

MISSOURI BEAD GRANT PROGRAM

Notice of Program Changes due to Federal Restructuring Policy Notice

Issued: July 3, 2025

I. Summary

The <u>BEAD Restructuring Policy Notice</u>, June 6, 2025 ("Restructuring Notice") issued by NTIA requires Missouri to rescind all preliminary BEAD awards and conduct a new, abbreviated subgrantee selection process for all BEAD-Eligible Locations in Missouri. This notice provides guidance to subgrantees in Missouri about how OBD will implement this new guidance by informing potential applicants what has changed from the Missouri BEAD Grant Program Round 1 Application Guidelines issued Dec. 4, 2024 ("Guidelines"). This Notice does not address areas unchanged by the Restructuring Notice. This Notice supersedes any parts of the previously issued Guidelines where there is a conflict.¹

Changes include:

- (1) Key Date changes, including the deadline for Missouri to submit its BEAD Final Proposal to NTIA;
- (2) The elimination of subrounds and BAFOs within the rounds;
- (3) The map of Application Areas and BEAD-Eligible locations may change;
- (4) Applicants can essentially "deselect" excessively high-cost BEAD-Eligible Locations from an Application Area in the new Round 1;
- (5) The list of CAIs may change as OBD reviews them as directed in the Restructuring Notice;

¹ Missouri's Initial Proposal Volumes I and II are also superseded by this Notice where there is conflict or changes were required by the Restructuring Notice. See <u>BEAD FAQs Vol. 10</u>, FAQ 2.1.

- (6) The fiber preference is eliminated, with scalability being what distinguishes a Priority Broadband Project from the rest;
- Technologies other than fiber can apply in the revised Round 1 as well as Round 2;
- (8) Scoring rubrics are changed substantially;
- (9) The Low-Cost Service option is modified, and Eligible Subscriber is modified to match the FCC's Lifeline Program;
- (10) The Middle-Class Affordability Plan is eliminated;
- (11) Unique requirements for low earth orbit participants are established (see Appendices B and C of the Restructuring Notice);
- (12) Other changes that are not required by statute or regulation (see the Restructuring Notice).

Prior to the Restructuring Notice, Missouri had completed Round 1 of its tworound award process. OBD will consider whether an applicant in that round was a preliminary awardee solely for purposes of the revised scoring rubric. All pre-Restructuring Notice Round 1 applicants must submit a new application in the new Round 1 and/or Round 2. If an entity has already been prequalified, no new Pre-Qualification Application is needed.

Missouri will conduct two rounds of subgrantee selection under the revised process. In the first round, applicants will submit proposals to serve Application Areas as those areas are already defined Missouri's BEAD Program, but with a new option to exclude some locations (described in more detail in this Notice). In the second round, applicants will submit proposals to serve any set of BEAD-Eligible Locations not preliminarily awarded in Round 1.

II. Key Dates (all times are Missouri CDT)

Pre-Qualification Application:

To apply in New Round 1:	deadline is July 9, 2025, 5 p.m.
To apply in New Round 2:	deadline is Aug 8, 2025, 5 p.m.
Application Round 1:	July 10, 12 a.m. to July 24, 2025, 5 p.m.
Scoring/Award of Round 1:	July 25 to August 8, 2025
Application Round 2:	Aug. 9, 12 a.m., to Aug. 15, 2025, 5 p.m.
Scoring/Award of Round 2:	Aug. 16 to 22. 2025
Submit Final Proposal to NTIA:	Sept. 4, 2025 (absent an extension)

III. Overview and Timeline

A. Pre-Qualification

The Pre-Qualification Requirement and process for BEAD applications remains the same. Previously pre-qualified applicants remain prequalified. Applicants that submitted a Pre-Qualification Application before this Notice that were being cured should continue the curing process. Only applicants that have not previously submitted a Pre-Qualification application need to submit a new Pre-Qualification Application.

Pre-Qualification Applications must be submitted 15 days before the conclusion of the application round in question. Applicants participating in Application Round 1 must submit the Pre-Qualification Application by July 9, 2025, at 5 p.m. CDT. Applicants participating only in Application Round 2 must submit the Pre-Qualification Application by August 25, 2025, at 5 p.m. CDT. Applicants that have not completed the curing process for their Pre-Qualification Application before OBD is ready to make preliminary grant awards for each application round will not be considered for funding; it is the obligation of the applicant to respond to questions from OBD in a timely manner, providing documents or information, to ensure they meet this deadline.

B. Application Round 1

The revised Round 1 will consist of applications to serve Application Areas, less any excluded excessively high-cost BEAD-Eligible Locations. OBD will begin accepting Round 1 Applications on July 10, 2025, and close the Round 1 application window on July 24, 2025, at 5 p.m. CDT. No Round 1 applications will be accepted after the application window closes. Applicants should leave themselves time to address technological issues associated with the Application platform (e.g., time to upload documents) ahead of this deadline.

C. Round 1 Scoring

OBD Round 1 scoring and subgrantee preliminary selection activities will take place from July 25, 2025, to August 8, 2025. Once necessary reviews are complete, OBD will notify preliminary awardees that they have been selected for funding. Preliminary awards cannot be publicly announced by OBD or the applicant. Restrictions on public announcements remain unchanged by the Restructuring Notice.

D. Application Round 2

The revised Round 2 will consist of applications to serve BEAD-Eligible Locations that remain available after the Round 1 preliminary awards. OBD will begin accepting Round 2 applications for such BEAD-Eligible Locations on August 9 and close the Round 2 application window on August 15, 2025, at 5 p.m. CDT. No Round 2 applications will be accepted after the Round 2 application window closes. Applicants should leave themselves time to address technological issues associated with the Application platform (e.g., time to upload documents) ahead of this deadline.

E. Round 2 Scoring

OBD Round 2 scoring and preliminary subgrantee selection activities will take place from August 16 to August 22, 2025. Once necessary reviews are complete, OBD will notify preliminary awardees that they have been selected for funding. Preliminary awards cannot be publicly announced by OBD or the applicant. Restrictions on public announcements remain unchanged by the Restructuring Notice.

F. Public Comment/Final Proposal to NTIA

The general requirements regarding submission of the Final Proposal to NTIA and a public comment period are not changed by the Restructuring Notice. OBD will follow those requirements. Under the Restructuring Notice, however, Missouri must submit its Final Proposal by September 4, 2025, unless it obtains an extension from NTIA.

IV. Mapping of BEAD-Eligible Locations—Revisions

Before July 10, 2025, OBD will publish a list of BEAD-Eligible Locations that will be available for funding after the completion of the processes described in the "Unlicensed Fixed Wireless Locations", "Community Anchor Institutions" and "Defaults" sections below, as required by the Restructuring Notice.

OBD will also advise participants of locations likely to be removed from BEAD projects in OBD's Final Proposal on the basis that they are non-Broadband Serviceable Locations (non-BSLs) or are part of enforceable commitments not accounted for in Missouri's Approved Initial Proposal Volume I challenge process.

A. Unlicensed Fixed Wireless Locations

The Restructuring Notice requires states to conduct a notification and evidence review process to determine whether unlicensed fixed wireless service appearing on the FCC National Broadband Map should preempt BEAD funding before opening for applications in the new Rounds 1 and 2. OBD issued a notice to begin this process on June 6, 2025. Unlicensed fixed wireless providers that indicated an intention to assert service availability through this process by June 13, 2025, were informed of the evidence requirements and have seven calendar days to provide the evidence to OBD. Locations will be removed from BEAD eligibility to the extent that the provider meets OBD's evidence requirements and establishes its ability to meet the requirements of Appendix A of the Restructuring Notice.

B. Community Anchor Institutions

OBD has reviewed and finalized a new list of Community Anchor Institutions based on NTIA's narrower interpretation of the defined term as set forth in the *Restructuring Notice*. Each Community Anchor Institution has been assigned an Application Area and 1 Gbps/1 Gbps service to these locations will be a factor in award decisions.

C. Defaults

The Restructuring Notice requires states to add BEAD-Eligible Locations associated with enforceable commitment defaults identified by NTIA. NTIA identified no defaults in Missouri that would add locations to Missouri's list of BEAD-Eligible Locations. As such, no locations will be added to Missouri's list of BEAD-Eligible Locations on this basis. This aligns with OBD's understanding that all defaults of federally funded deployments in Missouri were incorporated in Missouri's list of BEAD-eligible locations before that list was finalized.

D. Footnote 44 Mapping Adjustments, including non-Broadband Serviceable Locations (non-BSLs)

Pursuant to Footnote 44 of the Restructuring Notice (p. 13), OBD has identified a subset of locations that are candidates for inclusion in the Final Proposal as non-BSLs (Final Proposal reason codes 1, 2, and 3) or are subject to enforceable commitments (reason code 4) (Provisionally Identified Non-BSLs). OBD will indicate these locations on its published list of locations prior to Round 1 opening so applicants can remove them from their applications at their own discretion.

If an applicant proposes to serve Provisionally Identified Non-BSLs, OBD will interpret this as an indication that the applicant believes the location to be BEAD-eligible and is willing to extend service. If an application including such locations is selected for award, OBD will postpone inclusion of these codes for the locations in its Final Proposal and work with the awarded provider to resolve the eligibility of the locations in post-Final Proposal reporting.

OBD will use codes 1, 2, and 3 for the entire Period of Performance, so locations not reported using these codes in the Final Proposal may later be removed from deployment obligations in ongoing reporting.

Internet service providers that believe that locations should be ineligible for BEAD funding on the grounds that they have non-subsidized service (reason code 5) have two options for so indicating to OBD ahead of the submission of the Final Proposal:

- If they plan to apply for BEAD-Eligible Locations in an application containing the locations with non-subsidized service, they may include these locations in their submitted list of project locations with a notation that the location is already served, or
- 2. They may separately submit these locations as already served using a portal to be established by OBD.

OBD has discretion to decide whether the evidence provided is sufficient for removal of locations under any of these reason codes under the terms of NTIA's Final Proposal guidance. Providers asserting service through either of these methods must submit:

- 1. A map illustrating the relevant portion of their network, uploaded as GIS data in one of the following GIS data formats:
 - a. ESRI Shapefile
 - b. ESRI FileGDB
 - c. GeoJSON
 - d. GeoPackage

Wireless providers must submit this map as coverage polygons using the format required by <u>the FCC for providers submitting polygon coverage</u> <u>maps</u> with the addition of a data attribute field "site_id" uniquely identifying the base station providing service to the area covered by the

polygon and the <u>five supplementary data files required of providers</u> submitting fixed wireless coverage maps to the FCC.

Wireline providers must submit this map as line data representing their existing infrastructure with data attributes <u>matching the data attributes</u> required by the FCC for polygon coverage maps.

- 2. Evidence in at least one of the following additional categories throughout the claimed service area:
 - a. Evidence of subscriptions
 - b. Photographic evidence of infrastructure
 - c. Speed tests

As a guide to this evidence (evidence of subscriptions, photographic evidence of infrastructure, or speed tests) provider must also include a csv file with four fields and one row for each piece of evidence:

longitude	latitude	file_name	notes
Unprojected (WGS-84) geographic coordinate longitude in decimal degrees representing the location of the customer premises or photographed infrastructure associated with the evidence indicated in the "file_name" field. Value must have minimum precision of 6 decimal digits.	Unprojected (WGS-84) geographic coordinate latitude in decimal degrees representing the location of the customer premises or photographed infrastructure associated with the evidence indicated in the "file_name" field. Value must have minimum precision of 6 decimal digits.	The file name, including the extension, of the piece of submitted evidence	Any notes necessary to understand the submitted evidence

For non-subsidized service, locations awarded to another provider will only be removed in the Final Proposal if there is evidence of an attestation from the Page 7 of 18

preliminarily selected awardee that it concurs to not accept a BEAD project for the location. After preliminary subgrantees are selected, OBD will reach out to provisional subgrantees whose awards include locations identified as having non-subsidized service and ask them to so attest. Provided the preliminary awarded subgrantee so attests, a review of the most recent FCC National Broadband Map confirms the existence of corresponding service, and required evidence was submitted, the location will be excluded from any BEAD project and reported using reason code 5.

If an attestation is not forthcoming, or curing of the submitted evidence of service availability is required, OBD will include the locations in Missouri's BEAD Final Proposal as Eligible BSLs and consider updating their status in later reporting.

V. Priority Broadband Projects—Revised Definition

The Restructuring Notice changes the term "Priority Broadband Project" to track the statutory definition instead of being limited to end-to-end fiber-optic. As such, a project is a Priority Broadband Project if it:

(a) provides broadband service at speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads;
(b) has a latency less than or equal to 100 milliseconds; and
(c) 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.

All projects considered for BEAD funding, regardless of whether they are Priority Broadband Projects, must offer (a) and (b)—speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads and a latency less than or equal to 100 milliseconds. The criterion distinguishing a Priority Broadband Project from an eligible project is scalability—whether the proposed project "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."

To apply this test, OBD will ask applicants to indicate:

- 1. The speeds that could be achieved through specific proposed investments using existing technologies to achieve scalability
- 2. The useful life of assets used to deliver BEAD service

- 3. The timeline on which the scalability investments would take place
- 4. The details of the scalability investment required (e.g., equipment purchased, installation requirements) with associated costs
- 5. The capacity of the improved network and the approximate number of broadband-serviceable locations that could be served by the scalability technology deployed for BEAD purposes relative to the applied-for set of locations.

Determinations of Priority Broadband Project will be made on a project-byproject basis, not categorically for a given technology or applicant.

VI. Unlicensed Fixed Wireless

Unlicensed fixed wireless (ULFW) providers intending to participate in BEAD will be required to establish that they "have taken the steps necessary to resolve potential interference and capacity constraints associated with such technology" as laid out in Appendix A of the Restructuring Notice.

In addition to other evidence substantiating the elements required in Appendix A of the Restructuring Notice, unlicensed fixed wireless providers must provide:

- Fixed broadband availability polygons indicating the area served by each tower. <u>Polygons must match the specifications used in FCC</u> <u>Broadband Data Collection for fixed broadband availability polygons</u> with the addition of one field – titled "site_id" – indicating the unique site ID in the "Fixed Wireless Base Station Location and Height" file submitted as part of the Fixed Wireless Broadband Supporting Data submission that provides the service indicated by the polygon.
- Fixed wireless broadband supporting data matching the specifications used in the FCC Broadband Data Collection for <u>fixed broadband</u> <u>supporting data for providers submitting availability polygons</u>.

ULFW providers that fail to provide sufficient evidence will not be considered for BEAD funding. This process is separate from determination of Priority Broadband Project status, and ULFW applicants that fail to satisfy Appendix A requirements will not be considered for award even if other applicants for the area are extremely high cost.

VII. Eligibility and Other Program Requirements

A. Technology-Neutral

Both rounds will be open to all prequalified applicants, regardless of the technology used.

B. Application Cap—Applies to each Round versus just Round 1

OBD will not accept more than \$300 million in grant requests from a single applicant in each round of the program.² This total is evaluated independently in each round: an applicant could apply for \$300 million in funding in Round 1, as well as \$300 million in Round 2. The prioritization when the sum of applications exceeds \$300 million is as set forth in the Missouri BEAD Grant Program Guidelines, page 4—the application that brings the cumulative total above \$300 million and all subsequent applications in the round will not be accepted by OBD.

C. Excessive Cost Threshold (new standard)

The Restructuring Notice requires Priority Broadband Projects to be rejected if the cost of the project is excessive. OBD will consider a project to "incur excessive costs" if it requests BEAD funding per location of more than \$15,000 ("Excessive Cost Threshold").

D. Low-Cost Service Option (amended standard)

The Restructuring Notice eliminates the portion of the BEAD Notice of Funding Opportunity (NOFO) associated with the statutory Low-Cost Service Option. OBD will no longer require applicants to charge a particular rate for their Low-Cost Service Option unless the applicant receives a waiver from OBD.

² OBD determines that this mechanism continues to accomplish the important goal of (a) incentivizing high-quality application by requiring applicants to pick their strongest potential proposals, (b) reducing over-reliance on a single provider or a small set of providers, and (c) enlisting a variety of providers working simultaneously on BEAD projects. This mechanism was determined by NTIA to be an acceptable element of OBD's Initial Proposal under the terms of the BEAD NOFO; no element of the Restructuring Guidance preempts this approach. Unit cost applicants indicating a capacity to serve more than \$300 million worth of locations based on their unit price will be treated as having submitted a capacity to serve locations equivalent to \$300 million divided by their unit price.

Applicants will still be required to offer a Low-Cost Service Option at speeds of at least 100/20 Mbps and latency performance of no more than 100 milliseconds that will be available to any household seeking to subscribe to broadband internet access service that is eligible for the FCC's Lifeline program. OBD will still require providers to indicate the details of their Low-Cost Service Option as part of their Application. These modified requirements supersede the Guidelines §11.1.

E. Middle Class Affordability Plan (eliminated)

The NOFO requirement to develop, implement and report on a middle-class affordability plan are eliminated as the requirement was not statutory and other stated reasons. Guidelines §11.2 is no longer applicable.

F. Labor, Employment, and Workforce Development Requirements (eliminated or substantially reduced)

The Restructuring Notice eliminates all non-statutory requirements related to labor, employment, and workforce development. The statute requires the prioritization of projects based on "a demonstrated record of and plans to be in compliance with Federal labor and employment laws." 47 U.S.C. § 1702(h)(1)(A)(iv)(IV).

The Restructuring Notice eliminates the following sections of the NOFO, along with any corresponding reporting requirements: "Fair Labor Practices and Highly Skilled Workforce"; "Advancing Equitable Workforce Development and Job Quality Objectives"; and "Civil Rights and Nondiscrimination Law Compliance"; and "Contracting with Small and Minority Businesses, Women's Business Enterprises, and Labor Surplus Area Firms". Guidelines §18.6(f) is no longer applicable.

To meet the statutory requirement, the Restructuring Notice requires Missouri to require subgrant applicants to certify compliance with Federal labor and employment laws.

G. Open Access/Net Neutrality (eliminates non-statutory requirements

The Restructuring Notice eliminates the:

(1) "Consumer Protections" section of the NOFO that required Missouri 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." Guidelines §11.3(a) is no longer applicable;

- (2) "Interconnection Requirements and Wholesale Access" section of the NOFO (§ IV.C.2.c.v, pg. 69) (note 47 U.S.C. §1702(h)(4)(H) has some requirements that are in that section of the NOFO, but the statute will still apply; Guidelines §11.6 address this statutory requirement and at this time, OBD does not expect it to be affected);
- (3) "Conduit Access Points" section of the NOFO to the extent it imposes additional obligations beyond those in the statute. The staute does require that subgrantees "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, so that requirement remains. 47 U.S.C. § 1702(h)(4)(D). Guidelines §10.3 is superseded.
- H. Environmental and National Historical Preservation (EHP) Requirements (mandated NTIA Tool for OBD)

While the EHP requirements are not changed by the Restructuring Notice, NTIA is requiring that OBD use the Environmental Screening and Permitting Tracking Tool (ESAPTT) with NTIA's goal of issuing NEPA approvals more quickly.

VIII. Round 1 Selection Process

In Round 1, applicants will submit proposals to serve OBD-defined Application Areas.

A. Project Definition

OBD will use the same Application Areas as in the original Round 1, subject to limited changes in eligible locations described in the mapping section above. Applicants must apply for a set of Application Areas. Applicants may remove from their applications up to 20% of locations in the Application Area, including any locations indicated as non-BSLs or possessing unsubsidized service and any locations the applicant believes unduly drives up project costs. Applicants will indicate the locations removed by submitting a csv file with the following fields:

location_id	application_id	reason_code	sub_code
The FCC designated location ID being	The name of the application area	Reason code aligned with version 1.2 of the	Subcode aligned with version 1.2 of the NTIA Final Proposal Guidance

removed from the	associated with	NTIA Final Proposal	for codes 1 and 2. Enter
project	the location ID	Guidance	NA for reason codes other than 1 and 2
	1: Location should not have a broadband connection	D: Location has been demolished and is not expected to be rebuilt (with code 1)	
		2: Location does not need mass-market broadband service due to the nature of use	B: Residential location is not habitable (with code 1)
		3: Not used for this submission	U: Location is a support structure (e.g., a garage, parking structure, barn, silo, storage shed) to a
	4: Not used for this submission	nearby building (with code 1)	
		5: Location is already served by non-subsidized service (privately funded network)	M: Location is intended to be mobile and has not been permanently installed in its current location (e.g., it is an RV
		6: Not used for this submission	or boat) (with code 1)
		7: Not used for this submission	R: Location is not a building but a land or natural formation, such as a large rock or
		8: Applicant determines that location is excessively high cost or	collection of hay bales (with code 1)
	would otherwise make the project economically unviable for the technology being used	Z: Location is not serviceable for another reason (with code 1)	
		E: Enterprise location (with code 2)	
			P: Government Property (with code 2)

Round 1 Applicants will be preliminarily awarded Application Areas in which their proposal was selected using the process described below, with the indicated locations removed. Removed locations will be carried over to Round 2. Applicants may submit multiple applications proposing the use of different technologies to serve the same application areas. In cases where two of an applicant's applications are in competition for the same application area such that, had the winning application not been submitted, the applicant's other application would have been awarded, the applicant may choose to withdraw its winning application in favor of the runner-up application.

B. Excessive Costs and Priority Broadband Projects

To determining whether projects are excessively costly, OBD will divide the total BEAD outlay requested by the number of locations in the application area after excluded locations have been removed. If this results in a per-location cost higher than OBD's Excessive Cost Threshold, the proposal for that application area will not be considered for award.

Before awarding projects OBD will conduct a priority broadband project analysis to determine whether candidate projects for award represent Priority Broadband Projects. A non-Priority Broadband Project will be considered for award only if every Priority Broadband Project is over OBD's Excessive Cost Threshold.

C. Selection and 15% Cost Window Scoring Rubric

If there is a Priority Broadband Project that does not exceed the Excessive Cost Threshold, and there are no other Priority Broadband Projects, the Priority Broadband Project will be preliminarily awarded the Application Area (minus removed locations).

In the case of multiple Priority Broadband Projects, the lowest cost Priority Broadband Project (that does not exceed the Excessive Cost Threshold) will be preliminarily awarded an Application Area (minus removed locations), if the next-lowest cost Priority Broadband Project is not within 15% of the costs of the lowest cost. If there are multiple Priority Broadband Projects, any that are within 15% of the lowest cost one ("15% Cost Window"), there is a scoring of those projects using the scoring rubric in the table below. The Application with the highest score will be preliminarily awarded the Application Area (minus removed locations).

If no Priority Broadband Project is below the Excessive Cost Threshold and no non-Priority Broadband Project requests a BEAD outlay within 15% of the cost of the lowest-cost non-Priority Broadband Project, the lowest-cost non-Priority Broadband Project will be preliminarily awarded the Application Area (minus removed locations).

If no Priority Broadband Project is below the Excessive Cost Threshold or there is no Priority Broadband Project, and there are multiple non-Priority Broadband Projects, the lowest costs one and any that are within the 15% Cost Window will be scored using the scoring rubric in the table below. The Application with the highest score will be preliminarily awarded the Application Area (minus removed locations).

15% Cost Window Scoring Rubric:

Only for the purposes of selecting between proposals separated by less than 15% of the cost of the lowest cost proposal, proposals will be scored using the following criteria.

Speed of Technology				
Less than 1 Gbps / 500 Mbps	0 points			
Greater than or equal to 1 Gbps / 500 Mbps and less than 1 Gbps / 1 Gbps	5 points			
Greater than or equal to 1 Gbps / 1 Gbps	10 points			
Latency				
> 100 ms	0 points			
Less than or equal to 100 ms and greater than 50 ms	5 points			
Less than or equal to 50 ms	10 points			
Round 1 Preliminary Subgrantee				
No	0 points			
Yes	2 points			
Speed to Deployment				
Applicants may assume that subgrants will be issued Dec. 4, 2025.				
Project completion within 3 years of receipt of subgrant	1 point			
Date within 2 years	2 points			
Date within 1 year	4 points			
Maximum Points	26 points			

IX. Round 2 Selection Process

In Round 2, applicants will submit proposals defining their own project areas as sets of BEAD-Eligible Locations (versus Application Areas). The Application Areas preliminarily awarded in Round 1 will no longer be eligible for award, except for locations removed from the awarded projects.

A. Project Definition

Applicants may choose to define their Round 2 projects in three ways:

- 1. At a location level: Applicants may submit an indication of the BEAD grant required to extend service to a specific BSL, which could be awarded separately.
- 2. As a unit price: Applicants able to deliver service anywhere in the state for a uniform price may indicate the BEAD grant they would charge to bring service to any address. This would be treated as a unit-level application for every location in the state. Applicants may also indicate that they could only serve a limited number of locations at the unit price.
- 3. As a grouped project: Applicants may submit a list of locations to be treated as a grouped project and indicate the BEAD grant required to extend service to all the included locations. These applications would be awarded as a unit.

Round 2 Applications need not serve a defined portion of any Application Areas that includes their applied-for locations.

When comparing projects defined at a location level to projects defined at a grouped project level for the same set of locations, OBD will compare the cumulative location-level grant requests to the project grant request.

When two grouped projects submitted by different providers overlap, OBD will deconflict the projects by evaluating the best possible combination of projects that would serve all locations in both the overlapping projects, awarding the combination of grouped projects and by-application projects with the lowest cost and, as appropriate, a higher score by secondary criteria.

Applicants may submit multiple applications proposing the use of different technologies to serve the same set of locations. In cases where two of an applicant's applications are in competition for the same set of locations such that, had the winning application not been submitted, the applicant's other application would have been awarded, the applicant may choose to withdraw its winning application in favor of the runner-up application.

B. Excessive Costs and Priority Broadband Projects

To determining whether projects exceed the Excessive Cost Threshold, OBD will divide the total BEAD outlay requested by the number of locations in the submitted project.

Before awarding projects OBD will conduct a priority broadband project analysis to determine whether candidate projects for award represent Priority Broadband Projects. A non-Priority Broadband Project will be considered for award only if the lowest-cost Priority Broadband Project is over OBD's Excessive Cost Threshold.

C. Selection and 15% Cost Window Scoring Rubric

The Selection and Scoring will be the same as in Round 1 except it will be for locations, not Applications. The 15% Cost Scoring Rubric will be the same as for Round 1, with the following special processes.

- When comparing projects defined at a location level to projects defined at a grouped project level for the same set of locations, OBD will compare the cumulative location-level grant requests to the project grant request.
- When two grouped projects submitted by different providers overlap, OBD will deconflict the projects by evaluating the best possible combination of projects that would serve all locations in both the overlapping projects, awarding the combination of grouped projects and by-application projects with the lowest cost and, as appropriate, a higher score by secondary criteria.
- For purposes of awardee selection, groups of projects assembled to deconflict overlapping projects will be treated as Priority Broadband Projects if all constituent projects are Priority Broadband Projects, and non-Priority Broadband Projects if any constituent project is not a Priority Broadband Project.
- Projects combined for deduplication purposes will be assigned a score reflecting the average score of constituent projects weighted according to their share of project area locations.

X. Final Dispositions

Should Round 1 and Round 2 result in a location or set of locations with no BEAD project or permissible non-service code, OBD will take steps to identify a preliminary award for these locations prior to its Final Proposal.

OBD will first consider whether reasonable adjustments to discretionary rules in this Notice (e.g., a reasonable increase in the per-location Excessive Cost Threshold) would make the area awardable based on applications received. If such adjustments be possible, they will be made, and the resulting provisional award incorporated into the draft Final Proposal.

Should applications received be insufficient to preliminarily award the unawarded locations despite reasonable adjustments to discretionary rules in this Notice, OBD will provide applicants for the area and adjacent areas a short window to adjust their proposals to extend service to the unserved locations on acceptable terms. Should multiple applicants agree to do so, their proposals will be compared using the general rules for subgrantee selection above. The selected proposal will be incorporated into the draft Final Proposal.

Contact

Office of Broadband Development

Missouri Department of Economic Development

For additional information, visit

https://ded.mo.gov/programs/community/broadband-equity-access-anddeployment-bead-program

For questions or technical assistance contact the OBD team:

Email <u>broadband@ded.mo.gov</u>

Phone 573/526-1028