

FREQUENTLY ASKED QUESTIONS (FAQS)

District of Columbia Office of the Chief Technology Officer (OCTO)

Broadband Equity, Access, and Deployment (BEAD) Program

Last-Mile Broadband Deployment Projects

Updated: 3/28/2025

1. Who is managing the District of Columbia (DC) Broadband Equity Access and Deployment (BEAD) deployment subgrantee process?

DC's State Broadband and Digital Equity Office (SBDEO) is DC's broadband office, housed within the Office of the Chief Technology Officer (OCTO). The SBDEO has managed DC's BEAD program, including creating the Five-Year Action Plan, the Digital Equity Plan, and Initial Proposal Volumes I and II, while also managing DC's BEAD deployment and non-deployment programs and subgrantee selection processes. The SBDEO Team is led by Administrator Kevin Hughes, and OCTO is led by Chief Technology Officer Stephen Miller. Further details on the SBDEO can be found at the Tech Together website: www.techtogetherdc.com.

2. Who is eligible to apply for a BEAD deployment grant in the DC?

Eligible applicants include internet service providers (ISPs), community-based organizations, non-profit entities, and other entities capable of deploying broadband infrastructure. Applicants must demonstrate their ability to provide high-speed broadband to all unserved and underserved locations within a defined project area.

- Section IV.C.1.a. of the BEAD NOFO holds that Eligible Entities may not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments (“potential providers”) from eligibility for grant funds.

3. Which documents should I prepare as an applicant for BEAD deployment funding?

A non-exhaustive list of documents requested in the pre-application include:

- A copy of the entity's current and active SAM.gov registration.
- W-9 dated in the past year.
- Resumes for each essential financial, technical, and managerial key personnel.
- An organizational chart in PDF format detailing all parent companies, subsidiaries, and affiliates.
- A list of all associated entities that are regulated by the Federal Communications Commission (FCC) or are an applicant for an FCC license including proof of

ownership information for entities that own 10 percent or more of stock, whether voting or nonvoting, common or preferred.

- A comprehensive ownership chart to illustrate the relationships between the listed owner entities detailing both direct and indirect stakeholders, along with the nature of their interests. It must also clearly delineate the direct or indirect connections among the entities.
- A current Certificate of Good Standing from the DC Department of Buildings.
- A validated Certificate of Clean Hands (CCH) from the DC Office of Tax and Revenue.
- Pre-existing occupational training, certification, and licensure for all members of the project's workforce.
- Evidence that demonstrates timely filing of the Federal Communications Commission's Form 477 and Broadband DATA Act submissions. Acceptable evidence includes email confirmations or screenshots of verification.
- Evidence to demonstrate readiness to successfully deploy a BEAD project. This should highlight sufficient operational capabilities and can include:
 - Resumes of significant personnel
 - Detailed project descriptions and narratives from contractors, subcontractors, or partners with relevant operational experience, and/or
 - Any other comparable evidence underlining operational proficiency.
- If partnering, a letter of intent from the collaborating organization(s) stating that it agrees to participate in the proposed project, describing the partner's involvement and resource commitments, and explaining the activities and/or services the partner will provide. The letter should demonstrate that the partnering organization understands the project presented for funding and the activities and/or services that the partner will provide. Under the grant terms and conditions, grant-related work or activity that is contracted, sub-contracted or Sub-Grantee must comply with applicable District laws, including business licensing requirements and documentation of a claimed tax-exempt status.
- A cybersecurity risk management plan.
- A supply chain risk management plan.
- Audited financial statements for the last two years certified by an independent certified public accountant.
 - Ensure SBDEO has audited financials for all organizations that comprise the entity applying. If only a single set of audited financial statements exists, the parent company's statements should suffice; however, please clearly identify all involved entities (e.g., parent, subsidiary) in the application.
 - If audited statements are qualified, please include an explanation as a cover memo with the financial statement audit.
 - If the entity has not undergone an audit in the ordinary course of business, they must submit unaudited financial statements from the previous two fiscal years and certify that audited statements from the prior fiscal year,

prepared by an independent certified public accountant, will be provided upon award.

- If audited statements are unavailable, please include an explanation as a cover memo outlining the lack of audit, along with current year interim financial statements (e.g., Profit & Loss, Balance Sheet, Cash Flow Statement). Audited financial statements from the prior fiscal year will be required before the award is granted.
- For consortium applications, upload audited financial statements certified by an independent certified public accountant for the last two years for each participant in the consortium.
- A document that identifies the sources and amounts of projected match funding from the entity.
- Five years (current year plus four) of financial projections, including Income Statement, Cash Flow, Balance Sheet. Financial projections are required for all entities included in the application and should include at least three years of operating cost and cash flow projections post-targeted completion of the project. Provide associated business plan that supports the financial projections and substantiates the sustainability of the applicant(s) participation in BEAD.
- Documentation and policies concerning the entity's financial system and internal control environment.
- Samples of vendor payments.
- Samples of accounting, grants and budgeting.
- Samples of record retention.
- Samples of inventory and property management.
- Samples of policies minimizing/avoiding waste, fraud and abuse.

For a full list of documents, please review the BEAD Deployment Pre-Application at <https://wdcbroadband.submittable.com/submit>.

4. How do I register for an account to submit an application?

Through the SBDEO Pre-Application Portal located at:
<https://wdcbroadband.submittable.com/submit>.

5. Where can I find the latest map of eligible locations?

On the SBDEO Website [2025 DC BEAD Information | techtogetherdc.com](https://www.techtogetherdc.com).

6. How do I view and select the project areas which I would like to apply for?

The project areas map is available on the SBDEO website at [techtogetherdc.com](https://www.techtogetherdc.com) and applications will open to qualified entities who pass the pre-application process.

7. Where can we find the names and address of the eligible locations and the number of units at each location?

Results of the challenge process are posted on the Tech Together website at [techtogether.dc.gov](https://www.techtogetherdc.gov) under the tab BEAD and then subheading 2025 DC BEAD Information. A direct link to that page is <https://www.techtogetherdc.com/copy-of-dc-bead-program-initial-propo>.

8. You have shown the underserved and unserved. We have seen the list of Eligible CAIs (1230). It appears DC Net will be used to expand to these facilities. Will there be an opportunity for fiber construction companies to build out these networks? What about the ongoing provision of broadband services to these facilities?

During the Initial Proposal process DC had to explain how we applied the statutory definition of Community Anchor Institution (CAIs). DC executed a challenge process that allowed challenges to be brought by nonprofit organizations or broadband service providers concerning any broadband serviceable location which the challenger feels qualifies as a CAI, according to the existing categories of CAIs identified in the statutory definition. The resulting 84 unserved and 4 underserved locations are the locations for which we are seeking eligible entities to complete deployment.

Updated Answer 2/28/25: The challenge process resulted in 4 underserved locations, not 5. Prospective subgrantees will be required to provide service to all unserved and underserved locations and eligible CAIs within each project area unit in the application.

9. A number of states have implemented a Residential Retrofit program using BEAD dollars. This provides funding for affordable housing developers and public housing to upgrade their networks. This obviously helps connect "covered populations" with broadband but it also helps with the affordable housing crisis. Will DC be considering a Residential Retrofit Program?

When DC opens our non-deployment application process, we will consider applications for all nondeployment eligible uses prescribed in the BEAD Notice of Funding Opportunity (NOFO) and make selections that align activities with the objectives, goals, intentions, and purpose defined in our State Digital Equity Plan (SDEP).

10. For the challenge results, we are able to see names for CAIs but for the underserved and unserved we only have location IDs. Can you tell us the addresses and unit counts associated with these location IDs?

You can match the location IDs in the unserved and undeserved locations list with the list of CAIs that indicate which location ID is associated with which CAI.

Updated Answer 2/28/25: Addresses and unit counts are not permissibly disclosed information from the challenge process.

11. Are all of the underserved and unserved locations CAIs in addition to the CAIs listed separately?

The underserved/unserved CAIs are a subset of the full list of CAIs.

Updated Answer 2/28/25: The underserved and unserved locations are separate from the CAIs.

12. It appears that some of the text entry questions have a 500-word limit, which is about a page of text single-spaced. Will the word limits for each individual question allow for a thorough response?

We will review the word limits for each question to ensure they allow for thorough responses.

13. Do you anticipate changes in priorities to the Deployment process as NTIA staff and leadership gets acclimated?

We are proceeding under existing guidance and our approved Initial Proposal Volumes 1 and 2 and monitoring the situation regularly.

14. Does the lead applicant have to meet the requirements mentioned or can it be a collaborative of organizations?

All entities participating as members of a consortium must meet all of the stated requirements under the BEAD grant.

15. Can you explain a bit further what the "deployment" work will be? Are you looking for entities to build out to these CAIs and then provide ongoing service?

Under DC's BEAD grant, infrastructure or "deployment" refers to providing high-speed internet connectivity to all unserved and underserved locations within the district. Entities will be required to build out last mile connectivity to these locations and then provide ongoing service.

16. Are both for-profits and nonprofits eligible?

Yes, under the BEAD grant for profits and nonprofits are eligible to participate.

17. Will entities be expected to provide ongoing network maintenance and customer support after completing construction?

Yes, entities will be expected to provide ongoing network maintenance and customer support after completing construction.

18. What is the phase 2 timeline and when will the phase 2 grants be announced?

Phase 2 for deployment will open on 3/7/2025.

Updated Answer 2/28/25: Phase 2 for deployment will open on 3/14/25.

19. Can you explain a bit more about Phase 2 for deployment?

Prospective subgrantees that meet all qualification requirements will be invited to participate in the subgrantee selection process. Prospective subgrantees that fail to meet all qualification requirements will be unable to proceed with the first round of applications. Qualified prospective subgrantees will be able to submit applications for any selection of project area units. Prospective subgrantees will be required to provide service to all unserved and underserved locations and eligible CAIs within each project area unit in the application.

20. The timeline slide showed that the non-deployment NOFA would be issued imminently and the non-deployment RFA could start in March, around the same time as the deployment RFA. Is that correct?

Yes, both the deployment and non-deployment process will have overlapping competition periods.

21. Is 5G fixed wireless solution allowable alternatively to fiber-to-premise?

Yes, the National Telecommunications and Information Administration (NTIA) supports 5G fixed wireless access (FWA) as an alternative broadband technology.

22. Will the middle mile be DC-Net? Will the last-mile provider be able to buy transport capacity from DC-Net to serve these locations?

Not at this time.

23. Can you tell us when the nondeployment NOFA will be coming out?

The Non-Deployment NOFA was released on 2/7/2025 and is available on our website, techtogetherdc.com.

24. Do you anticipate that CBE status will give preference to grant applicants?

All applicants participating in the District's BEAD sub-grantee selection processes must be a CBE and must be a business headquartered or registered within the District of Columbia and certified by the Department of Small and Local Business Development (DSLBD).

Updated Answer 3/5/25: No, there are no scoring criteria that give preference to CBE status of applicants.

25. Outside of BEAD, are there other grant programs that we can discuss with OCTO?

The State Broadband and Digital Equity Office (SBDEO) has oversight of the District of Columbia's federal awards under the BEAD grant, the Digital Equity Capacity grant, and the Capital Projects Funds (CPF). The SBDEO will conduct a fair, open, and competitive sub-grantee selection process under each of the grants, where eligible entities are encouraged to participate. You can find more information about these grants on our techtogetherdc.com website.

26. Can SBDEO please provide data associating the BEAD-eligible locations and CAIs with the four Project Areas? Releasing this data will help ensure that applicants associate the BEAD-eligible locations and CAIs with the correct Project Areas. The data could be either a spatial file or adding a project area identifier to the BSL and CAI eligible location lists.

Per your request, attached please find the spatial boundary file of our DC project areas, which can also be found on the techtogether@dc.com site next to our Project Area Map.

27. Is there a minimum matching requirement for BEAD deployment applicants?

Per the BEAD NOFO, selected subgrantees must provide a match at a minimum of 25% of total project costs. As outlined in DC's Initial Proposal, applicants with a higher match, or lower project costs, will receive a higher score.

28. Can I use funding from other federal funding programs to fulfil matching requirements (e.g., ARPA Capital Projects Fund)?

Federal funds may not be used as matching funds, except as expressly provided by federal statute. The Infrastructure Investment and Jobs Act expressly provides that for the BEAD Program, matching funds may come from a federal regional commission or authority and from funds that were provided to a subgrantee for the purpose of deploying broadband service under the following legislation, to the extent permitted by those laws:

- Families First Coronavirus Response Act (Public Law 116-127; 134 Stat. 178);
- CARES Act (Public Law 116-136; 134 Stat. 281)
- Consolidated Appropriations Act, 2021 (Public Law 116-260; 134 Stat. 1182); or
- American Rescue Plan Act of 2021 (Public Law 117-2; 135 Stat. 4)

29. Can I make in-kind commitments to fulfill matching requirements?

Matching funds may be provided in the form of either cash or in-kind contributions, so long as such contributions are made consistent with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards set forth at 2 C.F.R. Part 200.

- In-kind contributions, which may include third-party in-kind contributions, are non-cash donations of property, goods or services, which benefit a federally assisted project, and which may count toward satisfying the non-federal matching requirement of a project's total budgeted costs when such contributions meet certain criteria. In-kind contributions must be allowable and allocable project expenses.
- Examples of in-kind contributions, depending on the particular property or service and the applicable federal cost principles, could include:
 - Employee or volunteer services;
 - Equipment;
 - Use of facilities.
 - Access to rights of way;
 - Pole attachments;
 - Conduits;
 - Easements; or
 - Access to other types of infrastructure

30. Is there a maximum amount of funding I can apply for as an ISP?

Prospective subgrantees are permitted to request up to 200 percent of the reference cost. Per the subgrantee selection process rubric, the distribution of points is based on the percentage of funding requested by the prospective subgrantee relative to the reference cost, meaning that an application requesting a greater percentage of the reference cost will receive fewer points than an application with a lower requested percentage of the reference cost.

31. If I win an award, what can I spend the money on?

Per the BEAD NOFO, eligible uses of funding in connection with last-mile broadband deployment projects include the following:

- Construction, improvement, and/or acquisition of facilities and telecommunications equipment required to provide qualifying broadband service, including infrastructure for backhaul, middle- and last-mile networks, and multi-tenant buildings.
- Long-term leases (for terms greater than one year) of facilities required to provide qualifying broadband service, including indefeasible right-of-use (IRU) agreements.
- Deployment of internet and Wi-Fi infrastructure within an eligible multi-family residential building.
- Engineering design, permitting, and work related to environmental, historical and cultural reviews.
- Personnel costs, including salaries and fringe benefits for staff and consultants providing services directly connected to the implementation of the BEAD Program (such as project managers, program directors, and subject matter experts).
- Network software upgrades, including, but not limited to, cybersecurity solutions.
- Training for cybersecurity professionals who will be working on BEAD-funded networks.
- Workforce development (including registered apprenticeships and pre-apprenticeships) and community college and/or vocational training for broadband-related occupations to support deployment, maintenance, and upgrades.

32. If I win an award, how will I receive funding?

DC will award funding on a purely reimbursement basis. Subgrantees' BEAD funding outlay will be reimbursed on a regular basis, to be determined by the SBDEO. However, reimbursement will only occur if deployment progress milestones outlined in the plan provided by the subgrantee have been achieved. Prospective subgrantees for priority Broadband Projects should be aware that the cost applies to connecting all eligible locations in the applicable project area. If awarded funding, subgrantees must build the network all the way to the customer's premises. All prospective subgrantees must certify that they understand that their cost commitment is binding, and that the SBDEO will not award any additional funds for any other expected costs.

33. If I win an award, how long will I have to use the funding?

As established in Section 60102(h)(4)(C) of the Infrastructure Act, subgrantees that receive BEAD Program funds for network deployment must deploy the planned broadband network and 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 from DC. DC will award higher scores to applicants who state commitments to deploying services at faster speeds.

34. Regarding Affordability, the District's BEAD Initial Proposal Vol. 2 states that it will score applications based on 1 G symmetrical service and requires a maximum monthly rate of \$65 for Priority projects (p. 29), then later states middle class affordability should be \$50/mo for 100/20 (p. 87). Can you please clarify the District's position regarding Affordability?

The 1 Gigabit symmetrical service refers to the priority projects including CAIs that must be connected first. The middle-class affordability provision pricing refers to the federally designated bandwidth speed 100/20.

35. The District's Initial Proposal Vol. 2 states that "[t]he application submission period for the first round of applications will last for 30 days" (p. 22), however, the District opened the application period on March 14 with a deadline of March 30. Would the District consider extending the application period to April 14 to allow the full 30 day application period?

As reflected in our public posting of the NOFAs for both BEAD Deployment and Non-Deployment sub-grantee selection process, we have made necessary modifications to the timeframes on both processes. The updated time frames are also available on the techogetherdc.com website.

36. Please confirm whether a commitment letter for either a letter of credit or performance bond is required at the application phase?

At the time of application, prospective applicants must indicate whether the entity plans to secure an irrevocable standby (LOC) or obtain a performance bond under the conditional programmatic waiver of the (LOC) requirements. If providing a letter of credit, prospective applicants must upload a financial capacity letter from a bank stating the ability to obtain an irrevocable standby Letter of Credit (LOC), in the required form, from an eligible bank or credit union, including the projected maximum amount to be covered by a LOC. If obtaining a performance bond, prospective applicants must upload a letter from a company holding a certificate of authority as an acceptable surety on federal bonds as identified in the Department of Treasury Circular 570 committing to issue a performance bond to the applicant. The letter shall at a minimum provide the dollar amount of the performance bond. If the prospective applicant Entity is prohibited or otherwise unreasonably restricted from entering an LOC or securing a performance bond, they must explain why the entity is prohibited or otherwise unreasonably restricted from entering an LOC or securing a performance bond.

37. Upon award, can awardees obtain either a letter of credit or performance bond in the amount of 10% of the subaward as consistent with the NTIA waiver as long as all required circumstances are met (rather than a letter of credit equal to 25% of the subaward or performance bond equal to 100% of the subaward)

Awardees may avail themselves of the full flexibility afforded by the NTIA BEAD Letter of Credit Waiver.

38. Can an applicant submit an application that covers more than 1 Project Area or does it need to submit each Project Area separately?

Yes, however an applicant is required to cover all of the BSLs and CAIs within each Project Area they apply to cover.

39. Where can I find more information about the BEAD Program and DC's deployment subgrantee process?

- BEAD Deployment Pre-Application Portal- <https://wdcbroadband.submittable.com/submit>
- BEAD NOFO - [BEAD NOFO.pdf](#)
- DC BEAD IPV Volume I [DC BEAD Program Initial Proposal Vol 1 | techtogether.dc.gov](#)
- DC BEAD IPV Volume II [DC BEAD Program Initial Proposal Vol 2 | techtogether.dc.gov](#)
- SBDEO BEAD Deployment Webinar – February 6, 2025 (webinar recording forthcoming)
- Join the SBDEO's mailing list to receive regular updates email us at techtogether@dc.gov

40. Who can I contact with any additional questions?

For questions pertaining to the BEAD Pre-Application Portal please email us at octo.grants@dc.gov. For any other questions please email us at TechTogether@DC.gov

Important Dates

- BEAD “Deployment” NOFA Publication Date: January 31, 2025
- BEAD “Deployment” Pre-Application Window Opens: February 7, 2025
- BEAD (RFA) Posted For Public Comment: February 14, 2025
- BEAD “Deployment” Post Application Window Opens: March 14, 2025