



**District of Columbia
Office of the Chief Technology Officer
Broadband Equity, Access, and Deployment Program
Final Proposal**

This report was prepared by the District of Columbia's Office of the Chief Technology Officer (OCTO) and its DC State Broadband Office (DC SBO) using federal funds under BEAD award 11-20-B104 from the National Telecommunications and Information Administration (NTIA).

This is a draft document being posted for public comment for eventual submission to NTIA, consistent with NTIA's BEAD Restructuring Policy Notice. Comments submitted will be considered and changes may be made to this document before its updated Final Proposal submission to NTIA as part of the BEAD process. Accordingly, nothing in this document should be considered a binding commitment by DC SBO, as changes are possible prior to final submission.

This document and all attachments are formatted as required by NTIA. The NTIA-mandated prompts are included verbatim to help the public understand the information flow contained herein. Comments as to this document should be sent by email to octo.grants@dc.gov. Comments will be received until 11:59 PM on October 23rd, 2025.

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Final Proposal Data Submission

The Eligible Entity must submit data as comma separated values (CSV) files using templates provided by NTIA to document its deployment subgrantee selection outcomes. Not using the templates provided, making modifications to formulas, failing to fully complete all required fields, or changing the types of column content will result in NTIA rejecting the Final Proposal until curing is addressed.

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

DC SBO Response: See attached *fp_subgrantees.csv*.

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

DC SBO Response: See attached *fp_deployment_projects.csv*.

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

DC SBO Response: See attached *fp_locations.csv*.

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

DC SBO Response: See attached *fp_no_BEAD_locations.csv*.

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

DC SBO Response: Yes, DC OCTO intends to use BEAD funds to serve CAIs and certifies that it ensures coverage of broadband service to all unserved and underserved locations, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C § 1702(h)(2).

0.6 Attachment (Required – Conditional on a ‘Yes’ Response to Intake Question 0.5): Complete and submit the CAIs CSV file (named “*fp_cai.csv*”) using the NTIA template provided. Although CAIs are not included under (f)(1) deployment projects to confirm the Eligible Entity’s compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTIA template is required. The Eligible Entity must only include CAIs funded via BEAD in this list; the Eligible Entity may not propose funding CAIs that were not present on the approved final list from the Eligible Entity’s Challenge Process results.

DC SBO Response: See attached *fp_cai.csv*.

Subgrantee Selection Process Outcomes (Requirement 1)

The purpose of this section is for the Eligible Entity to provide data on the allocation of grant funds in adherence with its approved Initial Proposal, as modified by the BEAD Restructuring Policy Notice, and document the outcomes of the Subgrantee Selection Process. It requires the Eligible Entity to provide a transparent and detailed account of how it fulfilled its approved Initial Proposal commitments in a fair, open, and competitive manner. Each Eligible Entity must demonstrate that the outcomes of its process prioritized serving unserved locations first, underserved locations second, and (if applicable) CAIs last. The Eligible Entity must also show that its process aligned BEAD grant funds with other funds for broadband that the Eligible Entity receives from the federal government, an Eligible Entity, or any other source.

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

DC SBO Response:

DC SBO has long been committed to using available resources through fair, open, and competitive processes to deploy broadband to unserved and underserved residents. The subgrantee process described in the sections below will outline specific safeguards to ensure that each round of the DC SBO’s subgrantee selection process was fair, open, and competitive.

The District of Columbia’s subgrantee selection followed the process approved by NTIA in the Initial Proposal and modified as necessary to incorporate the BEAD Restructuring Policy Notice. Following NTIA’s June 6, 2025, BEAD Restructuring Policy Notice (RPN), DC’s State Broadband Office (DC SBO) provided guidance on updated eligibility requirements, evaluation criteria, and the elimination of the designated regulatory requirements, which was compliant and outlined how the process would prioritize serving unserved locations first, underserved locations second, and Community Anchor Institution (CAI) locations last.

DC SBO conducted an initial subgrantee selection round prior to the restructuring, but no preliminary and provisional subaward selections had been finalized before June 6th. DC SBO subsequently conducted the first “Benefit of the Bargain” (BoB) subgrantee selection round for every BEAD-eligible location from July 11th through July 27th. A webinar was held on July 10th, 2025, to outline the process and updated RFA requirements. Thirteen attendees were present during the webinar. Office hours were held on July 17th to allow applicants to obtain clarifications and ask questions about the RFA. Due to all locations being reached in the initial BoB round, and no instance of competing projects, a Negotiation Round was not required.

After sharing the results of the first BoB round with NTIA, DC SBO received a directive to conduct a second BoB subgrantee selection round for every BEAD-eligible location that ran from September 19th to October 5th, 2025. An informational webinar was held on September 18th. Eighteen attendees were present for the webinar, including at least three traditional Internet Service Providers (ISPs). Office hours were held on September 25th to give applicants opportunities to ask questions and receive guidance for BoB Round 2. There were five attendees at the office hours, including at least two traditional ISPs. As in the first BoB Round, due to all locations being reached in the second BoB round, and no instance of competing projects, a Negotiation Round was not required.

Both BoB Rounds allowed applicants – regardless of technology employed or prior participation in the program – to compete on a level playing field undistorted by non-statutory regulatory requirements. Eligible applicants were asked in both BoB rounds to submit proposals detailing their

capacity and project plans. New and previous applicants were eligible to apply in DC SBO's application portal, and previously submitted documentation was allowed to be updated. A panel composed of representatives from the District of Columbia State Broadband Office, DC Net, a division of OCTO which provides managed voice and data connectivity to all District Government buildings, and external contractors reviewed applications using the updated scoring rubric defined in the BEAD Restructuring Policy Notice. This process was designed to focus on Minimum BEAD Program Outlay and secondary scoring criteria, as applicable, as well as prioritize effective and cost-efficient broadband deployment and ensure alignment with the modified requirements' approved selection design. Due to only receiving one responsive application in the initial round and both BoB rounds, the reviews focused on ensuring managerial, operational and financial capacity, eligibility, reliable/resilient technology and compliance.

Note that following the June 6th RPN, no additional locations were added by NTIA, nor were any newly eligible unlicensed fixed wireless providers identified by the District.

Further note that following the initial pre-application screening period and initial application round that occurred prior to the Restructuring, there was only one qualified prospective subgrantee. That subgrantee was the same single applicant of both BoB Rounds 1 and 2.

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

DC SBO Response:

DC SBO committed to using available resources through fair, open, and competitive processes to deploy broadband to unserved and underserved residents. The subgrantee process included specific safeguards to ensure that DC SBO's subgrantee selection process was fair, open, and competitive.

DC SBO incorporated a set of safeguards to ensure a fair subgrantee selection process that was free of collusion, bias, conflicts of interest, and arbitrary decisions.

Safeguards against conflicts of interest: All prospective subgrantees were required to fully disclose any real or perceived conflicts of interest and attest that they agree with these terms. Additionally, District employees who are involved in evaluating subgrant applications were asked to acknowledge that they read the District of Columbia's grants manual, drawing their attention to the section of the manual concerning conflicts of interest; review the financial disclosure standards in the District's Board of Ethics and Government Accountability Ethics Manual; and that they do not have any financial conflicts of interest and will disclose any that they later become aware of as all merit reviewers are designated financial disclosure filers by the District.. This aligns with the Code of the District of Columbia, which states, "No employee, member of a board or commission, or a public official of the District government shall engage in outside employment or private business activity or have any direct or indirect financial interest that conflicts or would appear to conflict with the fair, impartial, and objective performance of officially assigned duties and responsibilities."¹

¹ Council of the District of Columbia, <https://code.dccouncil.gov/us/dc/council/code/sections/1-618.02>

Safeguards against collusion: As part of the BEAD application requirements, prospective subgrantees were required to attest that they had not colluded with any entities or persons through public statements or private communications. Prospective subgrantees were also prohibited from making any public communication about plans to apply for specific deployment subgrants under the DC SBO until the announcement of final awards.

Safeguards against bias: To guard against bias, the required qualifications for subgrantees were widely published so that all potential subgrantees could review them and consider applying for funds. In addition to website postings, a webinar for BoB rounds were held on July 17, 2025, and September 18, 2025, respectively, and were open to all. Thirteen attendees participated in the July event, and 18 in the September event, including multiple traditional ISPs.

Safeguards against arbitrary decisions: Applications were assessed based solely on the required documentation and scoring criteria and according to the process detailed in the Initial Proposal, and amended Request for Application (RFA) based upon the BEAD Restructuring Policy Notice, all of which are readily accessible to the public. The evaluation and scoring criteria were standardized to preclude arbitrary decisions. The DC SBO will retain records and submit them to NTIA during the review process upon request.

Safeguards to ensure openness: The DC SBO took several steps to ensure a transparent, open process that made information accessible to the broadest possible range of prospective subgrantees. Before the initial subgrantee selection (“SGS”) RFA was published, there was an allotted review period following the public release of grant program rules and required materials so that as many prospective subgrantees as feasible were fully informed about the grant. DC SBO also conducted an additional round of local coordination to disseminate information via the OCTO website (with FAQs), email notices, public webinars, and key stakeholders’ communication channels. DC SBO also engaged with local government partners, internet service providers (ISPs), non-profits, residents, and all interested stakeholders. This period allowed stakeholders to have their questions answered and raised additional awareness of the grant program. After subgrantee selections were finalized, DC SBO publicly released the final selections to ensure transparency throughout the process.

Safeguards to ensure competitiveness: To ensure that the process was competitive, the DC SBO took the following steps:

1. Notify the public of the subgrantee process and eligibility requirements. As described above, OCTO publicized the subgrantee selection process District wide to multiple stakeholders and through multiple channels to encourage broad participation. Providers who met the subgrantee qualifications and who agreed to abide by the sub-granting accountability procedures were eligible to compete.
2. Use competitively neutral evaluation criteria, in accordance with the updated BEAD Restructuring Policy Notice requirements and objectives.
3. Review and assess applications fairly without conflicts of interest, favoritism, and bias. Application reviewers and scorers were required to disclose any potential conflicts of interest.
4. Consider public comments related to competitiveness. The DC SBO documented, evaluated and considered all comments received during the required posting periods prior to finalization.

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

DC SBO Response: Not applicable.

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

DC SBO reviewed its list of CAIs to ensure each institution met the definition of a CAI in accordance with the Infrastructure Investment and Jobs Act (IIJA) and comply with the BEAD Restructuring Policy Notice. After review, three CAIs were removed from the list in compliance with Section 4 of the BEAD Restructuring Policy Notice as they did not meet the Infrastructure Investment and Jobs Act's definition of a CAI. The remaining CAIs are either a school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, public housing organization, or community support organization that facilitates greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals. Prior to the issuance of the BEAD Restructuring Policy Notice, DC SBO had made changes to the listing of eligible CAIs by removing mobile units, major university campuses, served locations, permanently closed locations and DC-Net locations.

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

DC SBO Response: Yes.

Timeline for Implementation (Requirement 3)

*All planned deployment projects that **have** been selected and approved should have anticipated start and end dates listed in the `fp_deployment_projects.csv` submission, which indicates that each project will be completed within four years of the receipt of the subgrant.*

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

DC SBO Response: In each competitive round, DC SBO required all prospective subgrantees to certify that they would meet all of the required timelines of the BEAD program. Additionally, DC SBO vetted the applicant(s) to meet the minimum qualifications for financial and managerial capacity, technical and operational capability, and other requirements outlined in the 47 U.S.C. § 1702(g)(2)(A), the BEAD NOFO, the District's BEAD approved Initial Proposal Volume 2, and supplementary NTIA guidance. This included, for example, due diligence on experience with

federal and state grant programs, reviewing letters of recommendation, where applicable, and evaluation of financial records. DC SBO also required all technical documentation and timelines to be certified by a Professional Engineer, stating that the proposed network can deliver broadband service that meets the requisite performance requirements to all locations that will be served by the project. Additionally, the professional engineer was required to certify that the applicant is technically qualified to not only complete construction of the proposed network but also to successfully operate the network within the four-year period of performance.

Oversight and Accountability Processes (Requirement 4)

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

DC SBO Response: Yes.

- Contact the Office of the Inspector General (OIG) or call the hotline at (800) 521-1639 or (202) 724-8477.

4.2 Attachments: Upload the following two required documents:

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

DC SBO Response: Please see attached DC SBO BEAD Monitoring Plan and Payment Policy.pdf and OCTO Grants General Terms and Conditions.

DC SBO is utilizing a reimbursement-basis award, thus only disburse funds for completed deployment activities that comply with the terms included in the subgrant agreement and will withhold funds for failure to do so. DC SBO may also include clear penalties in the subgrant agreement for non-performance, failure to meet statutory obligations, or wasteful, fraudulent, or abusive expenditure of grant funds. Such penalties include, but are not limited to, imposition of additional award conditions, payment suspension, award suspension, grant termination, de-obligation of funds, claw back provisions (i.e., provision allowing recoupment of funds previously disbursed), and debarment of organizations and/or personnel.

DC SBO will implement a robust subgrantee reporting and monitoring plan as outlined in Requirement 4.2 above and attached, to include the items published in the RFA guidance and included in the OCTO general terms and conditions, and other regulatory requirements. Monitoring will include frequent communication between the compliance team and the subgrantee with the goal of ensuring a compliant and successful collaboration. Monitoring activities may include both desk reviews of documentation submitted by subgrantees and on-site review of deployment activities. Additionally, DC SBO will provide subgrantees with training and technical assistance on program related matters.

Documentation of communications will be captured in electronic format. Any delinquencies in project requirements will be documented and may result in corrective action being issued to the subgrantee along with further reporting and status reporting requirements. Subgrantees will be required to submit periodic reports for each funded project for the duration of the agreement. At a minimum, subgrantees will provide project and expenditure reports, to include but not be limited to, expenditures, project status, subawards, geospatial/mapping data, information about subcontracted entities and performance reports, to include, but not be limited to, project outputs and outcomes. Information and documentation related to the requirements above will be collected and reviewed by qualified personnel.

Finally, DC SBO will implement a closeout of the subgrantee agreement after all applicable administrative and program requirements have been completed for each program award. Remedies for lack of performance or noncompliance matters will be defined within the subgrantee agreement.

4.3 Question (Y/N): Certify that the subgrant agreements will include, at a minimum, the following conditions:

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

DC SBO Response: Yes, the subgrant agreements will include, at a minimum, the referenced requirements. DC SBO's subgrant agreement is available at <https://www.techtogetherdc.com/deployment>.

Local Coordination (Requirement 5)

The purpose of this section is to detail how an Eligible Entity has coordinated with communities within its jurisdiction after submitting its Initial Proposal. The Infrastructure Act establishes minimum requirements for coordination with political subdivisions of the Eligible Entity. The Eligible Entity is required to (1) allow political subdivisions to submit local broadband plans for consideration and (2) participate in the public comment period.

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

DC SBO Response: Upon approval by NTIA, the District of Columbia State Broadband Office will conduct a 7-day public comment period, from October 17th to 23rd, to allow the general public the opportunity to provide feedback. There are no political subdivisions within the District. DC SBO will make the Final Proposal available for public comment through a public posting on their website, announcing the public comment period through various public channels, including an email to the Tech Together DC community and the application portal. Comment will be provided via email until the publicized close date. DC SBO will review all public comments submitted and incorporate feedback as applicable.

A high-level summary of the comments received will be provided with submission of this Final Proposal along with a description of how the office incorporated feedback into its Final Proposal submission.

Challenge Process Results (Requirement 6)

The purpose of this section is to ensure that the Eligible Entity has successfully accomplished the following objectives based on its Challenge Process results:

- *Identified enforceable commitments funded by the federal government or by the Eligible Entity, within the jurisdiction of the Eligible Entity, to deploy qualifying broadband (including on Tribal Lands).*
- *Identified each unserved, underserved, and served location within the Eligible Entity in its final list of eligible locations.*

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

DC SBO Response: Yes. The Challenge Process was conducted September 17 – December 10, 2024. The results were approved by NTIA on January 14, 2025, and published on DC SBO's website on January 15, 2025.

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

DC SBO Response: [Deployment | techtogether.dc.gov](#) and [Challenge Process | techtogether.dc.gov](#) includes the final listings and post-challenge maps. The changes to the post-challenge listings are described in the *fp_no-BEAD_locations.csv* file submitted.

Unserved and Underserved Locations (Requirement 7)

The purpose of this section is to ensure that all unserved and underserved locations, as identified upon conclusion of its Challenge Process as required under 47 U.S.C. § 1702(h)(2), will be served. The accurate identification of unserved and underserved locations is essential to achieving the goals of the BEAD program of universal coverage. The responses in this section must match the information provided in the Eligible Entity's submitted CSV files.

Coverage of Unserved Locations

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

DC SBO Response: Yes.

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

DC SBO Response: Not applicable.

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

DC SBO Response: Not applicable.

Coverage of Underserved Locations

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

DC SBO Response: Yes.

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

DC SBO Response: Not applicable.

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

DC SBO Response: Not applicable.

7.7 Question (Y/N): Certify that the Eligible Entity has utilized the provided reason codes to investigate and account for locations that do not require BEAD funding, that the

Eligible Entity will utilize reason codes 1, 2, and 3 for the entire period of performance, and that the Eligible Entity will maintain documentation, following the guidelines provided by NTIA, to justify its determination if there is a reason to not serve any unserved or underserved location on the NTIA-approved Challenge Process list through a BEAD project. The documentation for each location must be relevant for the specific reason indicated by the Eligible Entity in the fp_no_BEAD_locations.csv file. The Eligible Entity shall provide the documentation for any such location for NTIA review, as requested during Final Proposal review or after the Final Proposal has been approved.

DC SBO Response: Yes.

7.8 Question (Y/N): Certify that the Eligible Entity has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that the Eligible Entity was notified of and did not object to, and/or federally-funded awards for which the Eligible Entity has discretion over where they are spent (e.g., regional commission funding or Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects.

DC SBO Response: Not applicable. No locations were removed due to Reason Code 4, Enforceable Commitments.

Implementation Status of Plans for Cost and Barrier Reduction, Compliance with Labor Laws, Low-Cost Plans, and Network Reliability and Resilience (Requirement 11)

The purpose of this requirement is to ensure the Eligible Entity is making progress towards the implementation of plans approved in its Initial Proposal, as modified by incorporating the BEAD Restructuring Policy Notice. This requirement also aims to ensure each Eligible Entity is continuing to implement plans to reduce costs and barriers to deployment, account for network reliability and resilience, and address eligible subscribers' access to affordable broadband service options.

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

DC SBO Response: In Progress. D.C. is committed to improving broadband access and connectivity in the most efficient, cost-effective manner. Over the past decade, D.C. has looked for creative solutions to many obstacles that broadband expansion may present. Since then, DC SBO has taken action and enabled other stakeholders to set themselves up for success. The proposed deployment subgrant project(s) fully leverages existing infrastructure to reach 100% of all unserved and underserved locations, as well as the CAIs. This reduces costs by limiting permitting needs and streamlining last-mile access.

Given the focus on tech-neutrality and minimum BEAD program outlay for deployment projects, the District's deployment allocation has not been fully utilized post-preliminary subgrantee selection due to the efficient use of resources to reach all unserved, underserved and CAI locations and achieve the benefit of the bargain. As such, there is still a broad range of initiatives that go beyond infrastructure the District seeks to deploy in order to increase access

to digital tools, services and opportunities in further support of closing the digital divide.

These include initiatives outlined in the District's Initial Proposal, as approved by NTIA and aligned with 47 U.S.C. 1702(f) for broadband adoption. We would seek NTIA's approval to proceed with these initiatives concurrently to the subgrant implementation timeline using the remainder of the allocated deployment funds. The clear intention for the BEAD program from the beginning has been to drive cost-effective investments in broadband networks. These investments will pay dividends not only in bringing communities online faster through cutting-edge and scalable technologies, they will also more meaningfully target programs that develop broadband workforces, upskill our communities, and improve digital literacy.

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

DC SBO Response: Yes.

11.3 Text Box (Optional – Conditional on a 'No' Response to Intake Question 11.2):

If the Eligible Entity does not affirm that subgrantees were required to certify compliance with federal labor and employment laws, explain why the Eligible Entity was unable to do so.

DC SBO Response: Not applicable.

11.4 Question (Y/N): Certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.²

DC SBO Response: Yes.

11.5 Text Box (Optional – Conditional on a 'No' Response to Intake Question 11.4): If the Eligible Entity does not certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period², explain why the Eligible Entity was unable to do so.

DC SBO Response: Not applicable.

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

DC SBO Response: Yes.

11.7 Text Box (Optional – Conditional on a 'No' Response to Intake Question 11.6):

If the Eligible Entity does not certify that subgrantees have ensured planned for the reliability and resilience of BEAD-funded networks in their network designs, explain why the Eligible Entity was unable to do so.

DC SBO Response: Not applicable.

Substantiation of Priority Broadband Projects (Requirement 12)

12.1 Text Box: Describe how the Eligible Entity applied the definition of Priority Project as

defined in the Infrastructure Act and the BEAD Restructuring Policy Notice.

DC SBO Response: DC SBO applied the BEAD June 6th Restructuring Policy Notice definition of Priority Broadband Project: one 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. This definition enabled the District to embrace technology neutrality and fully realize the benefit of the bargain.

DC SBO applied a methodical evaluation process—assessing applications on speed, latency, and scalability—to certify the BoB Rounds supported current and future connectivity needs. As a result of the final BoB Round:

- All BSLs and CAIs served using terrestrial fixed wireless technology.
- An updated infrastructure plan promoting long-term economic development for residents and businesses.
- Projects with proven capacity to meet today's demand challenges as well as easily scale for future needs of residents, thriving businesses and tourism.
- Technology-neutral solutions that perform at the required speeds.

As a result of the Benefit of the Bargain Round 2, one Priority Broadband Project was identified, with no competing applications.

Subgrantee Selection Certification (Requirement 13)

The purpose of this section is to ensure the Eligible Entity followed the BEAD Restructuring Policy Notice to award subgrants through a fair, open, and competitive process. This section also aims to ensure that the level of benefits (i.e., a particular score, additional points in scoring criteria, lowest cost) given to provisionally selected subgrantees align with the commitments the prospective subgrantees provided the Eligible Entity.

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

DC SBO Response: DC SBO evaluated subgrantee applications according to the prioritization framework in Section 3.4 of the BEAD June 6th Restructuring Policy Notice. These criteria allowed DC SBO to assess competing Priority Broadband Project applications (as defined in Section 12.1 above), as well as competing Non-Priority Broadband Project applications. Note that there were no competing Non-Priority Broadband Project applications submitted during either of the District's BoB rounds.

Application Scoring: Each application was scored according to the criteria below. Each application received points under each category and could receive up to the maximum number of points in the option under which they fall. The updated scoring rubric per the Restructuring Policy Notice is

shown below. Note that due to not completing the initial subgrantee selection round, no points were awarded for preliminary / provisional subgrantees, though we did allow previous applicants to update their previous submissions or retain their previous responses and supporting documentation except where required changes were needed due to the restructuring changes.

Scoring Criteria	Options	Max # of Points
Primary Scoring Criteria		
Minimum BEAD Program Outlay		
	Option 1: Request is lowest-cost option	30
	Option 2: Request is within 10% of lowest cost option	20
	Option 3: Request is within 15% of lowest cost option	10
	Option 4: Request is greater than 15% of lowest cost option	0
Secondary Scoring Criteria		
Speed to Deployment		
	Option 1: Commitment less than or equal to 1 year	10
	Option 2: Commitment greater than 1 year but less than or equal to 2 years	7
	Option 3: Commitment greater than 2 years but less than or equal to 4 years	5
	Option 4: Commitment greater than 4 years	0
Speed of Network/Other Technical Capabilities		
	Option 1: Minimum 1000/1000 Mbps speed	50
	Option 2: Minimum 400/100 Mbps speed	35
	Option 1: Minimum 200/50 Mbps speed	20
	Option 1: Minimum 100/20 Mbps speed	5

Environmental and Historic Preservation (EHP) Documentation (Requirement 14)

The purpose of this section is to ensure that the Eligible Entity provides information on how it will ensure subgrantees will comply with environmental and historic preservation requirements including but not limited to the National Environmental Policy Act of 1969 (42

U.S.C. 4321, et seq.) (NEPA), Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470 et seq.) (NHPA), Section 7 of the Endangered Species Act (16 U.S.C. 1521, et seq.), Section 404 of the Clean Water Act (33 U.S.C. 1251, et seq.), and all other applicable Federal, state, and local environmental laws and regulations.

It is a BEAD program imperative to ensure projects are in environmental compliance and a condition of the award that each Eligible Entity is a joint lead agency for NEPA.

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

- Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's programmatic and National Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.
- Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.
- Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/regional-programmatic-environmental-impact-statements>.
- Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.
- Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

DC SBO Response: See attached *DC SBO EHP Requirement 14.pdf*

Consent from Tribal Entities (Requirement 15)

The purpose of this section is to ensure that proper guidelines, regulations, and Tribal consent with respect to Tribal Lands were followed for deployment projects on Tribal Lands. For the program's specific instructions on obtaining Tribal consent in the case of consortia, projects in Hawaii, and projects in Alaska, please refer to footnote 70 on page 48 of the BEAD NOFO.²

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

² This guidance does not supersede state or territory-specific waivers previously granted pertaining to Tribal consent.

DC SBO Response: Not applicable. D.C. contains no federally recognized Tribal Lands.

Prohibition of Excluding Provider Types (Requirement 16)

The purpose of this section is for the Eligible Entity to certify that it conducted an open subgrantee selection process that did not exclude any of the provider types listed in the Infrastructure Act.

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

DC SBO response: Yes.

Waivers

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

An Eligible Entity must describe any waiver(s) that are in the process of review or have been approved by the NTIA as part of the BEAD Initial Proposal or at any point prior to the submission of the Final Proposal. Include details on the requirement(s) addressed by the waiver(s) and date(s) of submission.

If no waiver requests have been or plan to be initiated, the Eligible Entity should note 'Not Applicable' in this text box.

DC SBO response: SBO plans to apply the NTIA approved waivers applicable to all Eligible Entities. The District was granted a waiver on September 19, 2025 in order to conduct a second BoB Round at the request of NTIA, with an updated Final Proposal submission deadline of October 31, 2025. No additional waivers are requested.

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

DC SBO response: Not Applicable.