

ConnectMT BEAD Program

BEAD Disbursement Process Guide

December 2025



Introduction

The Broadband Equity, Access, and Deployment Program (BEAD) was designed to expand high-speed internet access by funding planning, infrastructure deployment, and broadband adoption programs across the country. BEAD is administered by the National Telecommunications and Information Administration (NTIA). The State of Montana (MT) was allocated close to \$629 million in BEAD funding to connect all unserved and underserved locations in the state with reliable and affordable broadband. The ConnectMT Office is responsible for overseeing these BEAD funds.

The purpose of this BEAD Disbursement Process Guide is to outline ConnectMT's disbursement policy for deployment projects.

Overview of Montana's BEAD Disbursement Process

Montana's BEAD awards are fixed amount subawards, and costs incurred by subgrantees will be reimbursed in accordance with the milestone disbursement process and schedule outlined in this guide.¹ ConnectMT will implement a milestone disbursement process for BEAD, releasing funds to each subgrantee only after the successful and verified completion of the predefined project milestones. Subgrantees must submit disbursement requests through the AmpliFund portal.

Timelines

Subgrantees may submit a request for disbursement **upon the completion of a milestone**, as specified in the Grant Agreement.² Disbursement of grant funds is based on review and acceptance of documentation evidencing milestone completion and project performance as proposed in the project application. Additional project documentation may be requested to validate costs and progress against established milestones and to ensure compliance with federal, state, and programmatic requirements.

Subgrantees must also be in compliance with quarterly and annual post-award monitoring and reporting requirements to be eligible for disbursement of grant funds. Each report shall describe progress made for each broadband infrastructure project and/or other eligible activities carried out using the subgrant and the duration of the subgrant.

In accordance with program rules, subgrantees have four years from the date that the agreement with ConnectMT is fully executed to complete construction. The disbursement process described below is applicable to non-LEO (Low Earth Orbit) subgrantees. LEO subgrantees are subject to a separate disbursement schedule as outlined in Appendix C of this policy document.

Budget and Disbursement Milestones

Each subgrantee will have a milestone-based budget and disbursement schedule specific to their project, which will be submitted and approved as part of the first milestone.

1 https://broadbandusa.ntia.gov/sites/default/files/2024-06/Fixed_Amount_Subaward_One_pager_2.pdf

2 https://connectmt.mt.gov/_files/25-11-6-BEADGrantAgreement.pdf

There are five milestone categories that help differentiate components of the project, and each category corresponds to an allowable percentage of the BEAD award amount. These high-level categories and percentages are fixed for all non-LEO subgrantees.

- Project Plan – 5% of award amount
- Engineering & Permitting – 10% of award amount
- Pre-construction – 10% of award amount
- Construction – 65% of award amount
- Network Activation & Program Closeout – 10% of award amount

Included below in Table 1: Detailed Budget and Disbursement Milestones is a detailed budget and disbursement schedule based on percentage of project broadband serviceable locations (BSLs). The detailed table shows milestone categories broken down into smaller segments for detail that, if utilized, may facilitate more efficient cashflow for subgrantees.

TABLE 1: DETAILED BUDGET AND DISBURSEMENT MILESTONES

| Milestone Category | Milestone | Percentage of the Award Amount |
|--------------------------|--|--------------------------------|
| Project Plan | Aggregated project plan with milestones and budget. | 5% |
| Engineering & Permitting | Completed engineering drawings and executed permits for 20% of project BSLs. | 2% |
| | Completed engineering drawings and executed permits for 40% of project BSLs. | 2% |
| | Completed engineering drawings and executed permits for 60% of project BSLs. | 2% |
| | Completed engineering drawings and executed permits for 80% of project BSLs. | 2% |
| | Completed engineering drawings and executed permits for 100% of project BSLs. | 2% |
| Pre-construction | Documentation of binding agreements for all required contracted labor and materials. Evidence of construction staging and material delivery for 20% of project BSLs. | 2% |
| | Documentation of binding agreements for all required contracted labor and materials. Evidence of construction staging and material delivery for 40% of project BSLs. | 2% |
| | Documentation of binding agreements for all required contracted labor and materials. Evidence of construction staging and material delivery for 60% of project BSLs. | 2% |
| | Documentation of binding agreements for all required contracted labor and materials. Evidence of construction staging and material delivery for 80% of project BSLs. | 2% |

| | | |
|---------------------------------------|---|-----|
| | Documentation of binding agreements for all required contracted labor and materials. Evidence of construction staging and material delivery for 100% of project BSLs. | 2% |
| Construction | Completed placement of broadband infrastructure and associated as-built documentation for 20% of project BSLs. | 13% |
| | Completed placement of broadband infrastructure and associated as-built documentation for 40% of project BSLs. | 13% |
| | Completed placement of broadband infrastructure and associated as-built documentation for 60% of project BSLs. | 13% |
| | Completed placement of broadband infrastructure and associated as-built documentation for 80% of project BSLs. | 13% |
| | Completed placement of broadband infrastructure and associated as-built documentation for 100% of project BSLs. | 13% |
| Network Activation & Program Closeout | Completed network activation and submission of subscriber test data for 20% of project BSLs. | 2% |
| | Completed network activation and submission of subscriber test data for 40% of project BSLs. | 2% |
| | Completed network activation and submission of subscriber test data for 60% of project BSLs. | 2% |
| | Completed network activation and submission of subscriber test data for 80% of project BSLs. | 2% |
| | Completed network activation and submission of subscriber test data for 100% of project BSLs. Completion of all program closeout requirements. | 2% |

Project Phasing and Disbursement

Subgrantees may opt to segment their individual projects into phases in cases where portions of the project move through multiple milestones asynchronously. Subgrantees can design these phases in the most optimal configuration to meet the milestone requirements; understanding that the disbursement metrics are based solely on BSL percentage, not specific costs.

When developing project phasing, the subgrantee could account for the following considerations:

- Encompasses a minimum number of BSLs to meet the disbursement thresholds of 20%, 40%, 60%, 80%, and 100%. *(For example, a phase that includes 36% of project BSLs is only eligible for 20% disbursement; however, a phase that includes 41% of project BSLs is eligible for 40% disbursement).*
- Segmenting areas that will require long lead time to complete permitting, construction, or network activation due to factors such as environmental requirements, permitting authority agreements, etc.

- Alignment with the subgrantee's internal project phasing which considers cash flow, contractor payments, build seasons, etc.

Any proposed project phasing shall be identified and communicated to ConnectMT during the Grant Agreement process and shall be finalized prior to disbursement of the Project Plan milestone. The proposed phases shall be consistent (i.e. include the same BSLs, permitting requirements, and proposed infrastructure) for all milestones.

Example of Project Milestones without Phasing

Consider an example of Project A without phasing. Project A has a total project cost of \$10M, a BEAD grant amount of \$7.5M, and a match amount of \$2.5M. The milestone categories and associated award amounts would be:

TABLE 2: EXAMPLE PROJECT A MILESTONE CATEGORY BREAKDOWN

| Milestone category | Percentage of the award amount | Award amount | Anticipated Project Month Disbursement |
|---------------------------------------|---------------------------------------|---------------------|---|
| Project Plan | 5% | \$375,000 | 3 |
| Engineering & Permitting | 10% | \$750,000 | 12 |
| Pre-construction | 10% | \$750,000 | 18 |
| Construction | 65% | \$4,875,000 | 35 |
| Network Activation & Program Closeout | 10% | \$750,000 | 40 |

In this example, the subgrantee must complete the entire Construction Milestone, in month 35 of their project, to receive the \$4,875,000 award amount. This timeframe may not accurately reflect project cost flow because disbursement is based on the milestone not actual costs the project.

Example of Project Milestones with Phasing

Consider the same example of Project A with a total project cost of \$10M, BEAD grant amount of \$7.5M, and match amount of \$2.5M.

However, in this example, the subgrantee has elected to break the project into three separate phases to allow their contracted resources to design and construct the bulk of the project across two build seasons, and for a third segment of the network, requiring extensive permitting, to be constructed in a third build season.

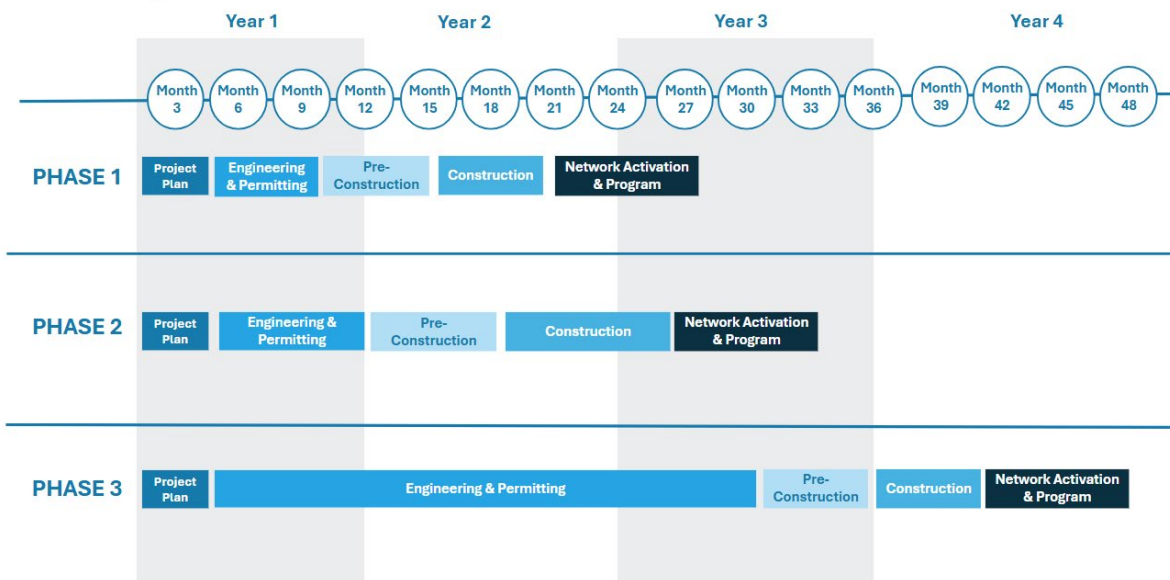
The subgrantee has considered their internal project planning requirements and has structured the phases to accommodate the timing of actual project expenditures to ensure proper cash flow over the course of the project.

- Phase 1 will be 42% of BSLs;
- Phase 2 will be 85% of BSLs (43% to 85%);
- Phase 3 will be the final portion of BSLs up to 100%.

The milestone categories and associated award amounts are shown in Table 3 below:

TABLE 3: EXAMPLE PROJECT A MILESTONE DISBURSEMENT BREAKDOWN BY AWARD AMOUNTS

| Milestone category | Phase | Milestone | Award amount |
|---------------------------------------|--------------|---|---------------------|
| Project Plan | All | Aggregated project plan with milestones and budget. | \$375,000 |
| Engineering & Permitting | 1 | Completed engineering drawings and executed permits for 42% of project BSLs. | \$300,000 |
| | 2 | Completed engineering drawings and executed permits for 85% of project BSLs. | \$300,000 |
| | 3 | Completed engineering drawings and executed permits for 100% of project BSLs. | \$150,000 |
| Pre-construction | 1 | Documentation of binding agreements for all required contracted labor and materials. Evidence of construction staging and material delivery for 42% of project BSLs. | \$300,000 |
| | 2 | Documentation of binding agreements for all required contracted labor and materials. Evidence of construction staging and material delivery for 85% of project BSLs. | \$300,000 |
| | 3 | Documentation of binding agreements for all required contracted labor and materials. Evidence of construction staging and material delivery for 100% of project BSLs. | \$150,000 |
| Construction | 1 | Completed placement of broadband infrastructure and associated as-built documentation for 42% of project BSL. | \$1,950,000 |
| | 2 | Completed placement of broadband infrastructure and associated as-built documentation for 85% of project BSL. | \$1,950,000 |
| | 3 | Completed placement of broadband infrastructure and associated as-built documentation for 100% of project BSL. | \$975,000 |
| Network Activation & Program Closeout | 1 | Completed network activation and submission of subscriber test data for 42% of project BSLs. | \$300,000 |
| | 2 | Completed network activation and submission of subscriber test data for 85% of project BSLs. | \$300,000 |
| | 3 | Completed network activation and submission of subscriber test data for 100% of project BSLs. Completion of all program closeout requirements. | \$150,000 |

FIGURE 1: EXAMPLE PROJECT A MILESTONE DISBURSEMENT BREAKDOWN BY YEAR**Example Project A**

In this example with phasing, the subgrantee can begin to receive disbursements from ConnectMT as soon as they complete milestones for specific phases, as opposed to needing to complete the entire milestone to receive the disbursement.

Required Documentation

ConnectMT does not require each subgrantee to submit documentation for each cost incurred as part of its disbursement requests. However, subgrantees must maintain full records of all costs incurred and be able to produce them for monitoring and audit purposes, as required by NTIA and ConnectMT. Subgrantees shall create and retain all records, including all receipts, disbursements, and other transactions, for a period of seven years from the date ConnectMT notifies the subgrantee that the final required BEAD report has been submitted.

As such, the ConnectMT Office has developed a framework for the project's technical documentation to be provided with disbursement requests, but ConnectMT may request additional evidence to support requests on an ad hoc basis at any time. This framework can be found in Appendix A: Required Documentation Matrix, and the required contents of the technical documentation can be found in Appendix B: Required Documentation Guidance.

Review Process

ConnectMT will review each disbursement request to ensure milestones have been met. Depending on the requested evidence, ConnectMT may also validate that costs are allowable according to the statutory and regulatory provisions of the BEAD program guidance as outlined by NTIA and the State of Montana. ConnectMT will verify that:

- Required documentation substantiates completion of the milestone per the budget table included in the Grant Agreement (see Table 1 above for example);
- The costs comply with program requirements, if appropriate;
- The request is for eligible costs as per the Project Budget and Timeline, Exhibit B in the subgrantee's Grant Agreement, if appropriate;
- The claim is adequately supported by the subgrantee's records, if appropriate; and
- The subgrantee has paid the costs, if appropriate

Eligible match amounts will be validated as part of regular monitoring; however, as appropriate documentation regarding match may be requested as part of milestone validation (i.e. in-kind self-funded labor).

ConnectMT will reimburse subgrantees within **30 business days** of validating a complete and correct disbursement request submission. Subgrantees will be notified when ConnectMT has validated the submission. The **30 business day** window for ConnectMT to process disbursements will only begin upon validation of complete and correct materials.

Disbursement processing delays may occur due to missing or incorrect supporting documentation. If ConnectMT or its contractors request additional information, the subgrantee will have **10 business days** to submit the information. Any delay in submission of requested information may further delay disbursement or initiate additional monitoring actions, if necessary.

Processing Time and Submission Dependencies

Milestones are sequential within each phase of the project and will be reviewed accordingly.

- The Project Plan milestone disbursement must be completed before ConnectMT will begin reviewing disbursement materials submitted for the Engineering & Permitting milestone. Even if the subgrantee submits disbursement documentation for a phase of the Engineering & Permitting milestone at the same time as the Project Plan milestone, the process for reviewing Engineering & Permitting materials does not start until after the Project Plan disbursement is processed.
- Initiation of construction prior to Environmental and Historic Preservation (EHP) approval is prohibited under BEAD Program rules. Thus, initiation of construction prior to ConnectMT approval of corresponding Engineering & Permitting or Pre-Construction materials is done so at the subgrantee's own risk.
- For the Network Activation & Program Closeout milestone:
 - ConnectMT reserves the right to require subgrantees to coordinate with ConnectMT to schedule and conduct field inspection surveys.
 - A completed field inspection survey shall be required prior to approval of the final Network Activation and Report Closeout disbursement request submission.

Match Requirements and Disbursements

ConnectMT will disburse award amounts based on the grant amount, not the total project cost. The subgrantee required quarterly reports will capture detailed information on the subgrantee's actual expenditures, and match contributions. Through regular reporting and documentation submitted

by the subgrantee, ConnectMT will monitor subgrantees' match expenditures to ensure that they will remain in proportion to their proposed budget, milestone disbursement schedule, and construction timeline. If any match amount has been expended to meet a project milestone, ConnectMT will request from subrecipients documentation to substantiate these match expenditures.³

Payments made for costs determined to be unallowable by either ConnectMT or NTIA, will be subject to recoupment of funds previously disbursed (grant funding clawbacks) in accordance with the subgrantee monitoring and management requirements identified in 2 C.F.R. Part 200 Subpart D and BEAD NOFO IV.C.1.b.






Funding Clawbacks

The ConnectMT Office, will seek to recapture any awarded grant funds through a recoupment process based on a subgrantee's failure to comply with the provisions of the Subgrantee Award Agreement, including improper expenditures identified in submitted audits, financial reports, or invoices reviewed during site visits or costs deemed as not reasonable, due to errors, omissions, misrepresentations, or false statements. Other justifications include unsatisfactory progress toward project milestones and deadlines and required subgrant activities not carried out such as network deployment or upgrades, connecting BSLs, delivering service at BEAD-qualifying speeds, and other required program activities.

³ https://broadbandusa.ntia.gov/sites/default/files/2024-05/BEAD_Match_Primer.pdf

Appendix A: Required Documentation Matrix

The matrix outlines the required documentation to be submitted upon Award and with each milestone disbursement request.

| Required Documentation | Milestone | | | | |
|---|---|---|---|---|--|
| | Project Plan  | Engineering & Permitting  | Pre-Construction  | Construction  | Network Activation & Program Closeout  |
| Location List | X | | | | X |
| Environmental Checklist | X | | | | |
| Project Timeline | X | | | | |
| Project Route File | X | X | | X | X |
| Detailed Design Drawings | | X | | | |
| Permit Status Summary | X | X | | | |
| Evidence of Approved Permits | | X | | | |
| Bill of Materials | | X | X | X | |
| Executed Contract(s) for Construction Labor | | | X | | |
| Executed Contract(s) for Construction Materials | | | X | | |
| Evidence of Staging and Material Delivery | | | X | | |
| Evidence of Environmental Approval | | | X | | |
| Active Subscriber Test Results | | | | | X |
| Fixed Wireless Design (<i>wireless projects only</i>) to be developed | | X | | X | X |
| Acceptance Testing (<i>wireless projects only</i>) to be developed | | | | X | |

Appendix B: Required Documentation Guidance

Location List

The Location List identifies the Broadband Serviceable Locations (BSLs) and Community Anchor Institutions (CAI) for which the Subgrantee has made a federally enforceable commitment to serve part of the ConnectMT BEAD Program. Additionally, it serves to track the Subgrantee's completion of this service commitment throughout the life of the program.

TEMPLATE: The Location List must be submitted using the template provided by ConnectMT at time of project award. Subgrantees can follow the template instructions to complete the appropriate template fields. [[Link](#)]

A location list must be submitted for the following milestone(s):

Project Plan

As part of the Project Plan Milestone submission, the Location List must be updated by the Subgrantee to include any proposed project phasing, if applicable. As required, the Subgrantee will numerically identify which project phase each location is associated with. The assigned phasing of BSLs and CAIs must align with the proposed phasing identified within the Subgrantee's **Project Route File** submission required as part of the Project Plan Milestone.



Network Activation & Program Closeout

As part of the Project Plan Milestone submission, the Location List must be updated by the Subgrantee to indicate which locations are either connected or able to receive service within 10 business days of a reasonable request for service.⁴ Additionally, the Subgrantee will identify the maximum download and upload speeds offered for each indicated location.



⁴ <https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf>

Environmental Checklist

Completion of the Environmental Checklist demonstrates that the Subgrantee is aware of the EHP requirements of the BEAD program and has adequately identified the impact of these requirements on their project.

The environmental checklist must be submitted for the following milestone(s):

Project Plan

The Environmental Checklist must be submitted in the template provided by ConnectMT: [\[Link\]](#)



NOTE: The Subgrantee may not initiate any deployment or ground-disturbing construction activities until the EHP process has been concluded and approved by NTIA.

Project Timeline

The Project Timeline submission demonstrates that the subgrantee has an adequate project plan to complete the network deployment work within the program timeline.

TEMPLATE: The Project Timeline must be submitted in the template provided by ConnectMT: [\[Link\]](#)

A project timeline must be submitted for the following milestone(s):

Project Plan

The subgrantee must continue to maintain the Project Timeline until grant closeout and shall submit an updated Project Timeline each quarter or at intervals specified by ConnectMT. ConnectMT reserves the right to request the submission of an updated Project Timeline at any time.



Any changes to the subgrantee's Project Timeline must be submitted to and approved by the ConnectMT office through a formal change order request form in AmpliFund.

As part of the Project Plan Milestone submission, the Project Timeline must include any proposed project phasing and updates to the anticipated start dates and end dates for the following project components for each individual project phase:

- Project Planning
- NEPA/EHP Permitting
- Design Engineering
- Permitting (non-environmental)
- Material Acquisition
- Network Construction
- Network Activation
- Project Closeout

The Project Timeline should also include the dates on which the subgrantee expects to submit for disbursement for each program milestone.

ConnectMT reserves the right to request additional documentation as required to validate the subgrantee's project plan.

Project Route File

The Project Route File submission should demonstrate that the proposed infrastructure, service area, materials, and technology match those approved in the Grant Agreement and confirm that the infrastructure is capable of consistently delivering the minimum proposed speeds to all proposed locations.

This submission must be in shapefile format. A shapefile is a common geospatial vector data format used to store and represent geographic features—such as points, lines, and polygons—along with associated attribute information. Each shapefile consists of six separate file extensions (.CPG, .DBF, .PRJ, .SBN, .SPX, and .SHP), all of which must be included. Shapefiles must be submitted in a single zipped folder containing all six components.

A project route file must be submitted for the following milestone(s):

Project Plan

As part of the Project Plan Milestone submission, a project route file must be submitted with the following details included:



- All infrastructure proposed as part of the approved grant project, including but not limited to all wireline routes and towers as applicable. Each type of infrastructure must be represented with the appropriate feature type (points or lines). The infrastructure must be attributed to delineate between new and existing infrastructure (e.g. existing wirelines submitted as an in-kind match should be identified as existing infrastructure).
- Broadband Serviceable Locations (BSL) must be submitted as point features and shall match the locations identified in the subgrantee's Grant Agreement.
- Any detailed project phasing that is proposed by the subgrantee shall be submitted as polygon features. Each polygon must encompass all proposed locations and infrastructure routes included in that project phase. The identified phases shall match those indicated in the project Gantt chart submission for the Project Plan milestone.

Engineering & Permitting

As part of the Engineering and Permitting Milestone submission, an updated project route file must be submitted to reflect design updates that have occurred during detailed design engineering. As with previous submissions, the infrastructure should be attributed to delineating between new and existing infrastructure.



This project route file must align with the subgrantee's **Detailed Design Drawings** and **Bill of Materials** submissions required as part of the Engineering & Permitting Milestone. The project route file must include the following:

- All underground infrastructure proposed as part of the approved grant project, including but not limited to conduit, vaults, pedestals, and cabinets. Each type of infrastructure must be represented with the appropriate feature type (points or lines) and associated attribute information as specified in the requirements below.

- Conduit must be represented as a line feature. Attributes must include conduit size and quantity. A single line may represent multiple conduits installed along the same path. This layer must be titled “conduit.”
- Vaults must be represented as point features. Points must be placed at the exact coordinates representing the precise installed location. Attributes must include vault dimensions. This layer must be titled “vaults.”
- Pedestals must be represented as point features. Points must be placed at the exact coordinates representing the precise installed location. Attributes must include the pedestal model number. This layer must be titled “pedestals.”
- Cabinets must be represented as point features. Points must be placed at the exact coordinates representing the precise installed location. Attributes must include the cabinet make, model, and fiber capacity, listed as separate attributes. This layer must be titled “cabinets.”
- All aerial infrastructure proposed as part of the approved grant project must be included, including poles and attachment points. Each feature must be represented appropriately and include the required attributes as outlined below.
 - Aerial support structures must be represented as point features. Points must be placed at the exact coordinates representing the precise installed location. Attributes must include infrastructure support type (all dielectric self-supporting (ADSS) or lashed to strand). This layer must be titled “support_structures.”
- All fiber cable and associated infrastructure proposed as part of the approved grant project must be included. Each element must be represented with the appropriate feature type (points or lines) and include the required attributes.
 - Fiber must be represented as line features. Areas where fiber cables run parallel to one another must be shown as separate lines. Attributes must include the cable manufacturer and fiber count. This layer must be titled “fiber_cable.”
 - Network access points, splice points, and slack storage locations must each be represented as separate point features.
 - A network access point is any location along the fiber infrastructure that facilitates spliced or pre-connectorized connections to the network, such as taps or dedicated splice enclosures.
 - Splice points must represent all splice closures necessary to complete the fiber network, excluding network access points.
 - The layers must be titled “network_access_points,” “splice_points,” and “slack_storage,” respectively.
- All Tower locations proposed as part of the approved grant project must be included. Towers must be represented as point features. The layers must be titled “tower_locations,”
- Broadband Serviceable Locations (BSLs) must be submitted as point features and shall match the locations identified in the subgrantee’s Grant Agreement.

- Any detailed project phasing that is proposed by the subgrantee shall be submitted as polygon features. Each polygon must encompass all proposed locations and infrastructure routes included in that project phase. The identified phases shall match those indicated in the Project Plan Milestone, any deviation from the proposed phases requires prior approval from ConnectMT.

Construction Milestone

As part of the Construction Milestone submission, an updated project route file must be submitted to reflect the final placement of infrastructure that has occurred during deployment of the network (*inclusive of all infrastructure with the exception of splice enclosures, splicing, and customer drops*). This submission represents the subgrantee's "As-Built documentation." This submission will be used by ConnectMT to conduct field verification. As with previous submissions, the infrastructure should be attributed to delineating between new and existing infrastructure.



This project route file must align with the subgrantee's **Bill of Materials** submission required as part of the Construction Milestone. The project route file shall include the following:

- All underground infrastructure placed as part of the approved grant project, including but not limited to conduit, vaults, pedestals, and cabinets. Each type of infrastructure must be represented with the appropriate feature type (points or lines) and associated attribute information as specified in the requirements below.
 - Conduit must be represented as a line feature. Attributes must include conduit size and quantity. A single line may represent multiple conduits installed along the same path. This layer must be titled "conduit."
 - Vaults must be represented as point features. Points must be placed at the exact coordinates representing the precise installed location. Attributes must include vault dimensions. This layer must be titled "vaults."
 - Pedestals must be represented as point features. Points must be placed at the exact coordinates representing the precise installed location. Attributes must include the pedestal model number. This layer must be titled "pedestals."
 - Cabinets must be represented as point features. Points must be placed at the exact coordinates representing the precise installed location. Attributes must include the cabinet make, model, and fiber capacity, listed as separate attributes. This layer must be titled "cabinets."
- All aerial infrastructure placed as part of the approved grant project must be included, including poles and attachment points. Each feature must be represented appropriately and include the required attributes as outlined below.
 - Aerial support structures must be represented as point features. Points must be placed at the exact coordinates representing the precise installed location. Attributes must include infrastructure support type (all dielectric self-supporting (ADSS) or lashed to strand). This layer must be titled "support_structures."

- All fiber cable and associated infrastructure placed as part of the approved grant project must be included. Each element must be represented with the appropriate feature type (points or lines) and include the required attributes.
 - Fiber must be represented as line features. Areas where fiber cables run parallel to one another must be shown as separate lines. Attributes must include the cable manufacturer and fiber count. This layer must be titled “fiber_cable.”
 - Network access points, splice points, and slack storage locations must each be represented as separate point features. *(This item is not required to be completed as part of the construction milestone submission, but must be then included as part of the Network Activation and Program Closeout milestone submission)*
 - A network access point is any location along the fiber infrastructure that facilitates spliced or pre-connectorized connections to the network, such as taps or dedicated splice enclosures.
 - Splice points must represent all splice closures necessary to complete the fiber network, excluding network access points.
 - The layers must be titled “network_access_points,” “splice_points,” and “slack_storage,” respectively.
- All Tower locations constructed (or attached to) as part of the approved grant project must be included. Towers must be represented as point features. The layers must be titled “tower_locations,”
- Broadband Serviceable Locations (BSL) must be submitted as point features and shall match the locations identified in the subgrantee’s Grant Agreement.
- Any detailed project phasing that is proposed by the subgrantee shall be submitted as polygon features. Each polygon must encompass all proposed locations and infrastructure routes included in that project phase. The identified phases shall match those indicated in the previous milestones, any deviation from the proposed phases requires prior approval from ConnectMT.

Network Activation & Program Closeout

As part of the Network Activation & Program Closeout Milestone submission, an updated project route file must be submitted to reflect the completion of required network splicing and any final placement of subscriber drop infrastructure not previously provided as part of the Construction Milestone. This submission represents the subgrantee’s “final as-built documentation”. This submission must include the same details as required by the Construction Milestone and represents an incremental addition to that submission.



ConnectMT reserves the right to request additional information to be included in this submission should the nature of the project require additional details to be submitted.

Detailed Design Drawings

The Detailed Design Drawings submission demonstrates that the proposed infrastructure, service area, equipment, and technology match those approved in the subaward agreement, confirming that the infrastructure is capable of consistently delivering the minimum proposed speeds to all proposed project locations. The detailed plans are proof that the subgrantee has completed the required engineering work needed to permit and construct the network as proposed.

Detailed design drawings must be submitted for the following milestone(s):

Engineering & Permitting

This submission should be in the native format that the subgrantee's staff or designated contractor will use to deploy the network (e.g., .PDF, Fiber Management Software data extension). Additionally, if any portion of the deployment requires the design information to be submitted in a specific format for a permitting authority to grant executed permits, the Detailed Design Drawings should be submitted in the format that complies with that permitting authority's requirements.



The detailed design drawings submission must align with the subgrantee's submitted **Project Route File** and possess the required detail to permit and construct the proposed network deployment. The submission shall include but not be limited to the following:

- Conduit
- Vaults
- Pedestals
- Cabinets
- Aerial support structures
- Fiber cable
- Network access points
- Splice enclosures
- Slack storage
- Broadband Serviceable Locations (BSL)
- Community Anchor Institutions (CAI)
- Wireless network equipment locations and schematics

ConnectMT reserves the right to request additional documentation to validate that the detailed engineering plans are construction ready and will be used during the deployment of the network.

Permitting Status Summary

The Permitting Status Summary demonstrates that the subgrantee has adequately identified and is prepared to execute all required permits needed for network deployment and that they will be able to meet their program obligations within the dates specified in their Grant Agreement.

TEMPLATE: The permitting status summary must be submitted in the template provided by ConnectMT: [\[Link\]](#)

Using the provided template, the subgrantee must list all known permits required for the complete network deployment to serve all obligated Broadband Serviceable Locations (BSL) and Community Anchor Institutions (CAI). Permit types could include but are not limited to the rights-of-way, environmental, special crossings, private easements, franchise agreements, and federal permits.

The permitting status summary must be submitted for the following milestone(s):

Project Plan

As part of the Project Plan Milestone submission, the subgrantee must fill out the template listing all anticipated permits required to complete the proposed project.

For each permit listed, the Subgrantee must indicate the project phase, permit name, permitting authority, and anticipated permit execution date. The execution dates identified in the summary must align with dates identified in the **Project Timeline** submission a part of the project plan milestone. If additional permits are identified as required by the subgrantee the permitting status summary shall be updated and resubmitted to ConnectMT.



Engineering & Permitting

As part of the Engineering and Permitting Milestone submission, an updated permitting status summary must be provided to show the actual executed permit date and permit expiration date.

ConnectMT reserves the right to request additional information as part of this submission as required to validate the documentation.



Evidence of Approved Permits

The evidence of approved permits must be submitted for the following milestone(s):

Engineering & Permitting

As part of the Engineering and Permitting Milestone submission, the Subgrantee must also provide copies of the executed permit approvals (signed by the permitting authority) for all permits indicated in the **Permitting Status Summary** submission a part of the Engineering and Permitting Milestone (excluding NEPA & EHP).



The Subgrantee shall upload these documents as separate attachments.

ConnectMT reserves the right to request additional information as part of this submission as required to validate the documentation.

BOM (Bill of Materials)

The BOM (Bill of Materials) submission demonstrates that the subgrantee has adequately identified the appropriate material types and quantities needed to deploy the proposed network. The subgrantee will later provide and update the BOM during each pre-construction milestone and each construction milestone for which they seek disbursement. Following forthcoming NTIA guidance, there may be additional requirements for BABA documentation.

Project materials include but are not limited to:

- Fiber Cable
- Fiber Cabinet Splice Cases
- Pedestals
- Lashing Wire
- Conduit
- Optical Network Terminals
- Shelves
- Fiber Optic Network Cards
- Redundant Fiber Cables
- Patch Panels
- Fiber Entrance Cabinet
- Fiber Entrance Cabinet Splice Cases
- Patch Panel Fiber Jumpers
- Splice Closures
- Drop Taps
- Fiber Markers
- Passive Optical Network Receiver
- Adapters

TEMPLATE: The BOM must be submitted using the template provided by ConnectMT: [\[Link\]](#)

The bill of materials must be submitted for the following milestone(s):

Engineering & Permitting

As part of the Engineering and Permitting Milestone submission, the subgrantee shall populate the template with all anticipated materials and quantities required to complete the project. The listed materials shall match those submitted during the Pre-construction Milestone submission and placed as part of the Construction Milestone submissions. During the life of the project, if deviations to the materials list occur, the subgrantee must notify ConnectMT to indicate the changes and provide an updated BOM.



The material quantities submitted during this milestone should align with the documentation provided in the submitted **Project Route File** and **Detailed Design Drawings**.

Pre-construction

As part of the pre-construction Milestone submission, the subgrantee shall update the template to indicate the quantities of materials that have been ordered and delivered to the subgrantee's designated facility(s).



Additionally, as part of this Milestone submission, the subgrantee must also provide evidence of the material delivery (e.g., receipts, packing slips) as separate attachments. The evidence must be dated and match the dates indicated in the BOM template.

Construction

As part of the Construction Milestone submission, subgrantee must provide an updated BOM to indicate the quantities of materials that have been deployed as part of the network construction. The materials quantities indicated as deployed should align with the **Project Route File** submitted as part of the Construction Milestone submission.



ConnectMT reserves the right to request additional documentation as required to validate the Bill of Materials submission.

DRAFT

Executed Contract(s) for Construction Labor

The executed contract(s) for construction labor must be submitted for the following milestone(s):

Pre-construction

As part of the pre-construction milestone submission, the subgrantee must provide evidence of construction mobilization, material acquisition, and project staging.



The subgrantee can provide evidence of construction mobilization by submitting executed copy(s) of construction labor contract(s), identifying sufficient contracted resources to construct the entirety of the network contained within the project phase(s) for which milestone disbursement is sought.

For Subgrantee's who will utilize internal resources to "self-perform" the construction work must provide the following:

- A detailed list of personnel assigned to the project identifying the name, job title, and estimated hours assigned to the project
- A detailed list of equipment that will be used on the project (e.g., bucket trucks, boring machines, splice machines). Subgrantee shall identify the make and model of the equipment as well as if the equipment is owned or will be leased to support the project's network construction

The Subgrantee shall upload these documents as separate attachments.

ConnectMT reserves the right to request additional information as part of this submission as required to validate the documentation.

Executed Contract(s) for Construction Materials

The executed contract(s) for construction materials must be submitted for the following milestone(s):

Pre-construction

As part of the pre-construction milestone submission, the subgrantee must provide evidence of construction mobilization, material acquisition, and project staging.



The Subgrantee can provide evidence of material acquisition by submitting executed copy(s) of material supply contract(s), identifying the required materials and quantities sufficient to construct the entirety of the network contained within the project phase(s) for which milestone disbursement is sought. The materials quantities identified in the contract should align with the **BOM** submitted as part of the Pre-construction Milestone submission.

For Subgrantee's who will utilize an existing stock of materials, work must provide the following:

A detailed list of project materials that will be used on the project, quantities identified in the contract should align with the **BOM** submitted as part of the Pre-construction Milestone submission. The detailed list shall identify from which internal facility (e.g., warehouse, material yard) the materials will be obtained from, the Subgrantee shall indicate the facility(s) name, address and latitude and longitude.

The Subgrantee shall upload these documents as separate attachments.

ConnectMT reserves the right to request additional information as part of this submission as required to validate the documentation.

Evidence of Staging and Material Delivery

The evidence of staging and material delivery must be submitted for the following milestone(s):

Pre-construction

As part of the pre-construction milestone submission, the Subgrantee must provide evidence of construction mobilization, material acquisition, and project staging.

The Subgrantee can provide evidence of project staging submitting the following documentation:



- Identifying the staging location(s) for entirety of the network contained within the project phase(s) for which milestone disbursement is sought. The identification information should include the facility's physical address, latitude and longitude, and photographs of the location identifying proper security measures and adequate space to stage network construction.
- Evidence of material delivery to the identified staging location(s) can be provided by submitting material receipts or packing slips for the delivered material, additionally photographs of the material being stored at the staging location can be submitted as evidence. The evidence should align with the quantities identified in the **BOM** submitted as part of the Pre-construction Milestone submission.

The Subgrantee shall upload these documents as separate attachments.

ConnectMT reserves the right to request additional information as part of this submission as required to validate the documentation.

Evidence of Environmental Approval

The evidence of environmental approval must be submitted for the following milestone(s):

Pre-construction

As part of the pre-construction milestone, the Subgrantee must also provide written documentation from NTIA confirming that the project's EHP process has been concluded and approved. Please note that additional NTIA guidance may change the documentation required as part of this submission.



ConnectMT reserves the right to request additional information as part of this submission as required to validate the documentation.

NOTE: The EHP process encompasses the entirety of the project scope, irrespective of Subgrantee phasing. The Subgrantee may not initiate any deployment or ground-disturbing construction activities on any project phase until the EHP process has been concluded and approved by NTIA.

Active Subscriber Test Results

The Active Subscriber Test Results submission demonstrates that the subgrantee has completed the deployment of a functioning network that can provide service that meets or exceeds the program performance requirements. The required testing is consistent with well-established Federal Communications Commission (FCC) practices and designed to minimize the administrative burdens on subgrantees.

TEMPLATE: Active subscriber test data must be submitted using the template provided by ConnectMT: [\[Link\]](#)

The active subscriber test results must be submitted for the following milestone(s):

Network Activation & Program Closeout

Subgrantees will conduct performance testing and submit test results to ConnectMT according to the following process:



- Prior to submission the subgrantee will provide a full list of currently connected **active subscribers** in the project area. The list will include each BSL's FCC ID. The subgrantee will also identify the service offering speeds for each location.
- ConnectMT will select locations within the subgrantee's project area for performance testing. ConnectMT will identify a minimum of ten (10) locations within the project area where the subgrantee has confirmed **active subscribers**.
- The subgrantee will conduct speed and latency tests for each location selected by ConnectMT.
- Tests will be conducted, at a minimum, once per hour from 6:00 PM to 12:00 AM, for a minimum total of six tests per location.
- Tests will be conducted to the premises of the selected **active subscribers** from a remote test server located at, or reached by passing through, an FCC-designated Internet exchange point (IXP), which is any building, facility, or location housing a public Internet gateway that has an active interface to a qualifying Internet Autonomous System (ASN).⁵
- Test results must conform to the following Performance Testing Specifications:
 - At least 80% of the speed test results must be at a minimum of 80% of the speed tiers committed to in the Grant Agreement for download and upload.
 - At least 95% of latency measurements must be at or below 100 milliseconds round-trip time.
 - If none of the locations selected by ConnectMT subscribes to a top-tier speed offering, the subgrantee will include testing at a location that does subscribe to a top-tier speed

⁵ More information about acceptable test paths and remote server locations is available at <https://www.usac.org/wp-content/uploads/high-cost/documents/Tools/PMM-Test-Paths-and-Remote-Server-Locations-1.pdf>. Qualifying ASNs are listed in Appendix B of *Connect America Fund*, WC Docket No. 10-19, Order on Reconsideration, 34 FCC Rcd 10109 (2019), which can be found at <https://docs.fcc.gov/public/attachments/FCC-19-104A1.pdf>.

offering. If there are no locations within the project area that subscribe to the top-tier service offering, the subgrantee will upgrade one of the locations selected by ConnectMT temporarily to allow for testing at the top-tier speed.

DRAFT

Appendix C: LEO Disbursement Process

Disbursement Installments

Fifty percent (50%) of the funds awarded through the BEAD subgrantee selection process will be advanced to the LEO subgrantee upon certifying that service is available to each location in the project area. The remaining fifty percent (50%) of BEAD grant funding shall be distributed in equal disbursements over the subsequent ten (10) year Agreement Performance Period.

These installment disbursements shall be made by ConnectMT the end of each quarter, following the submission of the LEO Quarterly Report. Disbursement to LEO subgrantees is contingent upon receipt and approval of the LEO Quarterly Report.

| Milestone | Description | Percentage of Award |
|-----------|---|---------------------|
| 1 | Initial disbursement upon certification that service is available to each location in the project area. | 50% |
| 2 | Year 1 Q1 Disbursement | 1.25% |
| 3 | Year 1 Q2 Disbursement | 1.25% |
| 4 | Year 1 Q3 Disbursement | 1.25% |
| 5 | Year 1 Q4 Disbursement | 1.25% |
| 6 | Year 2 Q1 Disbursement | 1.25% |
| 7 | Year 2 Q2 Disbursement | 1.25% |
| 8 | Year 2 Q3 Disbursement | 1.25% |
| 9 | Year 2 Q4 Disbursement | 1.25% |
| 10 | Year 3 Q1 Disbursement | 1.25% |
| 11 | Year 3 Q2 Disbursement | 1.25% |
| 12 | Year 3 Q3 Disbursement | 1.25% |
| 13 | Year 3 Q4 Disbursement | 1.25% |
| 14 | Year 4 Q1 Disbursement | 1.25% |
| 15 | Year 4 Q2 Disbursement | 1.25% |
| 16 | Year 4 Q3 Disbursement | 1.25% |
| 17 | Year 4 Q4 Disbursement | 1.25% |
| 18 | Year 5 Q1 Disbursement | 1.25% |
| 19 | Year 5 Q2 Disbursement | 1.25% |
| 20 | Year 5 Q3 Disbursement | 1.25% |
| 21 | Year 5 Q4 Disbursement | 1.25% |
| 22 | Year 6 Q1 Disbursement | 1.25% |
| 23 | Year 6 Q2 Disbursement | 1.25% |
| 24 | Year 6 Q3 Disbursement | 1.25% |

| | | |
|----|---|-------|
| 25 | Year 6 Q4 Disbursement | 1.25% |
| 26 | Year 7 Q1 Disbursement | 1.25% |
| 27 | Year 7 Q2 Disbursement | 1.25% |
| 28 | Year 7 Q3 Disbursement | 1.25% |
| 29 | Year 7 Q4 Disbursement | 1.25% |
| 30 | Year 8 Q1 Disbursement | 1.25% |
| 31 | Year 8 Q2 Disbursement | 1.25% |
| 32 | Year 8 Q3 Disbursement | 1.25% |
| 33 | Year 8 Q4 Disbursement | 1.25% |
| 34 | Year 9 Q1 Disbursement | 1.25% |
| 35 | Year 9 Q2 Disbursement | 1.25% |
| 36 | Year 9 Q3 Disbursement | 1.25% |
| 37 | Year 9 Q4 Disbursement | 1.25% |
| 38 | Year 10 Q1 Disbursement | 1.25% |
| 39 | Year 10 Q2 Disbursement | 1.25% |
| 40 | Year 10 Q3 Disbursement | 1.25% |
| 41 | Year 10 Q4 Disbursement and Closeout Report | 1.25% |

LEO Quarterly Report

LEO Subgrantees are responsible for filing the LEO Quarterly Report with ConnectMT for ten (10) years from the date that the LEO Subgrantee certifies to the Department that broadband is available to every location covered by the project.

The LEO Quarterly Report will at a minimum contain:

- The number of subscribers at the end of the reporting period.
- The number of consumer premises equipment (CPEs) shipped to project Broadband Serviceable Locations (BSLs) during the reporting period.