



# State of New Hampshire

## BEAD Final Proposal

Broadband Equity, Access, and Deployment Program

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## Final Proposal Data Submission

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

See Attachment at: [www.nheconomy.com/office-of-broadband-initiatives/bead](http://www.nheconomy.com/office-of-broadband-initiatives/bead)

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

See Attachment at: [www.nheconomy.com/office-of-broadband-initiatives/bead](http://www.nheconomy.com/office-of-broadband-initiatives/bead)

**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.

See Attachment at: [www.nheconomy.com/office-of-broadband-initiatives/bead](http://www.nheconomy.com/office-of-broadband-initiatives/bead)

**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.

See Attachment at: [www.nheconomy.com/office-of-broadband-initiatives/bead](http://www.nheconomy.com/office-of-broadband-initiatives/bead)

**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)?

No. New Hampshire does not intend to use BEAD funds to serve CAIs.

## Subgrantee Selection Process Outcomes (Requirement 1)

**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.

New Hampshire’s Subgrantee Selection Process is in full alignment with the Initial Proposal Volume II (IP V2), as modified and approved by the National Telecommunications and Information Administration (NTIA), and in accordance with the BEAD Restructuring Policy Notice released on June 6, 2025, with two exceptions. First, after NTIA approved Volume II on June 3, 2024, BEA submitted changes in October of 2024 to insert an initial pre-qualification phase into the subgrantee selection process. NTIA approved these updates on November 21, 2024. The changes that incorporate the pre-qualification stage are listed under “Initial Proposal Volume II Change Summary” in the approved Volume II, Version 1.1. Secondly, Volume II at 2.4.3 expressed doubt that there would be sufficient funding for non-deployment activities after deployment activities were funded. However, as noted in Volume II at 2.5.3 and 2.5.4, the State committed to “revisit the non-deployment activities pending availability of funds.” Per NTIA’s BEAD Restructuring Policy Notice, funding for non-deployment purposes is under further review, pending NTIA guidance.

With NTIA’s approval of the modified IP V2 in place and in complete compliance with the approved IP V2, BEA launched the first phase of its selection process. The prequalification window opened on November 22, 2024, and remained open through March 1, 2025. During this time, prospective applicants were required to submit documentation demonstrating financial, managerial, technical, and operational capabilities, in addition to ownership disclosures, compliance attestations, and public funding history. A Pre-Qualification Guide, which provided an overview of procedures, requirements and steps for pre-qualification, was released. In addition, a form was made available for applicants to submit general information. A Signature Page was also published so that applicants could easily submit required certifications. Applicants who submitted sufficient documentation were deemed prequalified, and those with deficiencies were given 15 days to cure them.

The project application phase followed, opening on January 6 and closing on March 1, 2025. As defined in the approved IP V2, Project Service Areas (PSAs) were delineated by towns, cities, and unincorporated places. Applicants were required to complete pre-qualification to submit applications for specific PSAs.

In anticipation of the BEAD Restructuring Policy Notice and in consultation with NTIA, BEA paused the subgrantee selection process prior to making any preliminary awards, in order to ensure full compliance with the new requirements. On June 10, 2025, all previously pre-qualified applicants were notified that they would remain pre-qualified and only need to submit new applications. All previously submitted applications would no longer be under consideration. BEA notified New Hampshire providers of the BEAD Restructuring Policy Notice on June 12, 2025. On June 17, the

initial Updated Subgrantee Selection Guidance and Materials were published. Updated Guidance and new application window dates were provided on June 27, 2025. A Subgrantee Selection Process FAQ was published on July 2, 2025, and a Technical Assistance Office Hour was held on July 11, 2025.

As instructed by the Restructuring Notice, BEA issued a Public Notice on June 16, 2025, to inform all Unlicensed Fixed Wireless (ULFW) providers in New Hampshire that they had seven calendar days to submit evidence that BEAD support was not needed for the areas they covered. On June 19, one ULFW service provider responded that it intended to submit evidence of service and asked if any particular formatting or additional information BEA required. BEA subsequently provided them with both an attestation for verification of ULFW Service document and a ULFW evidence submission template to be completed and returned prior to the deadline. Additionally, BEA provided a ULFW Service Evidence Template Instructions Manual to aid the provider in filling out the evidence template. All of this was sent to the ULFW provider on June 20, 2025. BEA received no further response from the ULFW service provider. No changes were made to the Broadband Serviceable Location (BSL) list as a result.

Further complying with the Restructuring Notice, BEA submitted a formal letter and data to update the locations list. The updated list was based on Version 6 of the FCC Fabric and removed locations that FCC data indicated were served. It reflected locations that do not require BEAD funding (using the reason code process as detailed in the Final Proposal Guidance). There were no additional locations in New Hampshire that were no longer eligible due to a default or change in service area on a Federal enforceable commitment. The ULFW challenge was also reported. The number of eligible locations changed from 9,527 to 5,250 as a result of this update.

As further directed by the Restructuring Notice, BEA submitted an Initial Proposal Correction which conformed to Appendix D of the Notice. The Correction was formally approved by NTIA on June 26, 2025.

BEA then initiated a “Benefit of the Bargain” (BOB) round in compliance with the Restructuring Notice. All project applications received during the earlier window were disregarded. The Benefit of the Bargain application round opened on June 30 and closed on July 18, 2025.

Applicants who had already prequalified were not required to resubmit qualification materials unless updates were necessary. New applicants were permitted to qualify simultaneously with the application process, based upon updated qualification requirements. These requirements included documentation regarding items such as annual required data filings, certifications, financial and managerial capability, compliance with applicable laws, operational capacity, ownership information, public funding information, BABA and Cybersecurity and Supply Chain Risk Management compliance, and Network Resiliency and Reliability information per the BEAD NOFO and BEAD Restructuring Policy Notice.

Further adhering to the Restructuring Policy Notice, many BEAD requirements were removed or streamlined. For example, earlier documentation regarding labor, workforce, civil rights and



nondiscrimination requirements were removed, while applicants must certify that they comply with labor and employment laws. Additional documentation regarding contracting with minority, women-owned and labor surplus firms were similarly removed. In addition, earlier Climate Resilience requirements were removed. Open access, data cap, and network neutrality provisions were scaled back to require conduit access at regular and short intervals, in keeping with legislative requirements. The requirement for a middle-class affordability plan was removed, while requirements for a low-cost service option were streamlined and eligibility definitions were aligned with those of the FCC's Lifeline program.

In accordance with the Restructuring Notice, the BOB round was open to all provider types regardless of the technology or technologies used to provide service. The definition of a "priority project" was broadened in accordance with the Restructuring Notice to include any project that meets the Priority Broadband technical requirements. While the PSA definition remained the same—based on towns, cities, and unincorporated places—applicants were no longer required to propose service to 100 percent of a PSA.

All applicants were required to submit new applications by PSA. Adhering to the BEAD Restructuring Policy Notice, BEA determined the Priority and Non-Priority status of project applications. Following this designation, BEA applied the "Minimal BEAD Program Outlay" scoring criterion as the primary determinant in evaluating competitive applications. In accordance with BEA's guidance, each application was assessed based on the total BEAD funding requested and the cost per passing for each Broadband Serviceable Location (BSL) within the proposed Project Service Area (PSA).

For each application, the total BEAD funding required was calculated by subtracting the applicant's proposed matching funds from the total project cost. The cost per passing was then determined by dividing the BEAD funding required by the number of BSLs proposed to be served within the PSA. The Priority project with the lowest cost per passing was considered the leading proposal. In cases where the leading proposal excluded more than 80% of BSLs—or excluded fewer than 80% but still left out a significant number of locations with reasonable priority bids from another applicant—BEA determined that selecting it would create substantial overbuild and higher costs if the remaining BSLs were served separately. In these instances, BEA instead selected the competing proposal. Although not the lowest-cost option for the specific set of BSLs, this approach was deemed the most efficient because it minimized overbuild, avoided redundant infrastructure, and contributed to the lowest total Program cost across the combination of selected projects.

If an application to serve the same PSA proposed a project with a cost per passing within 15 percent of the lowest-cost proposal received for that same PSA, BEA evaluated the competing applications based on Speed to Deployment, and the Speed of the Network and Other Technical Capabilities. In cases where the secondary scoring criteria produced a tie, BEA selected the project with the lowest cost per passing to ensure the most cost-efficient outcome. More specifics on these secondary criteria are provided in Section 13.1, below. These evaluation procedures ensured continued alignment with the goals of BEA's approved and amended Initial Proposal.

After preliminary winners were selected, BEA grouped locations won by each provider into deployment projects based on geographic region. For example, if an ISP was preliminarily awarded 50 BSLs across 5 municipalities in a single region of New Hampshire, BEA grouped those together as a single project for that region. This was done as part of the best and final offer stage of subrecipient selection, which was requested by the NTIA during Final Proposal curing. Due to these locations being in the same region of the state, by consolidating them into one project, providers were encouraged to find economies of scale and reduce their bids, if possible.

In addition, BEA decided that this consolidation would be beneficial from a monitoring and reporting standpoint. By grouping together multiple PSAs into larger projects, BEA was able to reduce the number of projects from over 200 individual projects to a more manageable 28 projects. BEA feels that this will not only be beneficial to the State, but also to the subgrantees, who will be asked to report on projects on an individual basis.

Through each stage—initial planning, cautious pause, NTIA-approved amendment, and transparent relaunch—BEA took deliberate steps to remain consistent with its approved Initial Proposal and responsive to the BEAD Restructuring Policy Notice. This disciplined approach ensured that the subgrantee selection process was conducted with integrity and in full compliance with NTIA expectations.

**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.

In preparing New Hampshire’s Broadband Equity, Access, and Deployment (BEAD) program, BEA approached its responsibility with a clear mission: to implement a subgrantee selection process that is fair, transparent, and inclusive. That mission was not just aspirational—it was operationalized through every policy, public touchpoint, and procedural safeguard.

Having administered the Capital Projects Fund (CPF), BEA brought valuable experience in managing a rigorous grant process. From day one, its goal was to foster a competitive environment grounded in integrity and designed to prevent favoritism, bias, or conflict of interest.

#### A Fair Process by Design

To ensure fairness, BEA standardized the applicant’s experience. Every prospective subgrantee received the same detailed application guidance and templates, including those for qualification documentation, Project Service Area (PSA) summaries, budgets, non-served Broadband Serviceable Location (BSL) lists, and applicant certifications. A universal application form served as the starting point for all applicants, ensuring no applicant received preferential treatment in format or expectations. The initial prequalification window opened on November 22, 2024, and remained open through March 1, 2025. During this time, prospective applicants were required to submit documentation demonstrating financial, managerial, technical, and operational capabilities, in addition to ownership disclosures, compliance attestations, and public funding history. A Pre-Qualification Guide, which provided an overview of procedures, requirements and steps for pre-

qualification, was released. In addition, a form was made available for applicants to submit general information. A Signature Page was also published so that applicants could easily submit required certifications. Applicants who submitted sufficient documentation were deemed prequalified, and those with deficiencies were given 15 days to cure them.

A standardized scoring rubric, aligned with the BEAD NOFO and the Restructuring Policy Notice, was also employed. Not only was it used consistently by reviewers, but it was also published online as Appendix 5 to the application guidance, giving applicants full visibility into how their submissions would be evaluated. Point weightings were adjusted only in accordance with the restructuring notice, maintaining fidelity to federal guidance while ensuring relevance to state-specific priorities.

Applicants were further required to submit their conflict-of-interest policies and formally certify that safeguards were in place to prevent collusion or unfair advantage. Under N.H. Rev. Stat. § 21-G:38, disclosure of any existing conflicts was mandatory.

Application reviews were conducted in accordance with RSA 15-B:3 and 21-G:25. While technical reviewers assisted in evaluating applications, final determinations were retained by the Office of Broadband Initiatives. This ensured that accountability remained squarely with the public sector. BEA also employed a curing process, where applicants were notified of missing or incomplete materials and given a uniform period to address deficiencies.

#### Openness Through Outreach and Engagement

Transparency was a cornerstone of BEA's process. Stakeholder engagement began well before the application window opened and continued throughout. This included outreach to internet service providers, municipalities, non-profits, and other potential applicants. The agency hosted a series of webinars, posted recordings and guidance documents, and maintained a regular flow of communications.

Public transparency was not an afterthought. Questions raised in office hours or submitted via email were added to a publicly posted FAQ, updated regularly to reflect new insights or clarifications. BEA also extended the application deadline from 30 to 54 days based on applicant feedback, demonstrating responsiveness to real-world concerns.

The timeline below highlights BEA's commitment to openness and stakeholder engagement throughout the process:

Date	Type	Event	Description
11/13/2024	Web Post	BEAD Subgrantee Selection Pre-Qual Phase Information made public	Pre-Qual content added to website; begin accepting submissions 11/22/2024
11/14/2024	Email	BEAD Pre-Qual Announcement (ISPs) & Intro Webinar	NH BEAD Pre-Qual Announcement and Invite to webinar to be held 11/21/2024
11/18/2024	Email	BEAD Pre-Qual Announcement	NH BEAD Pre-Qual Announcement



Date	Type	Event	Description
		(ISPs) & Intro Webinar	and Invite to webinar to be held 11/21/2024
11/21/2024	Webinar	Pre-Qualification Introduction	Detailing requirements and document submission process of Pre-Qualification Phase
11/21/2024	Web Post	Pre-Qual Intro Webinar Recording & Slides made public	Added recording and slides to website
12/4/2024	Email	BEAD Pre-Qual Webinar Announcement (ISPs)	Invitation to attend Q&A session for BEAD Pre-Qualification December 11, 2024
12/10/2024	Web Post	Project Application Period tentative submission window made public	Updated website from "Early 2025" to "expected to open January 6, 2025 - Feb 5, 2025"
12/11/2024	Webinar	Pre-Qualification Office Hours - 30-minute Q&A Session	Open forum for prospective applicants to ask questions
12/20/2024	Web Post	BEAD Subgrantee Selection Application Phase Information made public	Application Phase content added to website
12/20/2024	Web Post	Project Service Areas made public	Project Service Areas (BEAD eligible locations list) posted to website
12/20/2024	Email	BEAD Project Application Phase Announcement (ISPs) - official submission window	Announcement - BEAD Project Application Phase to open January 6, 2025
1/6/2025	Email	BEAD Application Phase Announcement (ISPs) & Webinar Invite	Announcement - BEAD Project Application Phase now open & invite to attend Project Phase Intro Webinar
1/9/2025	Email	Webinar Reminder BEAD Application Phase Announcement - (ISPs)	Reminder of Project Application Phase Intro Webinar
1/10/2025	Webinar	Project Application Phase Introduction	Detailing requirements and document submission process of Project Application Phase
1/16/2025	Web Post	Project Application Intro Webinar Recording & Slides made public	Added recording and slides to website
1/17/2025	Web Post	Subgrantee Selection Process Deadline Extension (March 1, 2025) made public	Project Application deadline updated and top banner announcing extension added to website
1/17/2025	Email	Subgrantee Selection Process Extension Notification (ISPs)	Announcement to ISPs of Subgrantee Selection extension to March 1, 2025.

<b>Date</b>	<b>Type</b>	<b>Event</b>	<b>Description</b>
1/27/2025	Web Post	Subgrantee Selection Office Hours made public	3 additional Office Hours added to list under Technical Assistance
1/27/2025	Email	Subgrantee Selection Office Hours Invitation	Announcement - upcoming office hour sessions
1/29/2025	Webinar	Subgrantee Selection Office Hours - 30-minute Q&A Session	Open forum for prospective applicants to ask questions
2/10/2025	Email	Webinar Reminder - Subgrantee Selection Office Hours	
2/12/2025	Webinar	Subgrantee Selection Office Hours - 30-minute Q&A Session	Open forum for prospective applicants to ask questions
2/24/2025	Email	Webinar Reminder - Subgrantee Selection Office Hours	
2/26/2025	Webinar	Subgrantee Selection Office Hours - 30-minute Q&A Session	Open forum for prospective applicants to ask questions
6/12/2025	Email	Announcement to ISPs of Restructuring Policy Notice	
6/16/25	Web Post	Posting of updated application materials and guidance to the BEA website	
6/27/25	Email	Announcement of the start of the Benefit of the Bargain round on June 30, 2025	
7/11/25	Webinar	Subgrantee Selection Office Hours - 30-minute Q&A Session	Open forum for prospective applicants to ask questions

#### Safeguards to Ensure Competitiveness

New Hampshire's BEAD application process was competitively neutral and designed to encourage deployment of eligible services to all eligible New Hampshire BSLs in the most cost-effective manner possible. All potential providers that met the NOFO's eligibility requirements were able to apply for funding for any project area within the state. Furthermore, the public comment period on the Initial Proposal enabled any potential providers to offer suggested improvements to the

subgrantee selection process as proposed, which were incorporated into the Initial and Final Proposals. BEA continued to solicit feedback from potential providers and other stakeholders through continuous outreach efforts in addition to the public comment process.

During the initial round of subgrantee selection, which was subsequently voided due to the Restructuring Policy Notice, applicants communicated their concerns with the original 30-day application window, and BEA extended the application period from 30 to 54 days.

During the curing process for the Benefit of the Bargain round, all applicants were given the same timeframe for curing. Questions received during the office hours from potential subgrantees were answered and added to an FAQ, later updated for the Benefit of the Bargain round, and posted on BEA's website for all applicants and members of the public to view. Additionally, questions received in the BEA inbox were answered through the FAQ and posted to BEA's website.

Consistent with the Restructuring Notice, all applicants were permitted to seek Priority Broadband Project designation, regardless of the technology or technologies used to deliver service. The scoring rubric's primary criteria provided no advantage or disadvantage to any technology used, nor were any points awarded or deducted based upon the business structure of the applicant (corporation, cooperative, municipality, etc.).

**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.

BEA states it adhered to the process approved in the Initial Proposal, as modified by the BEAD Restructuring Policy Notice, using a multi-phase subgrantee selection process. In New Hampshire's Benefit of the Bargain round, there was first an application phase, then a negotiations phase, with both phases prioritizing awards for Priority Broadband Projects as defined in Section 12.1 of the Final Proposal.

**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.

Not applicable.

**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.

Yes, subgrantee records will be retained in accordance with 2 C.F.R. § 200.334

## Timeline for Implementation (Requirement 3)

**3.1 Text Box:** Has the Eligible Entity taken measures to: (a) ensure that each subgrantee 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.

BEA is implementing a structured monitoring and compliance framework to ensure the timely deployment of broadband infrastructure and compliance with BEAD program requirements. BEA's oversight mechanisms are aligned with 2 C.F.R. 200.344 to ensure that all subgrantees commence service provision within four years of receiving their subgrant, all BEAD-funded subgrant activities are completed at least 120 days prior to the end of the performance period, and all programmatic activities undertaken by BEA are finalized within the award timeline.

BEA has implemented project-specific timelines to ensure that all subgrantees begin providing broadband services within four years of receiving their subgrant. To support compliance, BEA mandates that all subgrantees submit deployment schedules that outline key milestones, as well as Capital Investment Schedules that demonstrate complete build-out and initiation of service within the four-year timeframe. BEA will enforce milestone tracking through quarterly reporting and monitoring. If subgrantees fail to meet deployment benchmarks, BEA may impose corrective action plans, funding adjustments, or reallocation of resources to ensure timely completion.

To comply with BEAD NOFO Section VII. E and 2 C.F.R. 200.344, BEA has structured its subgrantee agreements to ensure that all BEAD-funded networks will be able to provide broadband service to each serviceable location not later than four years after the award date. Furthermore, subgrantees' required buildout milestones ensure that all subgrant activities will conclude at least 120 days before the performance period ends. This policy provides sufficient time for final audits, compliance verification, and financial reconciliation.

BEA is committed to ensuring that all programmatic activities associated with the BEAD grant are completed within the designated period of performance. This includes:

- Finalizing all administrative and regulatory obligations under BEAD and federal guidelines.
- Conducting final programmatic assessments and submitting comprehensive performance reports to NTIA.
- Ensuring all financial reconciliations and project evaluations are completed before the funding expiration date.



By adhering to these measures, BEA guarantees that all BEAD-funded broadband projects remain on schedule, within budget, and compliant with federal and state guidelines.

## 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?

No. There is no direct hotline for reporting waste, fraud and abuse, however, the document at the link below outlines contact information for reporting waste, fraud or abuse to the Program Manager of the Office of Broadband Initiatives and to the Office of Inspector General of the United States Department of Commerce.

<https://www.nheconomy.com/office-of-broadband-initiatives/bead/reporting-fraud,-waste-abuse-office-of-broadband-i.pdf>

**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.

See Attachments at: [www.nheconomy.com/office-of-broadband-initiatives/bead](http://www.nheconomy.com/office-of-broadband-initiatives/bead)

**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.

Yes, New Hampshire certifies that subgrant agreements will include the conditions above at a minimum.

## Local Coordination (Requirement 5)

**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.

Adhering to the BEAD Restructuring Policy Notice, the New Hampshire Department of Business and Economic Affairs (BEA) conducted a public comment period for the BEAD Final Proposal that spanned 7 days, from August 26th, 2025, to September 2nd, 2025. This period satisfied the minimum seven-day requirement and ensured stakeholders had the opportunity to participate and submit feedback.

BEA made the Final Proposal publicly available on its official website (<https://www.nheconomy.com/office-of-broadband-initiatives/iija/bead>) and collected input through either the dedicated email address or the online comment form.

BEA received a total of 4 public comments.

Three of the comments recommended that New Hampshire reserve funds for potential future non-deployment uses, such as a program to improve broadband infrastructure in affordable housing multi-dwelling units (MDUs) or to remove barriers to adoption through education. BEA acknowledges these recommendations and will revisit once NTIA issues further guidance on the use of non-deployment funds, as discussed in Section 1.1.

One of these comments also noted that New Hampshire's preliminary allocations leave a significant amount of funding available to reach high-cost locations. This commenter felt that some locations served by LEO providers may not consistently meet the program's scalability standards.

Another commenter raised concerns about project costs, noting that satellite solutions appear less expensive than some terrestrial awards. As noted in Section 12.1, BEA thoroughly reviewed all applications in all project areas throughout the state and followed the BEAD Restructuring Policy Notice and legislative requirements for designating Priority Broadband Projects. BEA's procedures and designations in the Benefit of the Bargain round adhered to all federal requirements to deliver high-speed internet access efficiently on a technology-neutral basis.

In conclusion, the four public comments did not alter the content of the final proposal. BEA will continue to maximize the use of BEAD funds, explore new options if authorized, and ensure that program awards deliver both cost efficiency and lasting value for New Hampshire residents.

## Challenge Process Results (Requirement 6)

**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.

Yes, the BEAD challenge process has been successfully completed.

**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.

The publicly posted list of NTIA-approved final location classifications was posted on 12/04/24 and can be found at the following link.

<https://www.nheconomy.com/office-of-broadband-initiatives/bead/bead-challenge-process>



## Unserved and Underserved Locations (Requirement 7)

**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 in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2).

Yes, the State of New Hampshire will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2).

**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 unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.

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.

Not Applicable.

**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 in the NTIA-approved final list of eligible locations and required under 47 U.S.C. §1702(h)(2).

Yes, the State of New Hampshire will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. §1702(h)(2).

**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 unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.

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.

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 final list of eligible locations 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.

Yes, the provided reason codes have been utilized to investigate and account for locations that do not require BEAD funding.

**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

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Yes, all enforceable commitments have been accounted for.

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

**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.

The implementation status is In Progress for plans described in the approved Initial Proposal Requirement 14.

Section 2.10 of New Hampshire's Initial Proposal, Cost and Barrier Reduction, (Requirement 14) described BEA's ongoing outreach efforts to state agencies, local governments, providers, federal agencies, and other stakeholders regarding cost and barrier reduction. BEA remains willing to assist as needed with facilitating permit approvals at all levels, as illustrated in Section 2.10.

In addition, BEA provided permitting resources for applicants at its Subgrantee Selection page at <https://www.nheconomy.com/office-of-broadband-initiatives/bead/subgrantee-selection>. This link included information on NEPA compliance; assessing permitting needs; information from the NH Department of Transportation and a link to the state permitting portal; and NTIA's Permitting and Environmental Mapping Tool.

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

Yes, subgrantees were required to certify compliance with existing federal labor and employment laws.

**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.

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.

Yes, all subgrantees will be required to offer a low-cost broadband service option for the duration of

the 10-year Federal interest period.

**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 period, explain why the Eligible Entity was unable to do so.

Not applicable.

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

Yes, all subgrantees have planned for the reliability and resilience of BEAD-funded networks.

**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 planned for the reliability and resilience of BEAD-funded networks in their network designs, explain why the Eligible Entity was unable to do so.

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.

The New Hampshire BEA Office of Broadband Initiatives (BEA) adopted the June 6, 2025, BEAD Restructuring Policy Notice definition of a Priority Broadband Project: one that delivers broadband with download speeds of at least 100 Mbps, upload speeds of at least 20 Mbps, latency under 100 milliseconds, and the ability to easily scale for future connectivity needs, including 5G and successor technologies.<sup>1</sup> Broadband application projects that do not meet one or more of these standards are considered Non-Priority Projects.

The Policy Notice expressly instructs States to “assess the network application” and whether “the proposed network architecture for each specific project area meets this standard” based on the applicant’s documentation.<sup>2</sup> The State shall consider, on an application and project area specific basis, factors such as capacity constraints, physical limitations based on environmental factors, technology-specific concerns, and the applicant’s ability to meet scalability standards, including supporting the deployment of 5G, successor wireless technologies, and advanced services. For the application review process, the State used a methodical approach to evaluate applications on speed, latency, and ease of scalability, while carefully applying our on-the ground familiarity with project service areas in a way that empowered the BEAD program to support current and future needs of New Hampshire. The State carefully scrutinized all applications and their ability to meet the priority broadband project definition’s speed and latency performance standard and scalability requirement.

During the application round of NH’s BEAD subgrantee selection process, the State received applications deploying fiber, hybrid fiber-coax (HFC), and low earth orbit (LEO) technologies. Key factors were considered that critically impact where these technologies can be effectively deployed in a given project service area: physical limitations, scalability limitations, and customer density. These factors influence speeds, signal reliability, network capacity, and the ability of the network to continue to meet BEAD program standards throughout the entire period of performance and thus were important in determining on a project service area level if, when, and where these technologies should be considered a priority broadband project.

**PHYSICAL LIMITATIONS:** New Hampshire closely considered whether the locations in an application’s project service area may have geographic or environmental features that limit the proposed network’s ability to reliably meet the BEAD technical requirements and therefore the Priority Broadband Project definition. Given New Hampshire’s diverse topography and geography, history of severe weather, and areas of dense foliage and extensive tree canopy, this is a major concern for many project service areas in the state and is a critical factor in assessing whether certain

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<sup>1</sup> NTIA, Broadband Equity, Access, and Deployment (BEAD) Program: BEAD Restructuring Policy Notice (June 6, 2025), <https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf> (“Policy Notice”).

<sup>2</sup> Ibid



network architectures and technologies can deliver the required speeds and scalability to be deemed Priority Broadband Projects. The State determined that fiber and HFC networks are not impacted by the diverse topography, geography, weather, seasonal foliage, or extensive tree canopy.

LEO satellite systems require an unobstructed view of the sky, which is difficult to achieve in many parts of the state. New Hampshire's foliage and terrain vary widely and can significantly impact service reliability. For example, a LEO satellite provider notes that the technology requires an unobstructed 110-degree view of the sky, which would be extremely difficult to achieve in densely wooded, mountainous or urban areas.<sup>3</sup> Even minor obstructions like tree branches or rooftops can cause service disruptions.<sup>4</sup> Rain, snow, and fog further degrade performance.<sup>5</sup> New Hampshire is 82 percent forested land, the second most forested state in the country.<sup>6</sup> The State took these limitations seriously in determining priority broadband projects on a project service area basis.

New Hampshire developed a methodology for analyzing the impact of these physical limitations, particularly tree canopy, on BEAD eligible BSLs. To create the dataset used to analyze tree canopy cover over BEAD eligible BSLs, the State referenced a high-resolution Coastal Change Analysis Program (C-CAP) Landcover dataset which is based on 30-cm orthophotography (collected by planes, not satellites). All BEAD eligible BSLs were then overlaid with this C-CAP Landcover layer and each individual BSL was designated as either covered by tree canopy or not covered. The State then used this dataset to analyze the percentage of BSLs in a given project service area that would be likely to experience service disruptions of LEO technology if they were covered by the tree canopy. If a significant number of the BSLs in a project service area were indicated as covered by the tree canopy and therefore lacked an unobstructed 110-degree view of the sky, LEO applications were deemed to be non-priority for that project service area.

**SCALABILITY LIMITATIONS:** Scalability and the applicant's response to growing demand was a key factor analyzed by the State in determining whether an application would be designated a Priority Broadband Project for a specific project service area. Scalability was defined in terms of both demand and capacity, with a focus on technologies that can support both the current and future needs of residents and align with state-specific goals such as further developing New Hampshire's robust tourism and business development landscape. The State anticipates a significant annual increase in speed demand exceeding the 100/20 Mbps minimum benchmark over the next ten years. This projection is based on historical FCC broadband definitions and state-specific trends. To qualify as a Priority Broadband Project, technologies must demonstrate ease of scalability to meet projected demand for current and future users.

For applications deploying fiber, the State determined the fiber technology specified in the individual applications did not have scalability limitations.

For applications deploying HFC, the State determined the HFC technology does not have scalability

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<sup>3</sup> Starlink, <https://www.starlink.com/>

<sup>4</sup> Starlink, "Standard Setup Guide 3," [https://api.starlink.com/public-files/installation\\_guide\\_standard\\_kit.pdf](https://api.starlink.com/public-files/installation_guide_standard_kit.pdf).

<sup>5</sup> O.B. Osoro & D.S. Suki, "An Evaluation of Link Performance Based on Rainfall Attenuation for a LEO Communication Satellite Constellation Over Africa," <https://arxiv.org/pdf/2304.00126>.

<sup>6</sup> New Hampshire Division of Forests and Lands, "Forest Statistics," <https://www.nhdf.dnrc.nh.gov/forest-statistics>.

limitations where and when Data Over Cable Service Interface Specification (DOCSIS) 4 will be deployed. All HFC applications received by the State specified DOCSIS 4 would be deployed and therefore did not have scalability limitations.

For applications deploying LEO, the State found that a provider is currently applying \$100+ congestion charges in areas with “high demand” because its constellation cannot accommodate all of its U.S. users.<sup>7</sup> These limitations stem from constraints in the underlying network, the need to replace satellites every five years,<sup>8</sup> and limited backhaul—issues that also plague all LEO satellite providers—and likely would be exacerbated by such providers taking on additional subscribers through BEAD for the extended period of performance required under the Policy Notice.

**CUSTOMER DENSITY:** In analyzing the submitted project applications for fiber, HFC, and LEO, the State also considered the impact of customer density on whether the individual application could be considered a Priority Broadband Project for a given project service area. The State found applications submitted for specific project service areas deploying fiber or HFC technologies are not impacted by customer density and are easily scalable based on future developments.

Regarding LEO technology, the State found recent technical assessments to show that Starlink beams saturate at 6.66 households per square mile.<sup>9</sup> Beyond this threshold, the network struggles to deliver the BEAD minimum 100/20 Mbps service level. Since households’ bandwidth needs will continue to grow, New Hampshire strongly considered the capacity constraints of an applicant’s proposed network and, if applicable, how the applicant proposes to mitigate any such constraints throughout the BEAD period of performance and beyond. This was done in order to minimize the risk of subscribers to BEAD-funded networks experiencing service degradation or increased costs, particularly where an application’s BSLs are in close proximity to areas with existing subscribers or many other BEAD eligible locations.

In order to analyze capacity restrictions at a BSL level, the State mapped all BSLs that received an application from a LEO provider and drew a circle with a radius of 0.5 miles with the BSL at the center to approximate one square mile. The State then determined the number of other BSLs that fell within that radius and used this to determine if user density would cause a potential problem with LEO capacity to deliver speeds which meet BEAD requirements. If eight or more BSLs fell within the circle, then the BSL at the center was determined to be subject to LEO capacity concerns. If a significant number of BSLs within a project service area were determined to be those BSLs impacted by LEO capacity concerns, then LEO applications were deemed to be non-priority for that project service area.

In light of this analysis, the State determined several LEO applications to be non-priority based upon physical limitations, scalability concerns, customer density concerns, or a mixture of the three. These

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<sup>7</sup> Michael Kan, “SpaceX Increases Starlink Congestion Charge in Several US Cities,” PCMag (Apr. 22, 2025), <https://www.pcmag.com/news/spacex-increases-starlink-congestion-charge-in-several-us-cities>

<sup>8</sup> Joe Supan, “The Rise and Inevitable Downfall of 7,000 Starlink Satellites,” Broadband Breakfast (Feb. 19, 2025), <https://broadbandbreakfast.com/joe-supan-the-rise-and-inevitable-downfall-of-7-000-starlink-satellites/>, Michael Kan, SpaceX: Actually, “Dying Starlink Satellites Don’t Always Fully Burn Up,” PCMag (Feb. 27, 2025), <https://www.pcmag.com/news/spacex-actually-dying-starlink-satellites-dont-always-fully-burn-up>.

<sup>9</sup> Meinrath et al., “Starlink Capacity Analysis v0.2,” July 18, 2025.

project service areas shall be served by the priority broadband project applications received for them or proceed to negotiation with BEAD-qualified priority broadband project providers. If such applications do not include all of the BSLs in that PSA, then LEO technology will be sought to serve such remaining BSLs in that project service area as non-priority broadband projects.

## Subgrantee Selection Certification (Requirement 13)

13.1 Text Box: Provide a narrative summary of how the 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.

### Summary of How BEA Applied the “Minimal BEAD Program Outlay” Scoring Criteria

Adhering to the BEAD Restructuring Policy Notice, BEA determined the Priority and Non-Priority status of project applications. Following this designation, BEA applied the “Minimal BEAD Program Outlay” scoring criterion as the primary determinant in evaluating competitive applications. In accordance with BEA’s guidance, each application was assessed based on the total BEAD funding requested and the cost per passing for each Broadband Serviceable Location (BSL) within the proposed Project Service Area (PSA).

For each application, the total BEAD funding required was calculated by subtracting the applicant’s proposed matching funds from the total project cost. The cost per passing was then determined by dividing the BEAD funding required by the number of BSLs proposed to be served within the PSA. The Priority project with the lowest cost per passing was considered the leading proposal. In cases where the leading proposal excluded more than 80% of BSLs—or excluded fewer than 80% but still left out a significant number of locations with reasonable priority bids from another applicant—BEA determined that selecting it would create substantial overbuild and higher costs if the remaining BSLs were served separately. In these instances, BEA instead selected the competing proposal. Although not the lowest-cost option for the specific set of BSLs, this approach was deemed the most efficient because it minimized overbuild, avoided redundant infrastructure, and contributed to the lowest total Program cost across the combination of selected projects.

### Summary of How BEA Applied Secondary Criteria (as Applicable)

In cases where two or more proposals for a PSA had a project cost within 15% of the lowest-cost proposal received for that general project area on a per BSL basis, BEA applied the secondary scoring criteria outlined in Table 5 of the application guidance. In cases where the secondary scoring criteria produced a tie, BEA selected the project with the lowest cost per passing to ensure the most cost-efficient outcome. Each of the following criteria was assessed independently, and points were assigned accordingly:

- a. Speed to Deployment (Maximum: 15 points)

Points were assigned based on each applicant’s commitment to complete deployment and initiate service, measured from the official subgrant award date:

<b>Timeframe from Contract</b>	<b>Points Assigned</b>
< 1 year	15
≥ 1 year but < 2 years	12
≥ 2 years but < 3 years	9
≥ 3 years but < 4 years	6
= 4 years	3

b. Speed of Network and Other Technical Capabilities (Maximum: 35 points)

BEA evaluated each application based on the proposed broadband speed and latency. All proposals were required to meet or exceed the BEAD minimum threshold of 100 Mbps download/20 Mbps upload with a latency of ≤100 ms. Points were awarded as follows:

<b>Speed Upon Completion</b>	<b>Points Assigned</b>
≥ 100/100 Mbps	35
< 100/100 Mbps but ≥ 100/35 Mbps	20
< 100/35 Mbps but ≥ 100/20 Mbps	5

c. Treatment of Locations with Previously Identified or Provisional Subgrantees

When BEA re-opened the subgrantee application process to align with the new BEAD Restructuring Notice, none of the project applications previously submitted were considered for funding, effectively starting the entire application process over to ensure complete alignment with the BEAD Restructuring Notice.



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

### 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 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 chapter of the 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.

See Attachment at: [www.nheconomy.com/office-of-broadband-initiatives/bead](http://www.nheconomy.com/office-of-broadband-initiatives/bead)

## **Consent from Tribal Entities (Requirement 15)**

**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.

This requirement is not applicable to New Hampshire, there are no federally recognized tribal lands in New Hampshire.

## **Prohibition on Excluding Provider Types (Requirement 16)**

**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)?

Yes. New Hampshire certifies that no cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local government were excluded from eligibility for a BEAD subgrant.

## 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.’

Not Applicable.

**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.

Not Applicable.