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**DRAFT – VERIFICATION NEEDED**

**Key Changes in the 2025 NOFO**

1. Elimination of Non-Statutory Requirements

 • Labor/DEI Rules Removed:

 • Prior requirements for fair labor practices, DEI compliance, and contracting with minority/women-owned businesses are eliminated (NOFO Sections IV.C.1.e-g) .

 • Impact: Missouri’s previous scoring criteria (e.g., workforce diversity points) no longer apply.

 • Climate Resilience Plans Axed:

 • Projects no longer need climate adaptation plans (NOFO Section IV.C.1.h) .

 • Impact: Missouri’s prior emphasis on disaster-resistant infrastructure is now optional.

 • Open Access/Net Neutrality Scrapped:

 • Rules prohibiting data caps and requiring wholesale network access are abolished (NOFO Sections IV.C.2.c.ii, IV.C.2.c.v) .

 • Impact: ISPs no longer need to offer open-access networks or avoid usage limits.

2. Technology Neutrality

 • “Fiber-First” Preference Ended:

 • Projects using fixed wireless (including unlicensed spectrum) or LEO satellite are now viable if they meet 100/20 Mbps standards (Appendix A) .

 • Impact: Missouri’s prior fiber prioritization is replaced with cost-driven tech neutrality.

3. Low-Cost Service Option (LCSO) Flexibility

 • States Can’t Set Rates:

 • Providers now propose their own LCSO plans, tied to FCC’s Lifeline Program (NOFO Section IV.C.2.c.i) .

 • Impact: Missouri’s $30–$70/month LCSO framework is obsolete.

4. Subgrantee Selection Reset

 • Mandatory “Benefit of the Bargain” Round:

 • States must reopen applications, prioritizing cost-effectiveness (Policy Notice Section 3.3) .

 • Impact: Missouri’s Round 1 preliminary awards are invalidated.

Missouri’s Progress Under the Prior NOFO

Missouri’s Office of Broadband Development (OBD) had advanced significantly before the 2025 changes:

 • Approved Initial Proposal: Volume I (Aug 2024) and Volume II (July 2024) outlined a two-round subgrantee process .

 • Round 1 Applications: 519 proposals covered 192,284 locations (90% of eligible sites) .

 • Sub-Round 1: Launched in Feb 2025 for 21,120 unaddressed locations .

Now Invalidated:

 • DEI/labor scoring criteria.

 • Fiber deployment mandates.

 • State-set LCSO rates.

Steps for Missouri Applicants

1. Revise Existing Proposals

 • Rescoring Required: Remove DEI/labor metrics (previously NOFO Sections IV.B.5.b.11-13) . Focus on cost-effectiveness (Policy Notice Section 3.4) .

 • Fixed Wireless Evidence: Submit data by June 13, 2025, to exclude served locations (Policy Notice Section 4) .

2. Participate in the “Benefit of the Bargain” Round

 • OBD will reopen applications for all eligible locations. ISPs must:

 • Lower Costs: Highlight competitive per-location pricing.

 • Tech Flexibility: Emphasize scalability of non-fiber solutions .

3. Adjust Low-Cost Plans

 • Align LCSO eligibility with FCC Lifeline requirements (Policy Notice Section 2.7) .

4. Monitor Deadlines

 • Revised Final Proposal Due: Sept 2025 (90-day extension from June 6) .

 • NTIA Review Expected: By Dec 2025 .

Speculative Challenges

 • LEO Satellite in Rural MO: While allowed (Appendix B), Missouri’s terrain may limit reliability .

 • State vs. Federal Conflicts: Missouri’s labor/environmental laws might clash with federal waivers (Policy Notice Section 2) .

Conclusion

The 2025 NOFO prioritizes cost and speed over equity, creating both opportunities (e.g., tech flexibility) and hurdles (e.g., rescoring). Missouri stakeholders must act swiftly to adapt proposals, engage with OBD’s revised process, and navigate federal/state overlaps