

DEEP Broadband Equity, Access, and Deployment (BEAD) Program Prequalification

Question Period: October 21, 2024 – October 30, 2024

Responses Posted: November 8, 2024

The questions have been organized by theme and may have been edited for clarity.

#	Question	Response
1	If an entity is interested in the program, but unsure about applying for projects, is prequalification still required?	Participation in the Prequalification Process is required to later submit a project application. Note that becoming prequalified does not obligate an interested entity to submit a project application, so all potentially interested entities should still become prequalified to keep their options open.
2	Will a single prequalified applicant be able to propose to serve all remaining underserved/unserved locations in the state?	Yes, a single applicant or application may propose to serve all remaining eligible unserved and underserved locations in Connecticut.
3	Can out of state companies apply for prequalification?	Yes, DEEP encourages out-of-state eligible applicants to participate in the prequalification process so long as they meet the financial, managerial, and technical requirements outlined in the application guidance.
4	Can municipalities apply to the prequalification phase and if so, would a municipality have to partner with an internet service provider?	The BEAD Program considers applicant eligibility based on expertise rather than entity type. DEEP will consider any qualified entity, including municipalities, with the technical, managerial, and financial expertise to design, build, and operate broadband infrastructure in Connecticut. Applicants may submit as individual entities that meet these requirements, or as partnerships of two or more entities that can collectively evidence the required expertise.

5	Should wireless service providers apply for prequalification?	<p>Yes, wireless service providers are strongly encouraged to apply for prequalification.</p> <p>While fiber is the preferred technology of the BEAD Program, all technologies will be considered and may be necessary to achieve universal access. Despite its relatively small size, Connecticut has a varied landscape which spans hard-to-reach rural locations, high-density urban locations with aging infrastructure, and island communities separated by significant stretches of water. As the project application phase grows closer, DEEP will be releasing additional information on these locations and strategies to ensure they are reached.</p> <p>As a reminder, potential applicants considering participating in the BEAD Program <u>must</u> prequalify, but prequalification does not obligate applicants to submit a project application.</p>
4	Will DEEP consider using technologies other than fiber to reach all locations across the state?	<i>Please see the answer to #5.</i>
5	Did Connecticut receive enough money to reach all unserved and underserved locations?	Connecticut is expected to have received sufficient funding to reach all unserved and underserved locations. The final strategy on how this will be achieved, including tentative awardees, technology types, and costs will be published for public comment in DEEP's Final Proposal.
6	DEEP received a number of questions related to deployment requirements in the project application phase, which follows the prequalification phase.	These questions have been recorded and will be included in the project application guidance and/or FAQ at that time. Topics such as project area parameters will be discussed in detail with prequalified entities. As a reminder, only prequalified entities will be able to apply for deployment projects. Please see DEEP's Initial Proposal: Volume 2 for more information.

7	Can information be submitted confidentially? If so, how?	Connecticut’s Freedom of Information Act requires the disclosure of documents in the possession of the State upon request of any citizen, unless the content of the document falls within certain categories of exemption, as defined by Conn. Gen. Stat. § 1-210(b) If the submitter indicates that certain documentation required by the prequalification phase is submitted in confidence, the State will endeavor to keep said information confidential to the extent permitted by law. The submitter should mark such information as CONFIDENTIAL prior to submission and reference the particular section where the information is located. For each section so referenced, the submitter will be asked to provide an explanation and rationale sufficient to justify an exemption of the information under FOIA.
8	Can DEEP provide a written statement demonstrating that financials will be kept confidential?	DEEP is unable to proactively provide a statement that all financial documents submitted will be kept confidential. However, DEEP will withhold the release of financial information that is not publicly available in alignment with C.G.S. 1-210 (5)(B), which exempts records from release under the Freedom of Information Act that contains “Commercial or financial information given in confidence, not required by statute”. Applicants are encouraged to clearly mark such information as “CONFIDENTIAL”
9	Will DEEP be providing applicants with the prevailing wage tables for each of the project areas so that all bidders have access to the same required labor rates when formulating their bids? If not, will awardees be permitted to adjust their award requests post-award once actual prevailing wage rates are determined for their projects?	DEEP is currently reviewing this question as it pertains to the project phase. An answer will be provided as soon as possible. Until then, information regarding Connecticut's prevailing wage requirements and latest rate schedules can be found on the Department of Labor’s website .

10	In the application portal, the “award requested” question in the Project Information section requires applicants to enter a value greater than \$0.00. Does it matter what value is entered?	This question is required by the portal software, but as noted, does not apply to BEAD prequalification process. Any value over \$0.00 can be input to proceed to next page within the portal and will not impact the application in any way.
11	Can DEEP please define supplement managerial capabilities included in question 3.3?	Managerial capabilities refer to the skills, knowledge, and competencies that individual entities and/or partnerships need to effectively plan, implement, and manage broadband deployment projects. If an applicant does not feel it is able to fulfill these requirements itself, it may submit additional information regarding partnerships, independent contractors, consultants, and/or subcontractors it will employ to evidence its capabilities. The specific configuration and details may vary by applicant.
12	Is question 3.7 referring to all broadband deployment projects across an entity's footprint or specific to CT?	The requirement that an applicant submit a list of all of broadband deployment projects that have received or are expected to receive public funding (both state and federal) may be limited to projects within the State of Connecticut. If an applicant does not have any relevant projects to list within the state, they are encouraged to list a relevant sample of projects across their footprint.
13	How is question 3.15 different from previous questions requesting financial information?	Question 3.15 is intended for new entrants and/or a provider of electricity transmission or distribution services. If applicable, you must also provide qualified operating or financial reports that were filed with the relevant financial institution or applicable regulatory agency for the relevant time period. Acceptable submissions to fulfill this requirement include Rural Utilities Service (RUS) Form 7, Financial and Operating Report Electric Distribution; the RUS Form 12, Financial and Operating Report Electric Power Supply; the National Rural Utilities

		<p>Cooperative Finance Corporation (CFC) Form 7, Financial and Statistical Report; the CFC Form 12, Operating Report; or the CoBank Form 7; or the functional replacement of one of these reports.</p> <p>If it does not apply to an applicant’s situation, it may be skipped.</p>
14	<p>In the application portal, Should the format of Questions 3.14 and 3.15 be changed from required uploads to optional uploads? Those questions apply only if an applicant is: (1) a newer entrant to the communications market, or (2) a provider of electricity transmission or distribution services.</p>	<p>Thank you for notifying DEEP of this issue. The application portal settings have been updated to instead list those items as optional.</p> <p>Any additional issues with the portal should continue to be sent to DEEP.Broadband@ct.gov for the quickest response.</p>
15	<p>Could DEEP please clarify what is meant by “subject to recoupment of payments” in question 8.2? It appears DEEP is asking if an entity has had to return a grant, but we would appreciate clarity on if there are certain circumstances that DEEP has in mind.</p>	<p>The request that an applicant disclose whether they have been subject to the recoupment of payments under any federal or state grant is not limited to specific circumstances. An applicant should respond according to whether their business has ever been required to return grant funds.</p> <p>A response of ‘yes’ to this question does not automatically disqualify an applicant from the prequalification process. DEEP may reach out for further information if necessary to determine eligibility.</p>
16	<p>Can an applicant respond to Questions 8.2 and 8.3 in the prequalification application based on the past five-year period?</p>	<p>Yes, per Connecticut’s Initial Proposal, applicants are expected to supply information regarding compliance based on the past five years.</p>

<p>17</p>	<p>Is a letter of credit required for the Prequalification Phase?</p>	<p>No, the prequalification application asks an applicant to <i>provide a description of how the applicant plans to meet the requirements</i> for a letter of credit or performance bond, including whether the applicant intends to make use of any of the alternative options, in alignment with the instructions in the BEAD NOFO as updated by the BEAD Letter of Credit Waiver (11/01/23, NTIA Notice of Programmatic Waiver, https://broadbandusa.ntia.gov/funding-programs/policies-waivers/BEAD-Letter-of-Credit-Waiver).</p>
<p>18</p>	<p>If an applicant has filed an FCC Form 602 and the information is still accurate, can the applicant attach a PDF of its FCC Form 602 to answer any questions that seek information set forth in 47 C.F.R. § 1.2112(a)(1)-(7)?</p>	<p>If the information is up to date, then an applicant may submit the form as evidence in any applicable upload field(s), so long as the information included fully and completely answers the application question(s).</p>
<p>19</p>	<p>Will all awards be considered fixed-amount subawards within the meaning of NTIA's Policy Notice: Tailoring the Application of the Uniform Guidance to the BEAD Program?</p>	<p>A final determination regarding whether awards will be considered fixed-amount subawards will be included in the project application guidance, which DEEP anticipates releasing in early January 2025.</p>
<p>20</p>	<p>Will DEEP align with NTIA's guidance for reducing a letter of credit or performance bond to 10% of the subaward amount, which requires reimbursement "for periods of no more than six months," allowing quarterly (or other more frequent than every six months) reimbursement?</p>	<p>Yes, DEEP will follow guidelines issued by NTIA in its BEAD Letter of Credit Waiver, including that applicants may apply for a reduction of the letter of credit value to 10 percent rather than the default option of 25 percent for the buildout period, or a performance bond in the value of 10 percent rather than the default option of 100 percent. If awarded, the subgrantee will be able to receive funding on a reimbursable basis at least twice per year.</p> <p>Applicants should provide a description of how they plan to meet the requirements for a letter of credit or performance bond, including whether the applicant intends to make use of any of</p>

		the alternative options in alignment with the NTIA waiver, in question 2.2 of the prequalification application.
21	Will DEEP align with the NTIA's modification of the professional engineer requirement to enable applicants to utilize a professional engineer licensed in a state other than Connecticut?	<p>Yes, DEEP will be removing the following sentence from its Initial Proposal (p. 61):</p> <p><i>"DEEP will require that the certifying engineer holds all required professional licenses from the State of Connecticut."</i></p> <p>The professional engineer making certifications in connection with the PE Certification Requirement may be licensed in any state.</p>
22	Does DEEP intend to adopt in full the exceptions, adjustments, and clarifications to certain provisions of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), codified at 2 C.F.R. Part 200, and the application of related provisions of the Uniform Guidance to the Broadband Equity, Access and Deployment (BEAD) Program as set forth in NTIA's Policy Notice: Tailoring the Application of the Uniform Guidance to the BEAD Program? If not, please specifically identify each of the elements of the Policy Notice that are not being adopted by DEEP. Alternatively, please confirm that the	DEEP will align with NTIA recommendations, however, for any exceptions or adjustments related to fixed amount subawards, please refer to #19.

	elements of the Policy Notice are being adopted in full.	
23	Will DEEP extend the Prequalification Phase? What happens if an entity misses the deadline?	<p>In order to meet NTIA deadlines for the Final Proposal, DEEP currently has no plans to extend or repeat the prequalification phase. If an applicant anticipates difficulty submitting a complete application by the deadline, they should reach out to DEEP.Broadband@ct.gov as soon as possible so solutions can be explored together.</p> <p>If an entity misses the deadline but would still like to participate in the BEAD Program, they should also reach out as soon as possible, though DEEP cannot promise that late submissions will be considered.</p>
24	What if there is a required document that an applicant cannot submit?	If an applicant is unable to submit a specific requirement of the application, they should instead submit a narrative explaining why it is missing at the time of submission and detail any efforts the applicant has made/is making to obtain the information.
25	How often will the BEAD Program Prequalification FAQ document be updated?	DEEP will make an effort to update this FAQ regularly until the November 20, 2024 deadline depending on the volume and frequency of inquiries.
26	Will DEEP release a final list of broadband service providers that have prequalified for BEAD once the Prequalification Phase is completed?	Yes, DEEP will post a list of prequalified applicants to its website.