CPF-2 grant awards were issued on June 4, 2024. CPF-2 projects have a completion deadline of December 25, 2025. **Table B1** summarizes CPF-2 projects.

Applicant	Project Name	Locations Served	Grant Award
ALLO Communications LLC	Blue River Lodge/Saline County Rural	107	\$760,354.00
ALLO Communications LLC	East Valentine	63	\$320,912.00
ALLO Communications LLC	North Ogallala*	625	\$3,610,697.00
ALLO Communications LLC	North Scottsbluff	67	\$266,886.00
ALLO Communications LLC	Scotts Bluff National Monument	5	\$121,103.00
ALLO Communications LLC	South Bridgeport	18	\$225,698.00
ALLO Communications LLC	Village of Bradshaw	260	\$594,074.00
ALLO Communications LLC	Wayne Rural - Wakefield	13	\$539,639.00
ALLO Communications LLC	West Valentine	46	\$275,235.00
Glenwood Telecommunications, Inc.	Heartwell	46	\$364,217.08
Glenwood Telecommunications, Inc.	Kearney County	59	\$1,005,167.02
Glenwood Telecommunications, Inc.	Prosser	84	\$1,417,886.03
Great Plains Communications LLC	Project Brunswick*	130	\$1,120,098.28
Great Plains Communications LLC	Project Emmet*	56	\$381,651.52
Great Plains Communications LLC	Project McCook South*	108	\$1,161,237.12
Inventive Wireless of Nebraska, LLC dba Vistabeam	Garden-NBBP-HWY26	163	\$2,974,350.00
Inventive Wireless of Nebraska, LLC dba Vistabeam	Kimball-NBBP-Kimball	202	\$903,336.00
Inventive Wireless of Nebraska, LLC dba Vistabeam	Morrill-NBBP-HWY26*	154	\$1,420,250.00
Inventive Wireless of Nebraska, LLC dba Vistabeam	ScottsBluff-NBBP-Lyman*	21	\$413,725.00

*Table B1, cont. * Denotes that a deadline extension has been granted.*

Applicant	Project Name	Locations Served	Grant Award
Inventive Wireless of Nebraska, LLC dba Vistabeam	ScottsBluff-NBBP-North	63	\$1,931,875.00
Inventive Wireless of Nebraska, LLC dba Vistabeam	ScottsBluff-NBBP-South	45	\$1,702,215.00
Midstates Data Transport, LLC d/b/a Stealth Broadband	Boone County West Unserved*	128	\$2,197,650.83
Northeast Nebraska Telephone Company	Polk County*	176	\$3,777,885.00
Pinpoint Communications, Inc.	Beaver City to Wilsonville	15	\$900,000.00
Pinpoint Communications, Inc.	Edison to Beaver City	8	\$742,500.00
Pinpoint Communications, Inc.	Syracuse to Palmyra*	69	\$1,125,000.00
Qwest Corporation d/b/a CenturyLink QC	Farwell	121	\$414,920.00
Spectrum Mid-America, LLC, managed by Charter Communications, Inc.	Charter Communications – Sherman County	361	\$252,871.00
Total		3,213	\$ 30,921,432.88

Table B1. * Denotes that a deadline extension has been granted.

Appendix C – Nebraska Strategic Broadband Plan Dashboard References

Reference:

- 1.1 - Nebraska Broadband Map Data, available from <https://experience.arcgis.com/experience/7dcc2182601a4b339ab687f673a9811f>.
- 2.2, 2.4 - Public Library Statistical Data, available from the Nebraska Library Commission at <https://nlc.nebraska.gov/stats/statlist.aspx>.
- 2.3 - ACP Funding Summary by Geography, available from the Universal Service Administration Company at <https://www.usac.org/about/affordable-connectivity-program/acp-enrollment-and-claims-tracker/#:~:text=The%C2%A0ACP%20Funding%20Summary>.
- 2.5 - 2023 American Community Survey B28010, available from the United States Census Bureau at https://data.census.gov/map/040XX00US31/ACSDT1Y2023/B28010?q=access%20to%20computer&layer=VT_2023_040_00_PP_D1&loc=41.5182,-99.9160,z6.9022
- 3.1 - Nebraska – Table 77 – Land Use Practices (pg.224) - Use of Precision Ag Practices, USDA Census of Agriculture available at https://www.nass.usda.gov/Publications/AgCensus/2022/Full_Report/Volume_1,_Chapter_1_State_Level/Nebraska/st31_1_077_077.pdf, and USDA National Agricultural Statistics Service Technology Use (Farm Computer Usage and Ownership) estimates, available at https://www.nass.usda.gov/Publications/Todays_Reports/reports/fmpc0825.pdf.
- 3.2 - Occupational Employment Projections – Telecommunications Equipment Installers and Repairs, Except Line Installers, available from NEworks Occupation Employment Projections Download Center at <https://neworks.nebraska.gov/vosnet/gsipub/documentView.aspx?enc=EV+mnVfK6qRWnoXwN+RfXg==>, and U.S. Bureau of Labor Statistics Occupational Employment and Wage Statistics, May 2023, available at <https://www.bls.gov/oes/2023/may/oes499052.htm>, and Occupational Employment and Wage Statistics Query System available at <https://data.bls.gov/oes/#/geoOcc/Multiple%20occupations%20for%20one%20geographical%20area>.
- 3.4 - Business Formation Statistics, available from the United States Census Bureau at [https://www.census.gov/econ/currentdata/?programCode=BFS&startYear=2023&endYear=2023&categories\[\]=TOTAL&dataType=BA_BA&geoLevel=NE&adjusted=1¬Adjusted=0&errorData=0](https://www.census.gov/econ/currentdata/?programCode=BFS&startYear=2023&endYear=2023&categories[]=TOTAL&dataType=BA_BA&geoLevel=NE&adjusted=1¬Adjusted=0&errorData=0)

Appendix D – Quality of Broadband Service Details

Table D1 details the number of broadband serviceable locations per county by service classification based on FCC BSL Fabric Version 6 and FCC Broadband Data Collection program data as of October 15, 2025.

County	Served	Underserved	Unserved	Total
Adams	13,507	24	22	13,553
Antelope	3,392	487	387	4,266
Arthur	270	2	-	272
Banner	391	47	81	519
Blaine	313	21	63	397
Boone	2,924	176	252	3,352
Box Butte	5,337	18	24	5,379
Boyd	1,780	-	-	1,780
Brown	1,873	94	237	2,204
Buffalo	17,760	951	205	18,916
Burt	4,459	27	61	4,547
Butler	4,612	306	144	5,062
Cass	12,741	317	167	13,225
Cedar	4,213	430	261	4,904
Chase	2,339	19	57	2,415
Cherry	2,702	523	406	3,631
Cheyenne	5,117	160	80	5,357
Clay	3,891	22	2	3,915
Colfax	4,570	81	98	4,749
Cuming	4,775	35	43	4,853
Custer	5,566	498	576	6,640
Dakota	7,240	109	198	7,547
Dawes	3,574	352	327	4,253
Dawson	9,918	804	230	10,952
Deuel	1,173	115	31	1,319
Dixon	2,886	130	168	3,184
Dodge	16,115	194	119	16,428
Douglas	185,597	506	186	186,289
Dundy	1,328	6	4	1,338
Fillmore	3,666	90	9	3,765
Franklin	1,822	240	233	2,295
Frontier	1,587	104	32	1,723
Furnas	2,826	417	40	3,283

Table D1, cont.

County	Served	Underserved	Unserved	Total
Gage	10,884	274	99	11,257
Garden	1,265	98	256	1,619
Garfield	1,172	26	13	1,211
Gosper	1,050	357	35	1,442
Grant	312	113	36	461
Greeley	1,105	299	148	1,552
Hall	22,198	400	33	22,631
Hamilton	4,968	7	1	4,976
Harlan	2,474	472	48	2,994
Hayes	354	101	208	663
Hitchcock	1,900	77	104	2,081
Holt	5,633	906	91	6,630
Hooker	471	5	25	501
Howard	2,709	509	249	3,467
Jefferson	4,148	185	139	4,472
Johnson	2,509	203	159	2,871
Kearney	2,863	579	116	3,558
Keith	5,675	117	72	5,864
Keya Paha	681	6	35	722
Kimball	2,224	108	114	2,446
Knox	3,533	1,023	1,160	5,716
Lancaster	104,290	808	239	105,337
Lincoln	14,814	1,171	366	16,351
Logan	383	6	64	453
Loup	469	52	8	529
Madison	14,156	290	57	14,503
McPherson	159	43	89	291
Merrick	3,971	298	168	4,437
Morrill	2,549	144	265	2,958
Nance	1,753	245	213	2,211
Nemaha	3,791	135	100	4,026
Nuckolls	2,745	205	115	3,065
Otoe	7,601	220	143	7,964
Pawnee	1,861	137	80	2,078
Perkins	1,664	45	59	1,768
Phelps	4,304	432	8	4,744
Pierce	3,903	100	72	4,075
Platte	14,366	102	30	14,498
Polk	3,210	152	32	3,394
Red Willow	5,537	64	28	5,629

Table D1, cont.

County	Served	Underserved	Unserved	Total
Richardson	4,900	170	34	5,104
Rock	87	1,084	6	1,177
Saline	6,326	160	63	6,549
Sarpy	64,184	265	63	64,512
Saunders	10,477	492	410	11,379
Scotts Bluff	16,900	10	23	16,933
Seward	7,435	551	223	8,209
Sheridan	2,631	255	510	3,396
Sherman	1,543	541	123	2,207
Sioux	760	43	254	1,057
Stanton	2,704	148	94	2,946
Thayer	2,882	413	232	3,527
Thomas	390	97	27	514
Thurston	1,565	1,023	139	2,727
Valley	2,130	239	235	2,604
Washington	7,425	1,387	128	8,940
Wayne	3,411	318	205	3,934
Webster	2,198	64	129	2,391
Wheeler	566	16	128	710
York	6,752	190	3	6,945

Table D1.

Annex A – Nebraska Strategic Broadband Plan

Nebraska Strategic Broadband Plan



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Executive Summary

Overview

Broadband enables essential activities of residents and improves society through different channels such as economic development, healthcare, public safety, government services, and education. The country will see the largest ever investment in broadband by the federal government, of over \$100 billion nationwide, with Nebraska receiving \$405 million in funding over the next 5 years through the Broadband Equity, Access, and Deployment (BEAD) Program. On January 6, 2023, Governor Jim Pillen issued Executive Order 23-02 to establish the Nebraska Broadband Office housed within the Nebraska Department of Transportation.

The purpose of the Nebraska Broadband Office is to provide for policy level direction and coordination across all levels of government to reach the goal of connecting 100% of Nebraska households to high-speed Internet by 2027. Therefore, the Nebraska Broadband Office, in coordination and consultation with impacted stakeholders across the State, developed the Nebraska Strategic Broadband Plan. Included in the Nebraska Strategic Broadband Plan are four goals geared towards addressing issues in the realms of connectivity, digital equity, digital economy, and stakeholder engagement. State and federal funding is critical to ensure the state can accomplish these goals.

Disclaimer: The Nebraska Strategic Broadband Plan is subject to changes based on internal and external stakeholder feedback that will be solicited on an ongoing basis. The execution of the strategies, goals, and metrics identified in the Plan relies on the funding timelines of the Federal Communication Commission (FCC) and National Telecommunications Information Administration (NTIA). Programs administered by these agencies are evolving and the timelines are not always known. The Nebraska Broadband Office will review the Plan and update it as new information is made available.

Problem Statement

In Nebraska, 13.26% of locations are unserved or underserved, and 105,000 households lack acceptable access to the internet. A consequence of limited access includes an unfavorable business case for investment, especially in rural areas. The primary drivers for the adoption gap are affordability, devices, and literacy. The Nebraska Strategic Broadband Plan identifies strategies that will address gaps to expand access and close the digital divide.

Recommendations

Through the American Rescue Plan Act (ARPA), Infrastructure, Investment and Jobs Act (IIJA), and E-Rate Special Construction (E-Rate), state and local governments have access to federal funding resources to bridge the digital divide. Per BEAD, Nebraska now has a mandate to connect every unserved location across the State, turning broadband deployment into a strategic imperative at a local level. Based on these opportunities, the Nebraska Strategic Broadband Plan includes recommendations to achieve specific goals. The implementation of these goals can be found in detail in the Goals and Action sections below.

Goal One: Bolster economic opportunity by connecting 100% of residents, particularly those in rural communities, to high-speed Internet by 2027.

Strategies:

1. Prioritize deployment and target funding in areas where a negative business case for private investment for the unserved and under-served exists.
2. Set an extreme high cost per location threshold for difficult to serve areas.
3. Utilize location-level mapping and analytics to assess areas of critical need and to target unserved and underserved areas.

Goal Two: Expand digital inclusion and adoption to achieve affordability, access, and digital literacy by 25% by 2027.

Strategies:

1. Conduct a landscape analysis of existing digital literacy programs and develop strategies to address any gaps.
2. Conduct digital navigator pilots within targeted populations, evaluate strategies that work and leverage public-private partnerships to build skills and confidence in the use of technology.
3. Partner with libraries across the State to provide opportunity for every library access to a fiber Internet service of 1Gbps or greater.

Goal Three: Enable Nebraska to thrive by fostering and supporting a digital economy by 2027.

Strategies:

1. Expand workforce development programs to prepare and support industry to address labor shortages that are barriers to deployment.
2. Improve delivery of government services by leveraging technology to facilitate a culture of innovation and efficiency.
3. Ensure investments in broadband leverage existing strategies and programs already in place to improve the digital economy.

Goal Four: Develop robust collaboration across Nebraskan communities through strategic planning of broadband and digital equity to ensure that all unserved, underserved, and underrepresented communities are connected.

Strategies:

1. Link the operations of infrastructure and public, private and community broadband networks to encourage collaboration and ensure economic resiliency.
2. Leverage broadband to support public safety infrastructure.

Goal Five: Ensure the long-term sustainability of deployed infrastructure necessary to preserve access by all Nebraskans to affordable and reliable communications services provided by broadband capable networks.

Strategies:

1. Encourage Federal and Nebraska policymakers to modernize the FUSF and NUSF.
2. Determine alignment of FUSF support programs (i.e., A-CAM and “Legacy” programs) with Nebraska broadband policies, including NUSF.
3. Ensure that long-term commitments are satisfied under state administered broadband deployment grant programs other than FUSF and NUSF programs.

Key Findings

The Nebraska Strategic Broadband Plan includes ten key findings: (1) build the capabilities of the broadband office, (2) set a vision and run diagnostics to align policy objectives and feasibility studies to achieve program goals, (3) build location-level mapping & analytics capabilities, (4) set deployment strategies, (5) design a competitive and nimble granting process that ensures competition, (6) execute and evaluate proposals based on robust criteria that considers viability and the efficient use of funds, (7) set up oversight functions and report on results, (8) ensure external stakeholder engagement, (9) establish strong internal project management and (10) consider additional funding for broadband to ensure the long term sustainability for these one-time capital investments. The goals, actions and key findings will ensure successful implementation of the Nebraska Strategic Broadband Plan.

Next Steps

The Nebraska Strategic Broadband Plan outlines short and long-term steps to bridge the digital divide. In the short-term, the Broadband Office needs to continue assessing office-level capabilities and baseline the current state of broadband access across Nebraska. Ongoing refinement of individual grant strategies through federal and state funding is necessary in mobilizing to execute funding. The Broadband Office in partnership with the Public Service Commission and state leadership must identify risks and conduct mitigation planning to avoid barriers to deployment and adoption.

The long-term steps include consideration of permanent funding for the sustainability of the state’s broadband infrastructure and programs. It is also important that the Broadband Office engage and coordinate with stakeholders throughout the process. Nebraska will apply for every funding opportunity offered through the US Treasury Department and NTIA. The share of funding that Nebraska will receive is \$405M over the next 5 years. The next steps are to develop a competitive grant program for BEAD that includes criteria and matching requirements for sub-recipients and update the Plan annually as broadband programs evolve.

Conclusion

The establishment of Nebraska Strategic Broadband Plan was the first step in providing clear direction with the goal of connecting 100% of households to high-speed broadband and developing plans to implement effective strategies. The historic funding available through the BEAD program will result in unprecedented opportunities to accomplish the goals of the Nebraska Strategic Broadband Plan and bridge the digital divide. The Broadband Office is uniquely positioned to successfully leverage resources where they are needed most in Nebraska. Accelerating broadband will bolster Nebraska's economy, improve resiliency, help communities thrive, and ensure that everyone has access to essential activities and services needed for a better quality of life.

Roadmap to Connect 100% by 2027 Table

The Nebraska Strategic Broadband Plan will connect 100% of Nebraskans to high-speed Internet by 2027. The following table is a projection of the percentage of residents that the Broadband Office proposes to connect through 2027. Included is the percent of funding that will be utilized per federal programs each year. The success of connecting residents to broadband by the projected date is based on variables that the Broadband Office does not influence.

Projections are subject to the following variables:

- Completion of Nebraska mapping by the FCC
- Completion of the challenge process by the FCC
- The total amount allocated by the NTIA for BEAD
- The time of funding allocations made available by the NTIA for BEAD
- Grant awards to sub-recipients to the NTIA for middle mile
- Labor and supply chain delays
- Local permitting, easement, and right-of-way delays
- Dynamics that impact the drivers of adoption
- Complete applications by sub-recipients
- State procurement and contracting process
- Completion and closeout of construction of broadband projects
- Compliance and monitoring of sub-recipients

Connectivity and Funding Utilization Percentage Table*

	2023	2024	2025	2026	2027***	Total
% of Households Connected	86.7%	89%	93%	95%	100%	100%
Federal & State Program Utilization						
E-Rate	20%	20%	20%	20%	20%	100%
Bridge**	20%	20%	20%	20%	20%	100%
CPF	50%	50%	0%	0%	0%	100%
DE	53%	47%	0%	0%	0%	100%
BEAD	0%	25%	50%	25%	0%	100%
EMM	0%	20%	40%	40%	0%	100%

*Projections are predictions and based on variables that the Broadband Office does not influence. The table is based on the draw-down of funds. The Internet gap is defined as residents who do not receive at least 100/20 mbps.

**Bridge is a state funded program administered by the Nebraska Public Service Commission, and is an ongoing program

***All federal programs are required to be executed by 2027

Broadband Goals and Actions

To accomplish the strategies identified in the Nebraska Strategic Broadband Plan, the Nebraska Broadband Office has developed a list of goals to orient any State plan or program. Since the state's broadband program is a new initiative, revisiting and refining the implementation plan will be necessary. Incremental evaluation is included and required to benchmark success against different strategies and report regularly to elected officials on progress to ensure transparency.

Goal 1: Bolster economic opportunity by connecting every Nebraskan household and business to high-speed internet

Universal access to broadband will bring significant economic opportunities. Developing high-speed networks, however, is an expensive proposition. Network deployment should maximize the scalability of that network to minimize future investments required to meet evolving consumer needs. This concept is referred to as the deployment of a "future proof" network. The State's broadband policies give preference to symmetrical speeds of 100/20Mbps or higher. The grant program design must be nimble and competitive as Nebraska is a high-cost state and criteria will include incentives for investment in rural areas with critical need. Successful grant applicants will include both last and middle mile infrastructure and where necessary, may involve the use of alternative technologies.

Strategy 1.1

Target State grants and programs to unserved or underserved areas where private investment alone cannot sustain the investment needed to provide 100/20 Mbps broadband service.

Activities:

- Design grant programs which encourage investment by providers, grantees, and other stakeholders. Such programs shall:
 - Encourage partnerships, including public-private partnerships and network deployment projects where business risk can be shared, and existing infrastructure can be used to extend broadband service.
 - Weigh past performance of broadband service suppliers and quantify the local and statewide impacts of proposed projects.
 - Connect all unserved homes and businesses, taking into consideration state and federal regulations, the economic impact of a proposed project, and the maximization and efficient use of the limited funding resources available.
 - Utilize available public funds to connect important economic drivers in rural areas that will lead to further economic development.
- Invest in community anchor institutions (CAI) through Network Nebraska where possible to provide reliable high-speed access.
- The Nebraska Broadband Office will monitor and review the design, engineering, site prep, construction, close-out, and performance of last and middle-mile projects to ensure that investments are built on time and to design specifications per contract terms and conditions.
 - Provide updates on public facing milestones that track easily understood progress such as Grant awarded, Design completed, Materials ordered, Materials received, Construction started, etc.

Performance Metrics:

- Increase broadband access (minimum 100/20) for households and businesses to 100%
- Work with tribes to increase the number of homes and businesses on tribal lands connected to broadband speeds of 100/20 mbps.

Strategy 1.2

Maximize private funding and investment in broadband buildouts to provide broadband service of 100/20Mbps.

Activities:

- Incentivize private broadband investment through use of State and local assets such as access to State and local Right of Ways.
- Encourage regional broadband planning and promote state and local projects that will serve largely unserved areas of the state.

- Where appropriate, utilize existing infrastructure to deploy broadband infrastructure most efficiently in high-cost areas.

Performance Metrics:

- Number of households connected by independently funded broadband projects

Strategy 1.3

Utilize the best available location-level mapping and analytics to assess areas of critical need and to target areas that require subsidies.

Activities¹:

- Initiate a process to obtain inputs from all stakeholders regarding the scope of "necessary information" that is appropriate to request from broadband providers in order to create and keep current the official Nebraska location fabric broadband access map (the "State Broadband Map").
- Create a broadband projects dashboard to inform stakeholders where investments are occurring in the state.
- Provide data layers that aggregate information based on information including, but not limited to;
 - State Senator Districts
 - Counties
 - Public Service Commissioner Districts
 - Economic Development Districts
 - Congressional Districts

Performance Metrics:

- Creation of the Broadband Map
- The Broadband Office has received stakeholder inputs to determine necessary information for completion of the State Broadband Map showing broadband availability and available speed for all serviceable locations in Nebraska as required by Neb. Rev. Stat. section 86-333(1) and (2).
- The Broadband Office, with the assistance of third party contractor(s), has created the State Broadband Map.
- Practices and procedures have been developed by the Broadband Office for periodic updates of the State Broadband Map to keep it as current and accurate as possible.
- Policies and procedures have been implemented to protect the confidentiality of trade secret information provided to the Broadband Office as part of the process for creation of the State Broadband Map.

¹ Information provided to the Broadband Office pursuant to Neb. Rev. Stat. Sec. 86-333(3) for the State Broadband Map shall be subject to applicable confidentiality protections.

Goal 2: Expand digital inclusion and adoption to achieve affordability, access, and digital literacy

Connecting all Nebraskan households to high-speed internet access requires investment in digital equity. Nebraska's digital equity efforts are focusing on affordable access to service, access to internet-enabled devices, and digital literacy. The Nebraska State Digital Equity Plan will support the digital equity strategies of the Nebraska Strategic Broadband Plan and provide more detail.

Strategy 2.1

Conduct a landscape analysis of existing digital equity and affordability programs and develop strategies to address any gaps.

Activities:

- Develop a statewide Digital Equity Plan in partnership with the Office of the Chief Information Officer.

Performance Metrics:

- Completion of State Digital Equity Plan.

Strategy 2.2

Leverage E-rate special construction and ensure that connectivity to network infrastructure is available during emergencies.

Activities:

- Prioritize connectivity at CAIs such as schools, community centers, libraries, and recreation centers.

Performance Metrics:

- Number of libraries connected to high-speed internet.

Strategy 2.3

Address broadband affordability

Activities:

- Increase enrollment in the Affordable Connectivity Program and Lifeline Program by increasing awareness and decreasing barriers.
- Encourage providers currently not participating in the Affordable Connectivity Program to participate.

- Partner with broadband providers to advance digital inclusion efforts targeting low-income households such as training, device refurbishment programs or other programs included in the state digital equity plan.
- Incentivize providers to offer low-cost and affordable service options as an evaluation criterion for broadband grant funding.
- Support continued funding for the Affordable Connectivity Program.

Performance Metrics:

- Increase enrollment by 50% in the Affordable Connectivity Program and the Lifeline program by January 2025 considerate of continued funding.

Strategy 2.4

Expand digital literacy training and support throughout Nebraska.

Activities:

- Build capacity in libraries, senior centers, and other organizations to provide technical support and training by focusing on the following:
 - Increase fiber connectivity.
 - Increase technical support provided by the Nebraska Library Commission (NLC) to help libraries improve network infrastructure, install CIPA-compliant filtering, meet cybersecurity standards for public use technologies, and address the ongoing need for maintenance options.
 - Decrease barriers to providing training and classes in libraries, senior centers, and other organizations.
- Leverage partnerships to expand digital literacy training and support throughout Nebraska, including partnerships with 4-H, schools, and youth organizations.
- Expand access and awareness to digital training resources to households and through the Broadband Office, libraries, and other community anchor institutions.
- Explore funding for targeted digital literacy training programs with a focus on NTIA-defined covered populations with the Digital Equity Capacity Grant.

Metrics:

- Increase the percentage of Nebraska libraries with fiber connections by 2027
- Increase the percentage of Nebraska libraries with at least one up to date laptop or desktop computer by 2027

Strategy 2.5

Expand access to digital devices.

Activities:

- Increase awareness of device refurbishment and repair programs.
- Explore ways to establish or expand device refurbishment programs.
- Explore ways to expand access to affordable device repair services.

Performance Metrics:

- Increase the percentage of Nebraska households with at least one digital device by 2025.

Goal 3: Enable Nebraska to thrive by fostering and supporting a digital economy by 2027

The state plays an important role in supporting the digital economy. Supporting and funding programs that address labor shortages, implementing digital government strategies, removing administrative barriers, increasing efficiencies, and aligning broadband efforts with existing programs will all help foster the digital economy.

Strategy 3.1:

Encourage the utilization of broadband technology to create efficiencies for key industries and constituencies within the state.

Activities:

- Encourage cutting-edge broadband technologies to empower rural and underserved communities by providing interactive medical training, consultation, and real-time telehealth services, thereby enhancing the state's healthcare infrastructure.
- Encourage the use of broadband technologies to support precision farming and resource efficiency techniques in collaboration with agricultural machinery companies, thereby elevating Nebraska's agricultural technology landscape.
- Promote the use of broadband technologies to improve animal welfare, productivity, and promote smart farming practices through remote consultations and real-time livestock monitoring.
- Attract more manufacturing capacity to rural and underserved areas by connecting those communities to high-speed broadband through State grant programs.

Performance Metrics:

- Number of households that can access telehealth services in rural and underserved communities
- Percent increase in agricultural operations utilizing precision farming technologies and resource efficiency.

Strategy 3.2:

Grow workforce development programs to prepare and support industry to address labor shortages in targeted industries.

Activities:

- Coordinate partnerships between the Department of Economic Development, the Department of Labor, the broadband industry, and higher education to take advantage of workforce development programs and strategies to increase deployment-related roles in Nebraska, especially in outdoor and labor-intensive roles (e.g., apprenticeship, technical/vocational training, and school partnerships.)
- Encourage investment in academic curricula for key industries to meet the demands of the digital economy by fostering industry-academia collaboration for research and development and supporting apprenticeship and internship programs.
- Champion business-led initiatives and collaborations that proactively invest in the development of a skilled workforce that is capable of tackling labor shortages in the broadband industry and

adapting to the emergence of new broadband-based technologies.

- Reach out to and partner with employers, unions, community partners, and local organizations focused on workforce development to identify existing training programs and next steps to close the workforce deficit.
- Encourage the engagement of youth early through career academies and workforce development initiatives to ensure a steady supply of skilled professionals to support the growth of the broadband industry and targeted industries.
- Consider partnering with adjacent states to develop a multi-state approach to workforce development to address gaps in deployment related roles.
- Create a landing page on the Nebraska Broadband Office's website containing information on existing workforce development programs and resources.

Performance Metrics:

- Number of effective public-private partnerships supporting workforce development needs for the broadband industry and targeted industries.
- Number of individuals who have successfully participated in a broadband industry or an industry focused workforce development program.
- Number of job placements in the broadband sector and industry focused positions
- Percentage of students who can access and effectively utilize broadband technologies.

Strategy 3.3:

Improve delivery of government services by leveraging technology to facilitate a culture of innovation and efficiency among government agencies.

Activities:

- Develop a Broadband Community Readiness Certification program for local governments to support permitting processes and prioritize those who participate in the program.
- Optimize emergency response by utilizing broadband capabilities to improve emergency response and enhance the Next Generation 911 system for more efficient triaging and responses to emergency calls.
- Promote a culture of innovation within government agencies by promoting creative problem-solving, adopting agile methodologies, and leveraging technology to automate routine tasks.
- Agricultural Collaboration and Connectivity.
 - Encourage local agriculture producers to engage with agribusiness suppliers at all levels in discussions about area connectivity shortcomings that may be impeding use of precision agricultural technologies and collaborate to experiment with pilot connectivity projects.

Performance Metrics:

- Percent of local government units engaged through the establishment of a Broadband Community Readiness Certification program.
- Measure improvements to emergency response time in communities leveraging broadband technology to enhance its Next Generation 911 system.

Strategy 3.4:

Leverage strategies and public-private partnerships to improve the digital economy within Nebraska to maximize broadband investment.

Activities:

- Align broadband funding in areas of the state where there is targeted investment that supports economic development, improved health outcomes, enterprise and opportunity zones, workforce development programs, and K-12 learning.
- Encourage industry-academia collaboration in research and development to foster innovative broadband technologies and solutions that can increase the efficiency and quality of broadband services.
- Improve digital literacy throughout the state to increase the demand for broadband services and make the state more attractive to investors and companies.
 - Connect entrepreneurs to internet service providers for collaboration.

Performance Metrics:

- Amount of funding invested to support Nebraska's digital economy.
- Number of companies who become established in Nebraska or relocate to Nebraska to take advantage of Nebraska's digital economy.

Goal 4: Develop robust collaboration across Nebraskan communities through strategic planning of broadband and digital equity to ensure that all unserved and underserved communities are connected.

Community resiliency is the ability to use available resources over the long-term to respond to needs. This can happen if there are systems in place to connect individuals and groups and allow them to coalesce to meet collective needs. Broadband is essential to enabling that interconnection. The Broadband Office will develop a model that encourages and empowers stakeholders to convene around shared goals and values to find solutions that will reduce the existence of the digital divide.

Strategy 4.1

Develop regular forums by which broadband policy and decision making can be promulgated and feedback for such policy and decision making can be provided.

Activities:

- Establish regular community and industry forums to collect feedback to inform grant making and report on the status of the Plan. Such forums include:

- Annual Broadband Summit for local government, agriculture, economic development, business, education, internet provider, and public safety leaders
- Monthly stakeholder meetings.
- Monthly webinars to be posted on the Broadband Office website
- Conduct annual assessments on the state of broadband, risks to the broadband industry, and updates on strategies that include communications, industry capabilities and recovery initiatives.
- Conduct yearly Broadband Office-led listening tour to solicit feedback from communities and industry stakeholders.
- Conduct high level capacity and technical training with locally and regionally identified local government, agriculture, economic development, healthcare, education, and public safety leaders.

Performance Metrics:

- Number of community and industry stakeholder meetings hosted.
- Hold Broadband Summit.
- Develop mechanisms to identify local and regional leaders who can work with the Broadband Office.
- Number of training opportunities created and held to develop capacity and technical training with locally and regionally identified local government, agriculture, economic development, healthcare, education, and public safety leaders.

Strategy 4.2

Utilize robust collaboration to create local engagement by proactively developing local leadership capacity so that transparent informed local policy making can assist in providing broadband access to all Nebraskans.

Activities:

- Empower local organizations to work with ISP providers to develop broadband plans.
- Develop a program for recognized Municipalities and Counties that are “Broadband Ready” to achieve the following in coordination with local organizations:
 - Identify a local champion to help them work with local governments, agriculture leaders, business leaders, educational leaders, economic development leaders and public safety leaders.
 - Form local teams to engage the local and regional entities that influence broadband deployment decisions, including regulatory agencies, business leaders with broadband needs, and educational institutions.
 - Develop local capacity and technical needs assessments.

Performance Metrics:

- Number of training opportunities offered.
- Number of “local champions” engaged.

Goal 5: Ensure the long-term sustainability of deployed infrastructure necessary to preserve access by all Nebraskans to affordable and reliable communications services provided by broadband capable networks.

Spurred on by the attention during the COVID pandemic regarding the need for broadband infrastructure to provide universal access to broadband services for remote access to work and education, state and federal governments have made an unprecedented investment in capital construction costs for deployment of such infrastructure. Starting with the America Rescue Plan Act, and continuing with the Infrastructure and Jobs Act, and U.S. Department of Treasury Capital Projects Funds, significant federal support has been dedicated to this endeavor. The State of Nebraska has also dedicated state General Funds towards capital construction of broadband networks in recent years. With this investment in new and upgraded networks as well as the continuation of existing networks, it is reasonable to expect unprecedented costs for operating, maintaining, and upgrading these networks.²

Strategy 5.1

Encourage Federal and Nebraska policymakers to modernize the FUSF and NUSF.

Activities:

- Encourage the Commission to continue to reassess the utility of the NUSF program
- Encourage for the Commission to address issues related to the stability and efficacy of the NUSF.
- Monitor broadband buildout to assess the impact on the level of NUSF contributions.
- Examine how information/broadband services align with the goals and policies of the NUSF.

Performance Metrics:

- The Commission's continued use of the NUSF program to bolster its universal service goal
- Successful alignment of information/broadband services with the goals and policies of the NUSF

Strategy 5.2

Determine alignment of FUSF support programs (i.e., A-CAM and "Legacy" programs) with Nebraska broadband policies, including NUSF.

² 47 U.S.C. § 254(e) provides that FUSF shall be used "only for the provision, maintenance and upgrading of facilities and services for which the support is intended." Neb. Rev. Stat. § 86-317 states that the purpose of the Nebraska Telecommunications Universal Service Fund Act "is to authorize the commission to establish a funding mechanism which supplements federal universal service support mechanisms." Consistent with federal requirements, Neb. Rev. Stat. § 86-324(1) specifies that NUSF support shall be used "only for the provision, maintenance and upgrading of facilities and services for which the support is intended." Neb. Rev. Stat. § 86-323 states the overall purpose of the NUSF, authorizes the Nebraska Public Service Commission (Commission) to administer the program, and further states that it is the policy of the State that the "distribution of universal service funds should encourage the continued development and maintenance of telecommunications infrastructure."

Activities:

- Determine where shortfalls exist in the provision of support for ongoing expenses, maintenance, and upgrading costs for the network, utilizing updated cost model data.

Performance Metrics:

- If any shortfalls are discovered, timely support is provided to address them.

Strategy 5.3

Ensure that long-term commitments are satisfied under state administered broadband deployment grant programs other than FUSF and NUSF programs.

Activities:

- Ensure any state-administered broadband deployment grant programs include service commitment periods (NBBP requires 15 years).
- Assess technical, financial, and managerial capabilities of state-administered broadband grant program applicants to manage a network long-term.
- Establish/enhance/retain accountability standards for state-administered broadband deployment grant programs.
 - Accountability for support received
 - Accountability for meeting deployment obligations
- Establish/enhance enforcement protocols.
 - Mechanisms for enforcement in the event deployment obligations are not met
 - Mechanisms for enforcement in the event support is not used for its intended purpose

Performance Metrics:

- State-administered broadband deployment grant programs include service commitment periods
- Accountability measures are developed and enhanced for state-administered broadband deployment grant programs

Performance and Evaluation Recommendations

Benchmarking the success of the Nebraska Strategic Broadband Plan is important to assess what is working or needs improvement. Included are various metrics associated with each goal. The list below includes existing and new metrics for consideration. The next step of the Plan will be to coordinate stakeholders to finalize the metrics (outcome and lead measures).

Goal One

- Increase in broadband access (minimum 100/20) for rural households from 86.7% to 100% of households served.
- Number of households served with minimum speed standard of reliable 100 Mbps symmetrical upload and download (unless geographically, topography, or excessive cost then 100/20 and scalable to 100/20).
- Number of homes on tribal lands being connected to broadband speeds of 100/20 mbps.
- Number of speed tests confirmed.
- Percent increase in confirmed reported service speeds.
- Number of unserved and underserved connected to high-speed internet.

Goal Two

- Number of residents participating in the statewide Digital Equity Plan.
- Number of digital literacy programs, navigators, and partnerships.

Goal Three

- Number of individuals who have successfully participated in an industry focused workforce development program.
- Number of job placements in industry focused positions.
- Percent of local government units engaged
- Number of Broadband service providers that receive upgraded broadband equipment.
- Number of rural service providers that receive upgraded broadband equipment.

Goal Four

- Number of community and industry stakeholder meetings hosted.
- Number of CAIs connected to high-speed internet.

Goal Five

- The Commission's continued use of the NUSF program to bolster its universal service goal
- Successful alignment of information/broadband services with the goals and policies of the NUSF
- If any shortfalls are discovered, timely support is provided to address them.
- State-administered broadband deployment grant programs include service commitment periods
- Accountability measures are developed and enhanced for state-administered broadband deployment grant programs

Conclusion

The Nebraska Strategic Broadband Plan's goals and actions serve as a specific implementation plan for the Broadband Office. The plan includes short and long-term goals and actions that rely on funding. Therefore, the time frame for completion of goals and actions depends on available funding and is not included at this time. Implementation of the goals and actions will ensure that the state connects 100% of households to high-speed internet by 2027.

Annex B – BEAD Restructuring Policy Notice

DEPARTMENT OF COMMERCE

National Telecommunications and Information Administration

Broadband Equity, Access, and Deployment (BEAD) Program: BEAD Restructuring Policy Notice

ACTION: Notice

SUMMARY:

The Infrastructure Investment and Jobs Act (IIJA) provides funding for robust investment in American infrastructure projects. IIJA established the Broadband Equity, Access, and Deployment (BEAD) Program, which provides \$42.45 billion of funding to achieve high-speed broadband access throughout the United States. *See* Infrastructure Investment and Jobs Act of 2021, Division F, Title I, Section 60101, Public Law 117-58, 135 Stat. 429 (November 15, 2021) (codified at 47 U.S.C. § 1701 *et seq.*).

The National Telecommunications and Information Administration (NTIA), as the agency responsible for administering the BEAD Program, provides herein guidance for Eligible Entities (States, Territories, and the District of Columbia) to ensure American taxpayers obtain the greatest value for their broadband investment or “Benefit of the Bargain” under the BEAD Program.

This Policy Notice modifies and replaces certain requirements outlined in the BEAD Notice of Funding Opportunity (NOFO).¹ Each Eligible Entity must comply with this Policy Notice to gain approval of its Final Proposal from the Assistant Secretary of Commerce for Communications and Information.²

¹ NTIA, Notice of Funding Opportunity, Broadband Equity, Access, and Deployment Program (May 12, 2022), [NOFO.pdf \(doc.gov\)](#).

² This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements. In all cases, statutory and regulatory mandates shall prevail over any inconsistencies contained in this document.

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1. Background and Purpose

Congress allocated \$42.45 billion to the BEAD Program to connect every American to high-speed broadband Internet access. Instead of ensuring the swift and efficient use of these funds, the Biden Administration imposed significant non-statutory burdens and red tape that increased taxpayer costs, limited marketplace competition, and diverted resources away from actual deployment. As a result of these counterproductive Biden Administration burdens, the BEAD Program has failed to put a single shovel in the ground since IIJA's passage in 2021 —leaving many Americans unconnected. This Policy Notice rights these wrongs and institutes much needed reforms to the BEAD Program that will realign the Program with statutory intent, speed broadband deployment, and guarantee that American taxpayers receive the greatest “Benefit of the Bargain” for their historic investment.

These reforms are necessary. NTIA nevertheless recognizes that stakeholders have invested significant resources participating in the BEAD Program since IIJA passed in 2021. Accordingly, this Policy Notice carefully balances the work that has previously been done with necessary changes to ensure the success of the BEAD Program. Specifically, NTIA does not require Eligible Entities to repeat the initial stages of the Program but removes the extralegal Biden Administration burdens and promotes greater competition. This targeted approach will ensure that all Americans receive the greatest Benefit of the Bargain and that the BEAD Program moves forward expeditiously.

2. Elimination of Regulatory Burdens

Through this Policy Notice, NTIA eliminates burdensome and non-statutory requirements contained in the NOFO published on May 12, 2022. There is widespread agreement among states, lawmakers, and industry that the superfluous requirements imposed by the Biden Administration made the BEAD Program more complex and expensive, stifled competition, and led to reduced participation levels.³ This section of the Policy Notice identifies the NOFO provisions that are hereby terminated.⁴

³ Letter from Grant Spellmeyer, et al., to The Honorable Gina Raimondo, July 23, 2024, available [here](#); Letter from Senator Ted Cruz, to The Honorable Alan Davidson, Assistant Secretary of Commerce, August 13, 2024, available [here](#); Letter from Senator Ted Cruz, to The Honorable Alan Davidson, Assistant Secretary of Commerce, November 21, 2024, available [here](#); Letter from Senator John Thune, et al., to The Honorable Howard Lutnick, Secretary of Commerce, March 27, 2025, available [here](#); Letter from Senator John Thune, et al., to The Honorable Alan Davidson, Assistant Secretary of Commerce, April 20, 2023, available [here](#); Letter from Senator Susan Collins, et al., to The Honorable Gina M. Raimondo, Secretary of Commerce, August 18, 2022, available [here](#); Letter from Glenn Hegar, Texas Comptroller of Public Accounts, to Senator Ted Cruz, February 6, 2025, available [here](#); Jericho Casper, *ACA Connects Pushes for Less Regulation, Faster BEAD Deployment*, Broadband Breakfast, January 31, 2025, available [here](#).

⁴ NTIA has attempted to identify each individual section of the NOFO from which references to non-statutory requirements are eliminated. However, to the extent such identification is impossible or impractical within the foregoing guidance, NTIA will provide additional technical assistance further clarifying individual references to eliminated requirements.

As described below, Eligible Entities shall eliminate the following non-statutory requirements from BEAD application scoring, subgrantee agreements, and subgrantee reporting requirements. Eligible Entities are hereby prohibited from imposing any of the obligations removed by this Policy Notice on subgrantees as part of the BEAD Program. Where state law conflicts with the requirements of this Policy Notice, Eligible Entities may seek a waiver of that requirement from the Assistant Secretary.

1. Labor, Employment, and Workforce Development Requirements

NTIA hereby eliminates the non-statutory requirements in the NOFO related to labor, employment, and workforce development. These central planning and diversity, equity, and inclusion (DEI) edicts disadvantage both workers and providers, drive up costs, and undermine broadband buildout, especially in the rural communities the Program is intended to help.⁵ Specifically, NTIA hereby eliminates the following sections of the NOFO: “Fair Labor Practices and Highly Skilled Workforce”; “Advancing Equitable Workforce Development and Job Quality Objectives”; and “Civil Rights and Nondiscrimination Law Compliance.”⁶ The related Initial Proposal and Final Proposal requirements⁷ and the corresponding reporting requirements are also eliminated.⁸ The “Contracting with Small and Minority Businesses, Women’s Business Enterprises, and Labor Surplus Area Firms” section is also eliminated.⁹

Eligible Entities shall satisfy the statutory requirement to “give priority to projects based on . . . [a] demonstrated record of and plans to be in compliance with Federal labor and employment laws”¹⁰ by requiring a subgrant applicant to certify compliance with such laws to the Eligible Entity.¹¹

2. Climate Change Requirements

NTIA hereby eliminates the requirements in the NOFO related to climate change, which prioritized the prior Administration’s radical environmental social agenda at the expense of swift and efficient broadband deployment. Specifically, NTIA hereby eliminates the “Climate

⁵ Johnny Kamps, *“State and federal policies may stymie BEAD participation,”* The Center Square, May 19, 2021, available [here](#); Doug Dawson, *Another Red Flag – the BEAD Labor Requirements*, POTs and PANs (July 18, 2023), available [here](#).

⁶ NOFO, Section IV.C.1.e-g, pgs. 56-62.

⁷ NOFO, Section IV.B.5.b.11-13, pg. 32, and NOFO, Section IV.B.9.b.11.b-c, pg. 48.

⁸ NOFO, Section VII.E.2.9,12, pgs. 90-92.

⁹ NOFO, Section VII.D.7, pgs. 88-89.

¹⁰ 47 U.S.C. §1702(h)(1)(A)(iv)(IV).

¹¹ To the extent state laws impose additional labor and employment obligations, Eligible Entities must seek a waiver of this provision from NTIA, as necessary to comply with state law.

Resilience” section of the NOFO¹² and the related Initial Proposal and Final Proposal requirements.¹³

Subgrantees shall satisfy the statutory requirement to incorporate best practices defined by NTIA for ensuring reliability and resilience of broadband infrastructure¹⁴ by establishing risk management plans that account for technology infrastructure reliability and resilience, including from natural disasters (e.g., wildfires, flooding, tornadoes, hurricanes, etc.), as applicable, as well as cybersecurity best practices.¹⁵

3. Open Access/Net Neutrality

NTIA hereby eliminates the non-statutory requirements in the NOFO related to open access and net neutrality. Specifically, NTIA eliminates the “Consumer Protections” section of the NOFO¹⁶ that required Eligible Entities to “ensure that each prospective subgrantee does not impose data usage caps on any plans offered over a Funded Network or impose unjust or unreasonable network management practices.” NTIA further eliminates the “Interconnection Requirements and Wholesale Access” section of the NOFO.¹⁷

NTIA finds that these NOFO provisions were superfluous to the goals of the BEAD Program, discouraged provider participation, and, as a result, were ultimately counterproductive for Eligible Entities undertaking the complex and difficult mission of connecting all of their constituents to broadband. Although subgrantees must still satisfy the statutory requirement to “include interspersed conduit access points at regular and short intervals” for any project that involves laying fiber optic cables or conduit underground or along a roadway,¹⁸ NTIA eliminates the “Conduit Access Points” section of the NOFO to the extent it imposes additional obligations beyond those in the statute.¹⁹

4. Local Coordination and Stakeholder Engagement

NTIA hereby eliminates the non-statutory requirements in the NOFO related to local coordination and stakeholder engagement, including burdensome obligations to consult with representatives of various demographic and identity-based interest groups. These provisions only served to delay plan submissions and contribute to the current lack of broadband deployment in

¹² NOFO, Section IV.C.1.h, pgs. 62-64.

¹³ NOFO, Section IV.B.5.b.15, pg. 32, and NOFO, Section IV.B.9.b.11.e, pg. 48.

¹⁴ 47 U.S.C. §1702(g)(1)(C).

¹⁵ See, e.g., National Institute of Standards and Technology Framework for Improving Critical Infrastructure Cybersecurity, *Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations*, NIST 800-161 Rev.1 and *Key Practices in Cyber Supply Chain Risk Management: Observations from Industry*, NIST IR 8276.

¹⁶ NOFO, Sec. IV.C.2.c.ii, pg. 68.

¹⁷ NOFO, Sec. IV.C.2.c.v, pg. 69.

¹⁸ 47 U.S.C. §1702(h)(4)(D).

¹⁹ NOFO, Sec. IV.C.2.b.ii, pg. 66.

the BEAD Program. Specifically, NTIA eliminates the “Local Coordination” and “Public Notice” sections of the NOFO²⁰ and the related Initial Proposal and Final Proposal content requirements²¹ that dramatically expand on the statutory local coordination requirements.

IJA statutorily requires Eligible Entities to adopt local coordination requirements established by NTIA. NTIA concludes that an Eligible Entity shall satisfy this requirement by certifying that it observed the Final Proposal public comment requirements and received plans submitted by political subdivisions up until submission of the Final Proposal to NTIA.

5. Non-Traditional Broadband Providers

NTIA hereby eliminates requirements in the NOFO that favored non-traditional broadband providers (such as municipalities or political subdivisions) by forcing Eligible Entities to justify awards to traditional providers when a competing proposal from a non-traditional provider was submitted. This illogical requirement introduced a bias that risked redirecting scarce funds to less capable providers.²² Specifically, NTIA eliminates the “Consider All Provider Types” section of the NOFO²³ and the related Initial Proposal and Final Proposal requirements.²⁴

Eligible Entities must still adhere to the statutory requirement regarding the non-exclusion of various entities from eligibility for BEAD subgrants.²⁵

6. Middle Class Affordability Plan

NTIA hereby eliminates the NOFO requirement for Eligible Entities to develop, implement, and provide updates on a middle-class affordability plan.²⁶ NTIA finds that this non-statutory provision was confusing, arbitrary, impossible to operationalize, and deterred provider participation in the program.

7. Low-Cost Service Option

NTIA hereby eliminates the non-statutory requirements in the NOFO related to the BEAD low-cost broadband service option (LCSO). Specifically, NTIA hereby eliminates the “Affordability

²⁰ Section IV.C.1.c, pgs. 51-56, and NOFO Section IV.C.2.c.iv, pgs. 68-69.

²¹ NOFO, Section IV.B.5.b.4, pg. 31, and NOFO, Section IV.B.9.b.5, pg. 47.

²² Andrew Long, *New Study Once Again Dispels Municipal Broadband Viability: And Affirms the Wisdom of State Bans*, Free State Foundation, August 18, 2021, available [here](#) (noting “that most municipal broadband projects can’t even cover their costs.”)

²³ BEAD Section IV.C.1.a, pg. 50-51.

²⁴ NOFO, Section IV.B.5.b.18, pg. 32, and NOFO, Section IV.B.9.b.10, pg. 48.

²⁵ 47 USC §1702(h)(1)(A)(iii).

²⁶ This notice eliminates the NOFO section titled Affordability and Low-Cost Plans, which includes the requirements for a middle-class affordability plan.

and Low-Cost Plans” section of the NOFO.²⁷ and the related Initial Proposal and Final Proposal requirements to the extent they are inconsistent with this Policy Notice.²⁸

IJA requires BEAD subgrantees to “offer not less than 1 low-cost broadband service option for eligible subscribers.”²⁹ IJA also clearly prohibits NTIA from regulating the rates charged for broadband service.³⁰ NTIA finds that by offering a “model” low-cost service option with specific dollar amounts and requiring Eligible Entities to set a specific rate in order to be approved by NTIA, the Biden Administration engaged in improper rate regulation in the NOFO. Moreover, some Eligible Entities imposed unreasonable rates consistent with the parameters outlined in the NOFO. NTIA finds that this raised the cost of participating in BEAD and prevented some providers from pursuing BEAD subgrants entirely.³¹

BEAD subgrantees must still comply with the statutory provision to offer at least one LCSO,³² but NTIA hereby prohibits Eligible Entities from explicitly or implicitly setting the LCSO rate a subgrantee must offer. To be clear, NTIA will only approve Final Proposals that include LCSOs proposed by the subgrantees themselves. Finally, NTIA also hereby modifies the eligible subscriber definition (below) to align it with the Federal Communications Commission’s (FCC) Lifeline Program and other Federal assistance programs.

a. LCSO Service Requirements

Consistent with IJA, Eligible Entities shall require potential BEAD subgrantees to propose an LCSO as part of their applications that meets certain speed and performance criteria. As required by IJA and the NOFO, the LCSO must offer speeds of at least 100/20 Mbps and latency performance of no more than 100 milliseconds. Applicants that already offer a low-cost plan that meets these service requirements may satisfy the LCSO requirement by proposing to offer their existing low-cost plan to eligible subscribers.

b. Eligible Subscriber Definition

IJA directs NTIA to define “eligible subscriber” for the BEAD low-cost broadband service option. The NOFO adopted the eligibility requirements of the FCC’s Affordable Connectivity Plan which is no longer operational. Accordingly, NTIA hereby redefines “eligible subscriber” to match the eligibility criteria for the FCC’s Lifeline Program. This eligibility change aligns the BEAD LCSO requirement with an existing communications

²⁷ NOFO, Section IV.C.2.c.i, pg. 66-68.

²⁸ NOFO, Section IV.B.5.b.16, pg. 32, and NOFO, Section IV.B.9.b.11.d, pg.48.

²⁹ 47 U.S.C. §1702(h)(4)(B).

³⁰ *Id.* at §1702(h)(5)(D). “Nothing in this subchapter may be construed to authorize the Assistant Secretary or [NTIA] to regulate the rates charged for broadband service.”

³¹ Ana Radelat, *Internet for All Plans in Minnesota in Trouble as Broadband Providers Balk at Onerous Regulations*, MINNPOST (June 24, 2024), available [here](#).

³² Subgrantees must also still comply with the statutory and NOFO requirements pertaining to service level.

affordability program as well as other Federal benefit qualifications for low-income Americans. The definition of an Eligible Subscriber for the LCSO stated in the NOFO is hereby stricken and is replaced with the following:

Eligible Subscriber—The term “Eligible Subscriber” means any household seeking to subscribe to broadband internet access service that is eligible for the FCC’s Lifeline Program.³³

BEAD subgrantees are responsible for verifying LCSO eligibility and may ask potential subscribers to provide the same documentation necessary to confirm eligibility as is required under the Lifeline program.

3. Technology Neutrality

To guarantee that American taxpayers obtain the greatest return on their broadband investment – the Benefit of the Bargain – NTIA finds that the full force of the competitive marketplace must be utilized. Therefore, all broadband technologies that meet the performance requirements of IIA and the NOFO must be eligible to participate in the BEAD Program. Accordingly, NTIA rejects the Biden Administration’s imposition of technology preferences on Eligible Entities and instead adopts a technology neutral approach for the BEAD subgrantee selection process.

The NOFO limited priority broadband projects to those using end-to-end fiber. In doing so, the NOFO relegated other capable technologies, including terrestrial wireless and low Earth orbit (LEO) satellite services, to a third-tier status, limiting the ability of these technologies to fully participate in the NOFO subgrantee selection process and denying the taxpayer the Benefit of the Bargain via increased competition. None of these technology limitations are in statute, and they undermine the ability of Eligible Entities to select not only the most cost-effective technologies, but also those that are much quicker to deploy, and which may be better suited to a given Eligible Entity’s particular circumstances. Accordingly, NTIA hereby eliminates the “Fiber Preference” section of the NOFO³⁴ and permits Eligible Entities to select from all qualifying technologies.

3.1 Priority Broadband Projects

IIA requires Eligible Entities to prioritize funding for “priority broadband projects.” The statute defines a priority broadband project as one designed to:

- (i) provide broadband service that meets speed, latency, reliability, consistency in quality of service, and related criteria as the Assistant Secretary shall determine;³⁵ and
- (ii) ensure that the network built by the project can easily scale speeds over time to –

³³ Lifeline eligibility criteria are defined in 47 CFR §54.409.

³⁴ NOFO, Section IV.B.7.b.2.i-ii.

³⁵ NTIA previously determined that broadband services must meet the statutory minimum speeds of 100/20 Mbps and latency less than or equal to 100 milliseconds (consistent with the FCC).

- a. meet the evolving connectivity needs of households and businesses; and
- b. support the deployment of 5G, successor wireless technologies, and other advanced services.³⁶

The NOFO, however, limited this definition to one technology: end-to-end fiber.³⁷ The definition of a Priority Broadband Project as stated in the NOFO is hereby stricken and is replaced with the following:

Priority Broadband Project—The term “Priority Broadband Project” means a project that provides broadband service at speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads, has a latency less than or equal to 100 milliseconds, and can easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services.

Any applicant may seek to have the Eligible Entity treat its application as a Priority Broadband Project regardless of the technology used. The applicant’s project, however, must still meet the required speed and latency standards set forth in the statute and the NOFO and demonstrate that it meets the additional statutory criteria, including that the project can easily scale speeds over time to support evolving connectivity needs and the deployment of 5G and successor wireless technologies. Applicants must provide supporting documentation sufficient for the Eligible Entity to assess the network application and determine that the proposed network architecture for each specific project area meets this standard.

Eligible Entities may not categorically exclude any given technology and may only reject treatment of an application as a Priority Broadband Project if the project could not meet the statutory definition for a specific project area. As discussed in Section 3.4 below, NTIA reserves the right to reverse an Eligible Entity’s determination that a project does or does not meet the standard for a Priority Broadband Project if such determination is unreasonable.

As required by IIJA, Eligible Entities shall give priority to proposals that meet the definition of a Priority Broadband Project. If an Eligible Entity determines that no proposal meets the definition of a Priority Broadband Project, then it may select a non-priority broadband project that meets the speed and latency requirements of the statute and NOFO.³⁸ Eligible Entities are no longer required to establish an Extremely High Cost Per Location Threshold, but an Eligible Entity shall reject a Priority Broadband Project if the cost of the project is excessive. The NOFO’s additional distinctions between fiber, other reliable broadband services, and alternative technologies are hereby eliminated.

³⁶ 47 U.S.C. §1702(a)(2)(I).

³⁷ NOFO, Section I.C(r), pg. 14.

³⁸ In other words, a “non-priority” proposal would offer service at or above 100/20 Mbps and latency less than or equal to 100 milliseconds, but could not necessarily meet the statutory scalability requirements in 47 U.S.C. §1702(a)(2)(I)(ii).

Scoring for both Priority Broadband Projects and non-Priority Broadband Projects will be conducted pursuant to the scoring rubric outlined below.

3.2 Technologies Eligible for Participation

The United States is topographically diverse and the most effective broadband technology for one part of the country may not be the best fit for another. Therefore, NTIA eliminates the NOFO's rigid three-tier structure for prioritizing technology. Fiber-optic technology, cable modem/hybrid fiber-coaxial technology, LEO satellite services, and terrestrial fixed wireless technology utilizing entirely licensed spectrum, entirely unlicensed spectrum, or a hybrid of licensed and unlicensed spectrum, may be used in applications for Priority Broadband Projects so long as the technologies employed in the project proposal meet the technical performance requirements in the NOFO, as redefined by this Policy Notice, and the statute.³⁹

3.3 The Benefit of the Bargain Round (Subgrantee Selection)

It is critical that the subgrantee selection process reflect the technology neutral approach Congress outlined in IIJA and this Policy Notice implements. At the same time, NTIA recognizes that given the Biden Administration's misdirection, some Eligible Entities have completed or are in the process of completing their subgrantee selection. As such, NTIA is requiring Eligible Entities to conduct at least one additional subgrantee selection round for every BEAD-eligible location (the "Benefit of the Bargain Round"). The Benefit of the Bargain Round must permit all applicants – regardless of technology employed or prior participation in the program – to compete on a level playing field undistorted by the non-statutory regulatory burdens eliminated above. All subgrantee selection conducted after the release of this Policy Notice must comply with the terms of this Policy Notice.

Eligible Entities must rescind all preliminary and provisional subaward selections and notify applicants that a further round of applications will be considered before final awards are made. Eligible Entities that have already completed subgrantee selection must conduct at least one Benefit of the Bargain round. Eligible Entities have 90 days to comply with the obligations outlined within this Policy Notice and submit a Final Proposal that reflects the results of the Benefit of the Bargain round. This deadline replaces the deadline extensions previously granted in the Programmatic Waiver of the Final Proposal Deadline Requirements.⁴⁰ NTIA will complete its review of each Final Proposal within 90 days of submission.

To the extent an Eligible Entity has a prequalification process, it must be reopened to all interested applicants, although the Eligible Entity may make prequalification submissions part of the application package. Existing qualified applicants do not need to resubmit prequalification documentation. If an applicant previously failed the prequalification process, it may choose to update its materials and seek prequalification again. Eligible Entities, however, must still ensure

³⁹ Appendix A contains further guidance regarding the technical performance requirements unlicensed fixed wireless (ULFW) services must meet to be eligible for BEAD subgrants.

⁴⁰ See BEAD Programmatic Waiver of the Final Proposal Deadline Requirements (Apr. 22, 2025), available [here](#).

that applicants meet the financial and managerial capacity, technical and operational capability, and other requirements in 47 U.S.C. § 1702(g)(2)(A).

Where an applicant elects to stand on an existing subgrantee application received prior to the publication of this Policy Notice, that application shall be rescored under the rubric detailed below and may be awarded during the Benefit of the Bargain round, but no BEAD subgrantee will be permitted to recover costs to comply with the regulatory burdens eliminated in this Policy Notice. Existing applicants may also choose to submit a new application that eliminates the cost of these regulatory burdens in anticipation of competition from additional applicants. Eligible Entities must exclude all non-statutory regulatory burdens as identified above from the application and scoring processes for subgrantee selection. Eligible Entities must also allow applicants to propose to exclude select broadband serviceable locations (BSLs) that the applicant determines are excessively high-cost locations from the project area (or would otherwise make the project economically unviable for the technology being used).⁴¹

As required by IIJA, all subgrantees must deploy the planned broadband network, regardless of the technology utilized, and be able to perform a standard installation for each customer that desires broadband services within the project area not later than four years after the date on which the subgrantee receives the subgrant from the Eligible Entity.⁴² For purposes of this requirement, a standard installation is the initiation by a provider of fixed broadband internet access service within 10 business days of a request with no charges or delays attributable to the extension of the network of the provider. BEAD subgrantees may charge standard installation fees to subscribers on the BEAD-funded network but may not require subscribers to make modifications to their own or surrounding property or charge fees for the same in connection with installation of broadband services funded by the BEAD Program.

3.4 Scoring Rubrics

The goal of restructuring the BEAD Program is to ensure that the American taxpayers receive the greatest benefit from their investment in broadband infrastructure while also providing Eligible Entities with the flexibility to meet the needs of their unique circumstances. Instead of establishing straightforward selection criteria focused on the efficient deployment of broadband, the Biden Administration's guidelines to Eligible Entities were scattered and preoccupied with extraneous social policy goals. Thus, NTIA hereby revises the scoring criteria previously outlined in the NOFO to focus on minimizing the cost of deployment under the BEAD Program.

As Eligible Entities conduct further rounds of subgrantee selection to comply with this Notice, they must prioritize Priority Broadband Projects over non-Priority Broadband Projects. If an Eligible Entity determines that selecting a Priority Broadband Project would incur excessive costs, it shall select a lower cost non-Priority Broadband Project.

NTIA declines to adopt a national cost threshold over which a project would be deemed excessive. However, NTIA hereby reserves the right to reject any proposed deployment project

⁴¹ Eligible Entities must solicit bids from other potential applicants for any such eliminated BSL, or applicant may propose a multi-provider solution.

⁴² 47 U.S.C. §1702(h)(4)(C).

or specific BSL connection for which costs to deploy are excessive, as determined by NTIA based on the cost characteristics of the area to be served. The Biden Administration pursued an extreme technology bias and instructed Eligible Entities to set their Extremely High Cost Per Location Threshold “as high as possible.”⁴³ This guidance led to excessive project area costs: Nevada’s Extremely High Cost Per Location Threshold set at \$200,000, for example, resulted in a Final Proposal that included 24 project areas with a per-BSL cost of \$100,000 or more. This is an unjust and unfair expenditure of taxpayer dollars that this Administration simply will not let stand. Eligible Entities are strongly encouraged to exercise judicious cost oversight to avoid delay or denial in Final Proposal processing.

To ensure that taxpayer dollars are protected, NTIA reserves the right to reject an Eligible Entity’s selection of a project for a subgrant if such project would impose unreasonable costs on the BEAD Program. As discussed in Section 3.1 above, NTIA also reserves the right to overturn an Eligible Entity’s determination whether a project meets the definition of a Priority Broadband Project.

Eligible Entities shall score competing applications using the following criteria:

Primary Criteria. In deciding among competing applications covering the same general project areas, Eligible Entities must choose the option with the lowest cost based on minimal BEAD Program outlay.

Minimal BEAD Program Outlay. The Eligible Entity must select the combination of project proposals with the lowest overall cost to the Program. This may involve selecting a proposal that is not the lowest-cost option for a given set of BSLs but is part of the combination of selected projects with the lowest overall cost to the Program.

When comparing competing proposals, Eligible Entities shall assess the total BEAD funding that will be required to complete the project (i.e., the total project cost minus the applicant’s proposed match) and the cost to the Program per location (i.e., the total BEAD funding that will be required to complete the project divided by the number of BSLs the project will serve).

Secondary Criteria. If an application to serve the same general project area proposes a project cost within 15% of the lowest-cost proposal received for that same general project area on a per BSL basis, the Eligible Entity must evaluate such competing applications based on the following three criteria. The relative weighting of these three criteria shall be at the discretion of the Eligible Entity:

Speed to Deployment. The prospective subgrantee’s binding commitment to provision service by a date certain that is earlier than four years after the date on which the subgrantee will receive the subgrant from the Eligible Entity subject to contractual penalties to the Eligible Entity. Greater consideration can be awarded to prospective subgrantees promising an earlier service provision date.

⁴³ NOFO, Section I.C.(k), ft. nt. 6, pg. 13.

Speed of Network and Other Technical Capabilities. Eligible Entities may weigh the speed, latency, and other technical capabilities of the technologies proposed by prospective subgrantees.

Preliminary/Provisional Subgrantees. For locations where Eligible Entities have already identified preliminary or provisionally selected subgrantees, Eligible Entities may give additional weight to those applications in the Benefit of the Bargain Round.

As required by IJA, Eligible Entities must still ensure that subgrantees have a demonstrated record of, and plans to continue compliance with, Federal labor and employment laws. A subgrantee will satisfy this requirement through self-certification of compliance with Federal labor and employment laws. Fair labor practices shall no longer be considered within the scoring criteria. Likewise, the other secondary criteria identified in the NOFO (affordability, equitable workforce development and job quality, open access, local and tribal coordination), as well as any additional scoring criteria imposed by the Eligible Entity, shall no longer be considered as award selection criteria.

4. Optimizing BEAD Locations

Given the significant work and time already expended and to ensure the BEAD Program begins connecting Americans as soon as possible, Eligible Entities are not required to re-run their challenge process. NTIA-approved lists of BEAD eligible locations will only be altered in accordance with this section. To ensure that the lists of BEAD eligible locations are accurate and to prevent overbuilding of privately funded networks and Federal, state, or locally funded locations by BEAD, Eligible Entities must implement the following measures:

- Eligible Entities must investigate and account for locations that do not require BEAD funding using the reason code process as detailed in the Final Proposal Guidance.⁴⁴
- Eligible Entities must modify BEAD-eligible location lists to include locations no longer served due to a default or change in service area on a Federal enforceable commitment where the Federal entity has notified NTIA and the Eligible Entity of the default by the release of this Policy Notice. To facilitate the process, NTIA will send each Eligible Entity, if applicable, a list of defaulted or newly eligible locations that qualify for BEAD within fourteen (14) calendar days of the issuance of this Policy Notice. Eligible Entities must: (1) determine that these locations are not served by some other means (e.g., state enforceable commitment); (2) certify that the locations are unserved or underserved; and

⁴⁴ Specifically, Eligible Entities must remove locations that have been removed from the latest version of the FCC Fabric (reason code 3), locations already served by an enforceable commitment (reason code 4), and locations already served by non-subsidized service (reason code 5) wherever possible and account for them in the Final Proposal. NTIA will validate that these reason codes have been exercised when reviewing Final Proposals. Furthermore, Eligible Entities must certify in the Final Proposal that none of the BEAD funded BSLs should be classified under reason code 1 (should not have a broadband connection) or reason code 2 (do not need mass-market broadband service due to the nature of use). Eligible Entities must utilize reason codes 1, 2, and 3 for the entire period of performance, in accordance with the Final Proposal Guidance.

(3) incorporate these locations into their BEAD location list prior to accepting applications in subgrantee selection. Eligible Entities with a need to incorporate these locations must update their post challenge locations list to reflect the new BEAD eligible locations (i.e., updated BSL classifications) in their submission to NTIA detailing implementation of the Policy Notice, as detailed in Section 8 below.

- Because unlicensed fixed wireless providers (ULFW) providers are now permitted to compete for BEAD subgrants on a level playing field with all other applications, Eligible Entities must account for BSLs with access to existing ULFW networks to prevent overbuilding. Thus, Eligible Entities must take the following steps to ensure that locations already served by an ULFW service that meets the technical specifications within Appendix A of this Policy Notice are not included in awards for BEAD deployment projects. Before implementing the Benefit of the Bargain round, Eligible Entities must review the FCC’s National Broadband Map to determine whether such an ULFW provider (technology code 70) currently offers service to any BEAD-eligible BSLs in its jurisdiction. If so, the Eligible Entity must notify the ULFW provider (public posting is sufficient notice) that it has seven calendar days to respond that the ULFW provider intends to submit evidence that BEAD funding is not required for the locations it serves.

Upon receiving the response, the Eligible Entity shall allow the provider seven (7) calendar days to submit documentation supporting the claim that the existing ULFW services meet the same technical and service standards required for a ULFW application for a BEAD subgrant (see Appendix A of this Notice) and the provider is reasonably capable of delivering the service for at least four years after the date of Final Proposal submission.⁴⁵ If a ULFW service provider demonstrates that it meets the requirements specified by this Policy Notice, the served locations will be ineligible for BEAD Program funding. If the provider does not respond or fails to meet the requirements specified by this Policy Notice herein, the locations in question will remain BEAD eligible.

- Eligible Entities must revise their list of eligible Community Anchor Institutions (CAIs) to ensure their designations conform with the statutory definition of a CAI as established by IIJA.⁴⁶ NTIA hereby revokes the more expansive definition adopted by the NOFO.⁴⁷ NTIA will closely review all CAI submissions and will narrowly interpret the term “community support organization” as used in the statute. NTIA reserves the right to reject any CAI designation.

⁴⁵ The Eligible Entity may request additional evidence from the ULFW service provider and receive information from other sources.

⁴⁶ 47 U.S.C. §1702(a)(2)(E).

⁴⁷ NOFO, Section I.C.(f), pgs. 11-12.

5. Non-Deployment Funding

Funding for allowable non-deployment purposes is under review and NTIA will issue updated guidance in the future. As of the date of this Policy Notice, NTIA rescinds approval of all non-deployment activities approved in Initial Proposals. NTIA will not reimburse Eligible Entities for any new costs associated with previously approved non-deployment activities incurred after the date of this Policy Notice. An Eligible Entity should consult with the NIST Grants Office and NTIA if the Eligible Entity believes that it is entitled to reimbursement for non-deployment activities or costs that were incurred prior to the publication of this Policy Notice. Final Proposals will only require detail on the use of BEAD funds for deployment projects.

6. Permitting

To support NTIA's goal of issuing National Environmental Policy Act (NEPA) approvals within two weeks for an estimated 90 percent of BEAD projects and eliminate approximately 3-6 months of environmental processing per project, all Eligible Entities are hereby required to use the Environmental Screening and Permitting Tracking Tool (ESAPTT) within the NTIA Grants Portal. ESAPTT will help Eligible Entities serve as joint lead agencies for NEPA reviews by identifying applicable categorical exclusions and enabling paperless transmission of environmental documents and generation of draft and final NEPA documents. NTIA will generate ESAPTT project records from BEAD subgrant award data, which must identify any awards containing multiple NEPA project areas. Eligible Entities are further encouraged to use ESAPTT's permitting tracking capacity to evaluate and track subrecipient NEPA milestone schedules and escalate Federal right-of-way permitting issues to NTIA for interagency resolution.

7. Alignment with Prior Guidance

The following Policy Notices addressing "Alternative Technologies" and BEAD subgrantee selection are now obsolete and are hereby rescinded:

- Broadband Equity, Access, and Deployment (BEAD) Program: Selecting the Most Robust, Affordable, Scalable Technology, released June 26, 2024; and
- Broadband Equity, Access, and Deployment (BEAD) Program: Alternative Broadband Technology Policy Notice, released December 12, 2024.

Certain portions of those Policy Notices addressed unique issues related to ULFW and LEO projects. These ULFW and LEO issues are now addressed in this Policy Notice as follows: (1) Deduplication of unlicensed fixed wireless services is addressed in Section 4 above, and (2) Procedures for LEO capacity subgrants are addressed in Appendix B.

8. Modification of Initial and Final Proposals

As of the date of this Policy Notice, any new costs incurred by an Eligible Entity to implement its Initial Proposal must comply with the terms of the Notice. Any costs incurred by an Eligible Entity after this Notice is published that do not comply with the terms of this Notice may be disallowed.

Further, NTIA hereby rescinds all Final Proposal approvals that occurred prior to the publication of this Notice, as those Final Proposals no longer effectuate the goals of the Program or the agency priorities that are detailed in this Notice.⁴⁸ Any Eligible Entity affected by this change must follow the same process as all other Eligible Entities, described in the next paragraph, to incorporate the terms of this Notice into its Initial Proposal.

To comply with this Policy Notice, the Authorized Organization Representative for each Eligible Entity must submit a letter to NTIA within 30 calendar days requesting an Initial Proposal correction to incorporate the terms of the Policy Notice into its Initial Proposal. A template of this letter is included in Appendix D below. No other modifications to Initial Proposals will be considered at this time. The submission must include the list of newly added locations described in Section 4 above, if applicable. An Eligible Entity may also submit an Initial Proposal Funding Request budget modification in addition to this letter, should it need access to additional BEAD funds or need to reallocate BEAD funding across cost categories to execute the actions required by this Policy Notice. An Eligible Entity may execute its modified subgrantee selection process once NTIA approves the Initial Proposal correction. Budget modifications will require both NTIA and NIST approval.

⁴⁸ NTIA executes these actions based on the authority in 2 CFR §200.340(a)(2), which is incorporated into each BEAD award.

Appendix A: Unlicensed Fixed Wireless Service Requirements

NTIA finds that concerns regarding the reliability of ULFW services could have been easily mitigated by implementing specialized technical requirements rather than by prohibiting their inclusion entirely in the BEAD Program. To ensure technology neutrality, increase competition, and drive down costs for taxpayers, NTIA determines that ULFW technology should be permitted to participate in the BEAD application process so long as it meets the technical criteria specified herein. Providers utilizing ULFW services must demonstrate that they have taken the steps necessary to resolve potential interference and capacity constraints associated with such technology. Specifically, ULFW applicants must demonstrate they have addressed the problems of interference from other Part 15 users⁴⁹ competing for the same spectrum and the difficulty of evaluating ULFW network capability. ULFW providers may adopt the following mitigation strategies to meet this burden.

Eligible Entities shall determine whether ULFW providers have presented sufficient evidence to address these concerns and are therefore qualified to apply for BEAD funds. This determination is separate from deciding whether a project application employing ULFW is a priority broadband project.

The following are examples of mitigation strategies that unlicensed fixed wireless providers may adopt to address the technical issues associated with ULFW deployments:

Mitigating Potential Interference:

- Beam forming and/or beam nulling antenna arrays at both base station and subscriber radios
- Interference mitigation (in addition to beam forming/nulling) technologies
- Advanced non-line-of-sight capabilities or design considerations
- Reserved base station capacity to account for periods of higher interference
- Conservative link budgets to account for potential interference/congestion losses
- Adherence with network equipment manufacturer best practices or guidance regarding items such as minimum signal strength necessary to meet speed and latency requirements

Evaluating Network Capability:

- To ensure that the ULFW provider will have sufficient capacity to meet the statutory speed requirement of 100 Mbps download and 20 Mbps upload, the network design for ULFW projects must demonstrate the ability to provide at least 5 Mbps (100Mbps downstream service - to be scaled for higher speed commitments) of simultaneous capacity to each BSL in the project area
- Reserved base station capacity to account for periods of higher interference
- Adherence with network equipment manufacturer best practices or guidance regarding items such as:
 - Capacity/loading of base station radios with respect to number of, and provisioned bandwidth of, subscribers

⁴⁹ 47 CFR Part 15 (Radio Frequency Devices).

- Minimum signal strength necessary to meet speed and latency requirements
- Backhaul requirements for base station deployments

Appendix B: Low Earth Orbit Capacity Subgrants

As noted in Section 7 above, the legal and regulatory framework for Federal grants that has historically applied to broadband deployment funding programs does not capture the differences between LEO deployments and other broadband technologies. For example, when funding traditional broadband service, the Federal government typically takes an interest in the physical plant to ensure performance. With LEO service, however, there is no defined network dedicated to fixed locations in which the Federal government could take an interest to ensure performance.

To address this issue, NTIA requires that Eligible Entities awarding BEAD subgrants to LEO providers employ “LEO Capacity Subgrants.” Pursuant to a LEO Capacity Subgrant, an Eligible Entity shall reserve sufficient capacity from the LEO provider to deliver broadband service that meets the BEAD performance and technical requirements to each BSL in the project area and shall include the conditions set forth below.⁵⁰

Conditions of LEO Capacity Subgrants

First, as required by 47 U.S.C. § 1702(h)(4)(C), like all other subgrantees, recipients of LEO Capacity Subgrants must begin providing broadband service to each customer that desires broadband service not later than four years from the date of the subgrant.⁵¹ A recipient of a LEO Capacity Subgrant shall be deemed to have begun to provide service when it certifies to the Eligible Entity that the recipient can initiate broadband service within ten (10) business days of a request to any covered BSL in the project area, with no charges or delays attributable to extension of the service.⁵²

Second, Eligible Entities shall require a period of performance⁵³ for LEO Capacity Subgrants that concludes ten years from the date upon which the subgrantee certifies to the Eligible Entity that broadband is available to every location covered by the project.⁵⁴ Recipients of LEO Capacity Subgrants must continue to offer access to broadband service to each BSL served by the project throughout the period of performance.⁵⁵ In other words, if a customer receiving

⁵⁰ These conditions apply even if only a portion of the BEAD funds under the subgrant goes to reimburse a subgrantee for the reservation of capacity on LEO network to deliver last-mile broadband service.

⁵¹ 47 U.S.C. §1702(h)(4)(C); *see also* NOFO, Section IV.C.2.b.i, pg. 65.

⁵² When evaluating whether to approve Final Proposals, NTIA will use the same standard of availability used in the Challenge Process Policy Notice, which aligns with the FCC’s National Broadband Map standards. *See* NTIA, Policy Notice: BEAD Challenge Process at 10 (2023), [BEAD Challenge Process Policy Notice \(doc.gov\)](#).

⁵³ To reduce the administrative burden, Eligible Entities may close out all other subgrants while LEO Capacity Subgrants remain open. NTIA will extend the period of performance of the Eligible Entity’s grant if needed to allow for this period of performance.

⁵⁴ For all other BEAD deployment subgrants, NTIA is applying a ten-year Federal interest period. *See* NTIA, Policy Notice: Tailoring the Application of the *Uniform Guidance* to the BEAD Program at 3 (2023), [BEAD Policy Notice: Uniform Guidance Exceptions, Adjustments, Clarifications \(doc.gov\)](#) (“Uniform Guidance Policy Notice”).

⁵⁵ *See* NOFO, Section IV.C.2.b. at 68 (“Operators of Funded Networks shall provide access to broadband service to each customer served by the project that desires broadband service on terms and conditions that are reasonable and non-discriminatory.”).

service at a BSL moves, the LEO service provider must continue to offer service to the BSL, but not necessarily the previous subscriber, under the terms of the subgrant if subsequent occupants request service.

Because of the nature of LEO service, Eligible Entities cannot identify a portion of the LEO network that is dedicated to certain locations in their jurisdiction. Therefore, NTIA will not take a Federal interest in equipment or property acquired or improved with a LEO Capacity Subgrant. Additionally, the consumer and taxpayer protections set forth in the NOFO apply to the recipients of such subgrants for the duration of this ten-year Federal interest period.⁵⁶ Extending the period of performance for LEO Capacity Subgrants⁵⁷ to ten years will help NTIA and Eligible Entities ensure that the consumer and taxpayer protections that apply to all other last-mile deployment projects will apply to LEO Capacity Subgrants for a similar duration.⁵⁸

Third, Eligible Entities may reimburse recipients of LEO Capacity Subgrants in equal installments throughout the period of performance for each location where capacity is reserved. Alternatively, reimbursement may be based on subscriber milestones or another metric that creates an incentive for recipients of LEO Capacity Subgrants to enroll subscribers in BEAD-funded locations. Eligible Entities may advance up to 50% of the total cost of the subgrant: (1) at the time the subgrantee certifies the availability of service throughout the project area; (2) upon the subgrantee meeting subscription milestones established by the Eligible Entity (e.g., 50% of the locations in the project area subscribing to the subgrantee's qualifying broadband service); or (3) a combination thereof. If the Eligible Entity elects to advance a portion of the subgrant, the remaining portion shall be distributed in equal installments across the remaining period of performance. Eligible Entities may provide payment in yearly, semi-annual, or quarterly installments.⁵⁹

Fourth, the Letter of Credit requirement must be administered in a way that incentivizes providers to reach out to potential subscribers to encourage adoption. This is because LEO subgrantees will receive funding for solely reserving capacity rather than constructing a physical network, and as a result, may have less incentive to pursue subscribers. Consistent with this reimbursement model, the LEO provider may reduce its Letter of Credit or performance bond by 50% at the point of certification that service is available to each location in the project area. The Letter of Credit can be reduced by an additional 25% of the original amount after the subscription rate reaches at least 25% of all locations in the project area and may be closed out

⁵⁶ See NOFO at 64-71.

⁵⁷ Subgrants solely for LEO capacity do not acquire or improve any real property and NTIA will not take a Federal interest in the LEO network capacity in LEO Capacity Subgrants.

⁵⁸ See Uniform Guidance Policy Notice at 3.

⁵⁹ For example, if the cost of reserving capacity for the extended period of performance is \$100 per location and there are 100 locations, the total funding provided would be \$10,000 and an Eligible Entity could provide a reimbursement of \$1,000 per year, \$500 semi-annually, or \$250 quarterly. The numbers used are for illustrative purposes only and do not correspond to actual costs of LEO Capacity Subgrants.

once the subscription rate reaches 50 percent.⁶⁰ Regardless of the subscription rate, the Letter of Credit may be terminated four years after the LEO Capacity Subgrantee certifies that it can initiate broadband service within 10 business days of a request to any covered BSL in the project area.

Additionally, the NOFO requires the inclusion of clawback provisions and robust subgrantee monitoring practices.⁶¹ As is the case for all other deployment projects, Eligible Entities must distribute funding for LEO Capacity Subgrants on a reimbursable basis (which allows the Eligible Entity to withhold funds if the subgrantee fails to take required actions under the terms of the subgrant).⁶²

In light of the advantages conferred by the unique structure of the LEO Capacity Subgrant to the provider and the higher costs of consumer premises equipment (CPE) essential for delivery of broadband service via LEO satellite, LEO Capacity Subgrantees must provide all necessary CPE at no cost as part of the standard installation for each new subscriber (i.e. for each new resident or group of residents) at the BEAD-funded location throughout the period of performance.⁶³ If the same subscriber requests additional CPE after installation, the LEO Capacity Subgrantee may charge customary rates unless the request is made due to equipment malfunction or damage caused by a weather event.

As explained in the now-revoked Alternative Broadband Technology Policy Notice, determining the financial capacity of LEO providers presents a unique challenge for Eligible Entities as they determine whether applicants meet the subgrantee qualifications described in the NOFO, as modified by this Policy Notice. To reduce the burden on Eligible Entities, NTIA encourages LEO providers to submit audited financial statements to NTIA demonstrating their financial capacity to undertake the commitments of a subgrantee in all areas in which the provider seeks to serve. NTIA, in turn, will work with the provider to develop a financial certification letter documenting the financial capability of the provider. This letter can be relied upon by Eligible Entities in satisfying their obligation to ensure the financial capability of the subgrantee. Eligible Entities may accept this financial certification letter as a part of their qualification process.

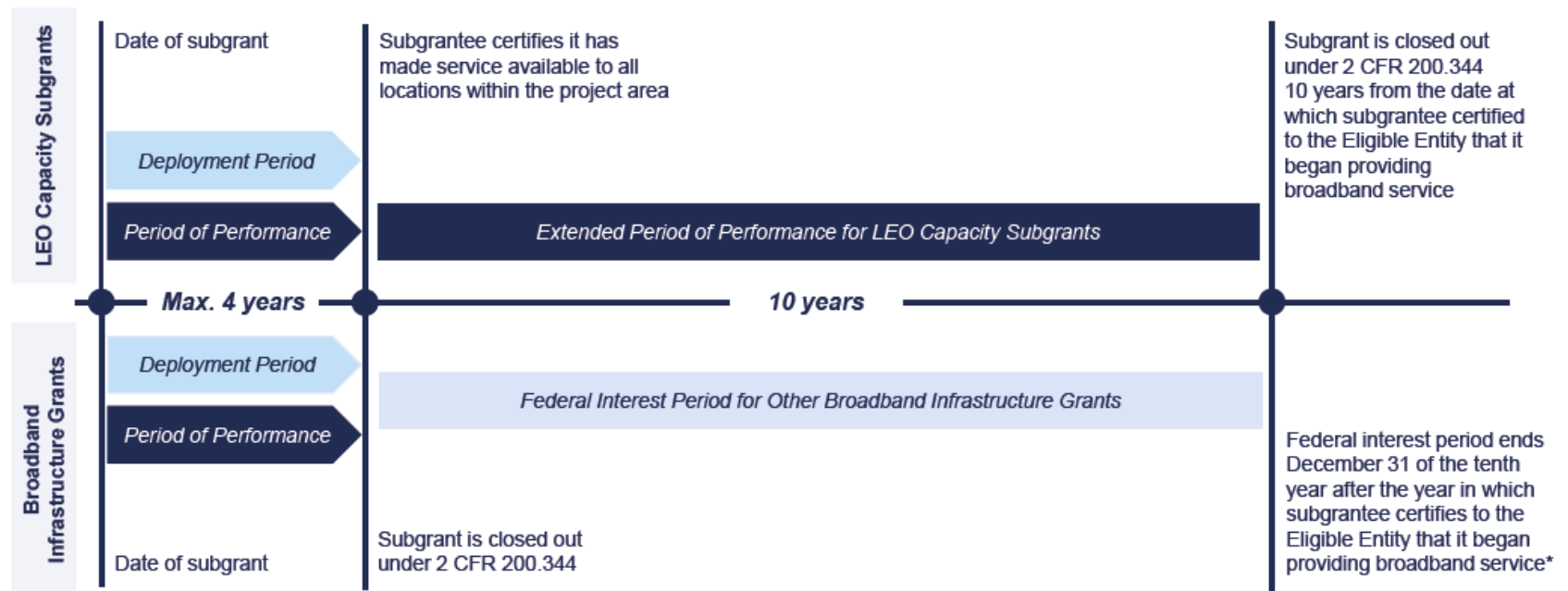
⁶⁰ To further illustrate the Letter of Credit requirement using this example, the original Letter of Credit would have been valued at \$2,500. Upon certification of service availability, the Letter of Credit could be reduced to \$1,250. After achieving a 25% “take rate” in the project area, the Letter of Credit could be further reduced to \$625 and eliminated after reaching a 50% “take rate.” The reduction in the Letter of Credit obligations continues to be allowable even if the subscription rate later drops.

⁶¹ See NOFO at 51.

⁶² See *id.*

⁶³ The LEO Capacity Subgrantee obligation is limited to no more than three (3) CPE during the period of performance.

Appendix C: Period of Performance for LEO Capacity Subgrants and Federal Interest Period for Broadband Infrastructure Grants



*See Tailoring the Application of the Uniform Guidance to the BEAD Program Policy Notice at 9: "The Federal interest in all real property or equipment acquired or improved as part of a subgrant for which the major purpose is a broadband infrastructure project will continue for 10 years after the year in which the subgrant for a project has been closed out in accordance with 2 CFR 200.344. For example, for all subgrants closed out in 2027, regardless of the month, the Federal Interest Period will last until December 31, 2037."

Appendix D: Initial Proposal Correction Template

[AOR Name]
[AOR Title]
[AOR Organization]
[AOR Address]

Courtney Dozier
Acting Director
Broadband Equity, Access, and Deployment Program
National Telecommunications and Information Administration

Re: June 6, 2025 BEAD Restructuring Policy Notice

Dear Mrs. Dozier,

[Insert name of EE] submits this letter to request an Initial Proposal (IP) correction pursuant to the June 06, 2025, BEAD Restructuring Policy Notice. This letter requests incorporation of the terms of the Notice into our IP. [Insert name of EE] confirms that it must modify its previously-approved subgrantee selection process to conform to the terms of the Notice. It will also take all other actions needed to conform the implementation of its BEAD award to the requirements contained in the Notice. [Insert name of EE] [will/will not] submit a budget modification to accompany this IP correction request.

Sincerely,
[AOR Name]
[Date]