

ConnectMT BEAD Program

# BEAD Disbursement Process Guide

March 2026

## *Version History*

Version	Date	Update
1.0	2/2026	Initial Draft Created
2.0	3/2026	Milestone Disbursement Required Documentation Matrix Updated



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## 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.<sup>1</sup> 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 Euna Grants portal.

## Timelines

Subgrantees may submit a request for disbursement **upon the completion of a milestone**, as specified in the Grant Agreement.<sup>2</sup> 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 adhere to 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 guide.

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1 [https://broadbandusa.ntia.gov/sites/default/files/2024-06/Fixed\\_Amount\\_Subaward\\_One\\_pager\\_2.pdf](https://broadbandusa.ntia.gov/sites/default/files/2024-06/Fixed_Amount_Subaward_One_pager_2.pdf)

2 [https://connectmt.mt.gov/files/BEAD-Grant-Agreement-Non-LEO-Template\\_Final.pdf](https://connectmt.mt.gov/files/BEAD-Grant-Agreement-Non-LEO-Template_Final.pdf)

## 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.

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-Deployment – 15% of award amount
- Deployment – 60% 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-Deployment	Documentation of binding agreements for all required contracted labor and materials. Evidence of construction staging and material delivery for 20% of project BSLs.	3%
	Documentation of binding agreements for all required contracted labor and materials. Evidence of construction staging and material delivery for 40% of project BSLs.	3%

	Documentation of binding agreements for all required contracted labor and materials. Evidence of construction staging and material delivery for 60% of project BSLs.	3%
	Documentation of binding agreements for all required contracted labor and materials. Evidence of construction staging and material delivery for 80% of project BSLs.	3%
	Documentation of binding agreements for all required contracted labor and materials. Evidence of construction staging and material delivery for 100% of project BSLs.	3%
Deployment	Completed placement of broadband infrastructure and associated as-built documentation for 20% of project BSLs.	12%
	Completed placement of broadband infrastructure and associated as-built documentation for 40% of project BSLs.	12%
	Completed placement of broadband infrastructure and associated as-built documentation for 60% of project BSLs.	12%
	Completed placement of broadband infrastructure and associated as-built documentation for 80% of project BSLs.	12%
	Completed placement of broadband infrastructure and associated as-built documentation for 100% of project BSLs.	12%
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 EHP 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**

<b>Milestone category</b>	<b>Percentage of the award amount</b>	<b>Award amount</b>	<b>Anticipated Project Month Disbursement</b>
Project Plan	5%	\$375,000	3
Engineering & Permitting	10%	\$750,000	12
Pre-Deployment	15%	\$1,125,000	18
Deployment	60%	\$4,500,000	35
Network Activation & Program Closeout	10%	\$750,000	40

In this example, the subgrantee must complete the entire Deployment Milestone, in month 35 of their project, to receive the \$4,500,000 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.

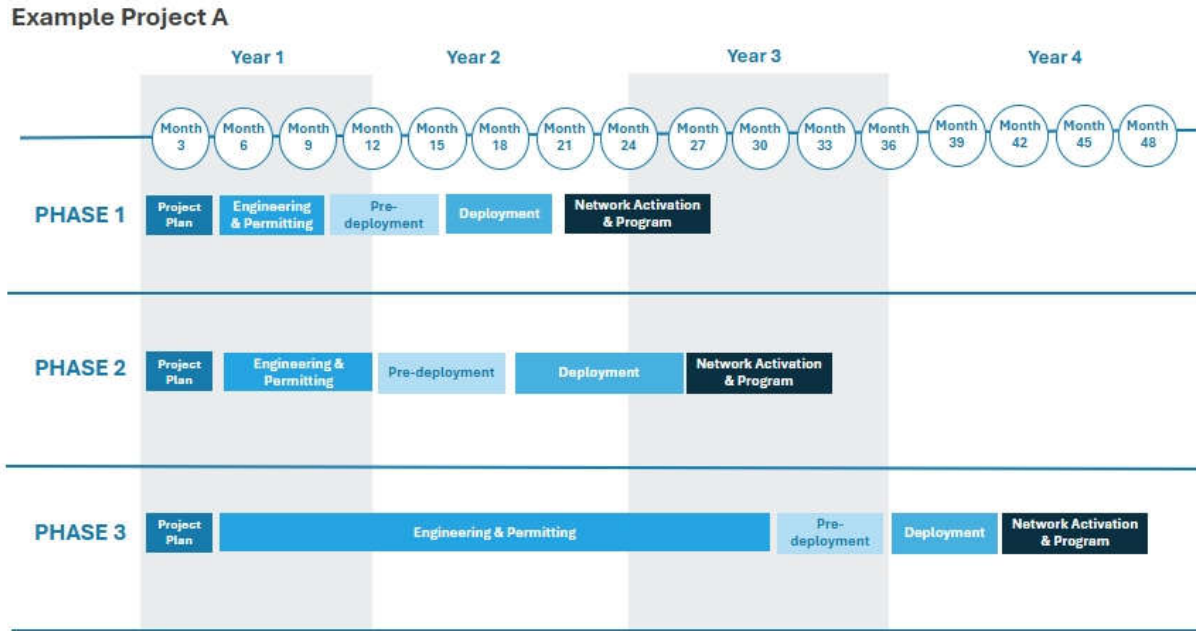
- Phase 1 will be 42% of BSLs;
- Phase 2 will be 85% of BSLs (43% to 85%);
- Phase 3 will be the final portion of BSLs up to 100%.

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

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

<b>Milestone category</b>	<b>Phase</b>	<b>Milestone</b>	<b>Award amount</b>
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-Deployment	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
Deployment	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**



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, 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 and 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-Deployment materials is done 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 Program 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 subgrantees documentation to substantiate these match expenditures.<sup>3</sup>

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.

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<sup>3</sup> [https://broadbandusa.ntia.gov/sites/default/files/2024-05/BEAD\\_Match\\_Primer.pdf](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-Deployment 	Deployment 	Network Activation & Program Closeout 
Location List	X	X	X	X	X
EHP Questionnaire	X				
Project Timeline	X				
Project Design Shapefiles	X	X		X	X
Detailed Design Drawings		X			
Permit Status Summary	X	X			
Evidence of Approved Permits		X			
Bill of Materials		X	X	X	X
Executed Contract(s) for Construction Labor			X		
Evidence of Material Procurement			X		
Evidence of Staging and Material Delivery			X		
Evidence of Environmental Approval			X		
Active Subscriber Test Results					X
Evidence of Expense Tracking, Match Obligation, and Record Retention	X				
Evidence of Match Obligation	X	X	X	X	X

Fixed Wireless Design <i>(wireless projects only)</i> to be developed	X	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 (CAIs) 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. Please note there are two Location List Templates, one specific to LEO projects and one specific to terrestrial projects. [\[Link\]](#)

*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 Design Shapefiles** submission required as part of the Project Plan Milestone.



### Engineering & Permitting

As part of the Engineering & Permitting Milestone submission, the Location List must be updated to identify which BSLs and CAIs are included as part of the milestone disbursement request. Subgrantees shall attest to meeting requirements of this milestone.



**TEMPLATE:** The Location List must be updated using the template previously submitted in the Project Plan Milestone. Subgrantees can follow the template instructions to complete the related template fields for this Milestone submission. [\[Link\]](#)

### Pre-Deployment

As part of the Pre-Deployment Milestone submission, the Location List must be updated to identify which BSLs and CAIs are included as part of the milestone disbursement request. Subgrantees shall attest to meeting requirements of this milestone.



**TEMPLATE:** The Location List must be updated using the template previously submitted in the Engineering & Permitting Milestone. Subgrantees can follow the template instructions to complete the related template fields for this Milestone submission. [[Link](#)]

## Deployment

As part of the Deployment Milestone submission, the Location List must be updated to identify which BSLs and CAIs are included as part of the milestone disbursement request. Subgrantees shall attest to meeting requirements of this milestone.



**TEMPLATE:** The Location List must be updated using the template previously submitted in the Pre-Deployment Milestone. Subgrantees can follow the template instructions to complete the related template fields for this Milestone submission. [[Link](#)]

## Network Activation & Program Closeout

As part of the Network Activation & 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.<sup>4</sup>



Additionally, the subgrantee will identify the maximum download and upload speeds offered for each indicated location, and the anticipated latency.

**TEMPLATE:** The Location List must be updated using the template previously submitted in the Deployment Milestone. Subgrantees can follow the template instructions to complete the related template fields for this Milestone submission. [[Link](#)]

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

## EHP Questionnaire

Completion of the EHP Questionnaire 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 EHP Questionnaire must be submitted for the following milestone(s):*

### Project Plan

The EHP Questionnaire 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 Euna Grants.

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 Design Shapefiles

The Project Design Shapefiles 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.

*Project design shapefiles must be submitted for the following milestone(s):*

### Project Plan

As part of the Project Plan Milestone submission, project design shapefiles 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 (BSLs) and Community Anchor Institutions (CAIs) 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 Timeline Template submission for the Project Plan milestone. For projects that do not include phased construction or that consist of a single construction phase, the full project area shall be submitted as a single polygon feature.
- For Licensed and Unlicensed FWA projects, provide a layer with a point attribute containing each site with fields described in the Sites tab in the FWA Design Template. For BSLs and CAIs, provide the fields in the BSL tab of the FWA Design Template. Also, provide propagation layers that contain received level (or Reference Signal Received Power (RSRP) for 3GPP technologies). The bin sizes for the propagation layers should be no larger than 50 meters.

## Engineering & Permitting

As part of the Engineering and Permitting Milestone submission, updated project design shapefiles 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.



The project design shapefiles must align with the subgrantee's **Detailed Design Drawings** and **Bill of Materials** submissions required as part of the Engineering & Permitting Milestone. The project design shapefiles 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.
- **Slack storage** is a fiber coil or snowshoe on the network where additional fiber cable is stored for the purpose of network maintenance or future network access points.
- The layers must be titled “network\_access\_points,” “splice\_points,” and “slack\_storage,” respectively.
- Broadband Serviceable Locations (BSLs) and Community Anchor Institutions (CAIs) 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.
- 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.”
- For Licensed and Unlicensed FWA projects, provide a layer with a point attribute containing each site with fields described in sites tab in the FWA template. For BSLs and CAIs, provide the fields in the BSL tab of the FWA template. Also, provide propagation layers that contain received level (or Reference Signal Received Power (RSRP) for 3GPP technologies). The bin sizes for the propagation layers should be no larger than 50 meters.

## Deployment

As part of the Deployment Milestone submission, updated project design shapefiles 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.



The project design shapefiles must align with the subgrantee's **Bill of Materials** submission required as part of the Deployment Milestone. The project design shapefiles 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 Deployment milestone submission, but must be then included as part of the Network Activation & 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.
  - **Slack storage** is a fiber coil or snowshoe on the network where additional fiber cable is stored for the purpose of network maintenance or future 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 (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 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, updated project design shapefiles 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 Deployment Milestone. This submission represents the subgrantee’s “final as-built documentation”. This submission must include the same details as required by the Deployment 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 Grant 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 Design Shapefiles** 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)
- Tower locations with equipment elevations
- 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.

The subgrantee must continue to maintain the Permit Status Summary until grant closeout and shall submit an updated Permit Status Summary for each quarter or at intervals specified by ConnectMT. ConnectMT reserves the right to request the submission of an updated Permit Status Summary at any time. If the subgrantee encounters an issue obtaining required permits, it is the subgrantee's obligation to immediately escalate to the state for assistance resolving the issue.

### 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 & 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 as part of the Engineering and Permitting Milestone (excluding NEPA and 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-Deployment milestone and each deployment milestone for which they seek disbursement. There may be additional requirements for BABA documentation from NTIA.

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 & 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-Deployment Milestone submission and placed as part of the Deployment 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 Design Shapefiles** and **Detailed Design Drawings**.

## Pre-Deployment

As part of the Pre-Deployment 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.

## Deployment

As part of the Deployment 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 Design Shapefiles** submitted as part of the Deployment Milestone submission.



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

## Network Activation & Program Closeout

As part of this milestone submission, the subgrantee must provide an updated BOM to indicate the quantities of materials that have been deployed as part of network activation. The material quantities indicated as deployed should align with the Project Design Shapefiles submitted as part of the subgrantee's as-built documentation.



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

## Executed Contract(s) for Construction Labor

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

### Pre-Deployment

As part of the Pre-Deployment 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.

## Evidence of Material Procurement

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

### Pre-Deployment

As part of the Pre-Deployment 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-Deployment Milestone submission.

For subgrantees 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-Deployment 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-Deployment

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



The subgrantee can provide evidence of project staging by 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-Deployment 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-Deployment

As part of the Pre-Deployment 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's performance requirements. Detailed testing requirements associated with the disbursement milestones for “Network Activation & Testing” (terrestrial projects) and “Capacity Verification – Take-Rate” (LEO projects) are as follows. The testing is project-specific and does not fulfill the requirements for annual performance tests but has been aligned with the annual tests to leverage the same applicable test parameters and test configuration.

BEAD-funded networks must meet three core technical standards:

- Speed requirements of at least 100 Mbps download and 20 Mbps upload for broadband serviceable locations and 1 Gbps symmetrical for Community Anchor Institutions (CAIs);
- Latency standards requiring that 95 percent of round-trip measurements fall at or below 100 milliseconds; and
- Reliability standards limiting network outages to no more than 48 hours on average over any 365-day period (99.45% uptime), excluding natural disasters, force majeure events, and publicized, scheduled maintenance.

To comply with speed standards, providers must demonstrate that 80 percent of download measurements meet or exceed 80 percent of the required download speed, and 80 percent of upload measurements meet or exceed 80 percent of the required upload speed—for example, for 100/20 Mbps service, 80 percent of tests must achieve at least 80/16 Mbps.

ConnectMT will select active subscriber locations within the subgrantee's project area for performance testing from the list of active subscriber locations provided by the subgrantee. Selection criteria are as follows:

- Maximum of 10 percent of active subscriber locations, not to exceed 50, for all BEAD projects.
- For subgrantees with more than 10 but fewer than 100 active subscriber locations, ConnectMT will select 10 locations for testing.
- For subgrantees with 10 or fewer active subscriber locations, **all locations** will be selected for testing.
- If none of the locations that are selected by ConnectMT subscribes to a top-tier speed offering, the subgrantees will include testing at a location that does subscribe to a top-tier speed offering. If there are no locations within the project area that subscribe to the top-tier service offering, the subgrantees will upgrade one of the locations selected by Connect MT temporarily to allow for testing at the top-tier speed. If the project area includes both CAI and BSL locations, the subgrantees will conduct testing at one CAI and one BSL location that subscribe to the top-tier speed offering. If no CAI or BSL location in the project area currently subscribes to the top-tier

speed, the subgrantees will temporarily upgrade one CAI and one BSL location, as selected by Connect MT, to the top-tier speed to facilitate testing.

**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:



- ConnectMT will select locations within the subgrantee’s project area for performance testing based on the number of locations in a project area where the applicant has confirmed active subscribers, as described above.
- The subgrantee will conduct speed and latency tests for each location selected by ConnectMT.
- Upload/Download tests will be conducted, at a minimum, once per hour from 6:00 PM to 12:00 AM, for a minimum of six tests per location over any contiguous 72-hour period following activation of a given subscriber.
- Latency tests are conducted in each minute of the hour from 6:00 PM to 12:00 AM, which corresponds to 60 tests in each hour and a total of 360 tests for each address.
- Subgrantees must provide the test results to Connect MT using the “Active Subscriber Test Template” with applicable milestone disbursement requests.

Tests will be conducted between the customer premises of selected **active subscribers** and 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). To qualify, the ASN must either appear on the FCC's Appendix B list of qualifying ASNs (pages 40 and 41 of FCC-19-104A1) or satisfy the alternative qualifying criteria established under footnote 36 on page 8 of FCC-19-104A1.<sup>5</sup>

The testing methodology allows providers to use built-in capabilities of customer premises equipment, such as optical network terminals or residential gateways, or to deploy dedicated measurement devices at subscriber locations, with testing conducted from customer premises to FCC-designated Internet exchange points.<sup>6</sup>

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<sup>5</sup> Criteria (1), (2), and (3) can be verified using the CAIDA AS Rank database at <https://asrank.caida.org/>, while criteria (4) and (5) can be verified using PeeringDB at <https://www.peeringdb.com/>.

<sup>6</sup> Federal Communications Commission, “*In the Matter of Connect America Fund; Order on Reconsideration*,” WC Docket No. 10-90, FCC 19-104A1 (adopted Oct. 25, 2019; released Oct. 31, 2019), available at <https://docs.fcc.gov/public/attachments/FCC-19-104A1.pdf>

As noted, testing is required only for the sample set of locations selected by ConnectMT, which can be initiated any date after subscriber activation is complete for a given location prior to submitting the test data for the corresponding disbursement request. A subgrantee may elect to test all locations upon activation to avoid future disruption to active subscribers, but only the test data associated with the sample locations selected by ConnectMT should be submitted with the disbursement request.

## Evidence of Expense Tracking, Match Obligation, and Record Retention

The Evidence of Expense Tracking, Match Obligation, and Record Retention documentation demonstrates that the subgrantee is meeting BEAD Program requirements related to financial management, proportional match tracking, and long-term recordkeeping. Subgrantees must show that they have systems in place to track project expenditures accurately, document all match contributions, and maintain the required records for audit and compliance purposes.

This documentation verifies that the subgrantee:

- Has established appropriate systems for tracking all BEAD related expenses, including federal and nonfederal match contributions.
- Documenting match expenditures in a manner that ensures match is applied proportionally to federal funds, consistent with BEAD requirements.
- Has internal processes and policies in place to meet federal record retention requirements, including maintaining all financial and program documentation for the required period.

Subgrantees must maintain complete financial records—including receipts, invoices, payroll records, and documentation of matching funds—and must retain these records throughout the period of performance and for at least seven years after final payments and the award is closed out

This documentation must be submitted through ConnectMT's grant management system (Euna Grants) using the template provided by ConnectMT.

**TEMPLATE:** The Expense Tracking Template must be submitted using the template provided by ConnectMT: [\[Link\]](#)

*The Evidence of Expense Tracking, Match Obligation, and Record Retention Template must be submitted for the following milestone(s):*

## **Project Plan**



As part of the Project Plan milestone, the subgrantee must submit the Evidence of Expense Tracking, Match Obligation, and Record Retention documentation. This submission must demonstrate that the subgrantee has:

### **1. Expense Tracking Systems in Place**

The subgrantee must show that it has established financial management systems capable of:

- Tracking actual project expenditures (not just budgeted costs).
- Separately tracking federal funds and match contributions.
- Recording expenditures in accordance with Generally Accepted Accounting Principles (GAAP).
- Supporting future monitoring and audit activities by maintaining source documentation (e.g., invoices, etc.).

### **2. Match Tracking Controls**

The subgrantee must demonstrate that it can track match funds in compliance with BEAD Program requirements, including:

- Recording the source, amount, and type of match (cash or in-kind).
- Ensuring match expenditures are proportional to federal funds over the life of the project.
- Maintaining documentation to substantiate all match claims.

### **3. Record Retention Practices**

The subgrantee must attest that it has internal policies and procedures for maintaining all grant related records—including financial, programmatic, procurement, and match documentation—for the required seven-year retention period.

Documentation must show that the subgrantee maintains:

- A centralized and organized grant file or document repository.
- Policies governing how financial and programmatic records are stored and accessed.
- Processes that allow prompt production of records for monitoring or audit

## Subsequent Milestones

Subgrantees must continue maintaining complete expense and match documentation internally. ConnectMT may request additional supporting records at any time throughout the project during:

- Quarterly reporting
- Desk reviews
- Field inspections
- Site visits, and
- Closeout

Failure to maintain or produce required records may result in delayed disbursements and additional monitoring.

## Evidence of Match Obligation

The Evidence of Match Obligation documentation demonstrates that the subgrantee is meeting the BEAD Program’s matching requirements. Subgrantees must show that match contributions are allowable, properly documented, and tracked proportionally against federal expenditures for the duration of the project. This documentation provides ConnectMT with assurance that match sources are valid, available, and applied in accordance with the approved match percentage outlined in the Grant Agreement.

Subgrantees must submit this documentation in Euna Grants using the Evidence of Match Obligation template provided by ConnectMT, along with the Match Tracking Excel Workbook

The Evidence of Match Obligation submission must include:

- Completed Match Tracking Template
- Certification and Attestation, completed and signed by an authorized signatory, confirming that:
- All documented costs are eligible and allowable under BEAD and 2 C.F.R. Part 200;
- Match is non-federal, properly valued, reasonable, and allocable;
- Supporting documentation for valuation, availability, and proportionality is accurate

ConnectMT may request additional supporting materials—including agreements, invoices, timesheets, valuation records, or audit-ready backup—if further verification is needed.

## Project Plan

As part of the Project Plan milestone, subgrantees must demonstrate that they have identified all match sources and can track them appropriately. The required submission should:



- Identify all committed match sources (cash and/or in-kind).
- Confirm that all match is non-federal and consistent with 2 C.F.R. 200.306 requirements.
- Provide preliminary entries in the Match Sources tab showing match type, value, and availability.
- Demonstrate that match contributions are sufficient relative to the approved match percentage in the Grant Agreement.
- Confirm readiness to track match proportionally using the Summary tab’s required fields and eligibility formulas.

This milestone focuses on establishing the match structure rather than showing proportionality to federal spending, which will occur in later submissions.

## Engineering & Permitting

At the Engineering & Permitting milestone, subgrantees must update the Evidence of Match Obligation to reflect any match used to support engineering, permitting, or environmental activities. The submission should demonstrate:



- Match expenditures to date in the Summary tab, aligned with eligible project activities.
- Updated match entries in the Match Sources tab, with values that reflect both cash and in-kind contributions.
- Confirmation that match is being contributed proportionally, using the workbook's auto-calculated comparison between the Approved Match Share (%) and Calculated Match Share.
- Appropriate supporting documentation for in-kind contributions (e.g., labor hours, equipment use, valuation methodology).

Any variances from the approved match structure must be explained and supported.

## Pre-Deployment

For the Pre-Deployment milestone, the Evidence of Match Obligation must reflect additional match expenditures tied to material acquisition, staging, and construction mobilization. Submissions must include:



- Updated match values for all contributions associated with Pre-Deployment activities.
- Documentation of valuation methods for in-kind contributions.
- Evidence that match contributions remain proportional compared to the requested BEAD reimbursement.

Subgrantees should ensure that all match attributed during this milestone directly supports the BEAD funded scope.

## Deployment

During the Deployment milestone, subgrantees must demonstrate that match contributions continue to be proportionally aligned with federal expenditures as construction activities accelerate. The submission should include:



- A current Summary tab showing total eligible costs, the BEAD portion, match portion, and proportionality results.
- Match Sources tab entries documenting new match contributions—particularly in-kind labor, equipment, or materials used during construction.

- Supporting evidence for match valuation, including original cost records, timesheets, contracts, procurement documentation, or internal inventory documentation.

Any failure to maintain proportional match may delay disbursement until corrected.

## Network Activation & Program Closeout

For the final milestone, subgrantees must demonstrate that they have fully satisfied their match obligation. The Evidence of Match Obligation submission must show:



- The complete match contribution for the entire project, consistent with approved match requirements.
- Final proportionality calculations on the Summary tab, ensuring compliance with the approved federal/match ratio.
- Completed Certifications and Attestations, signed by an authorized individual, confirming accuracy and compliance.
- Full supporting documentation for all match contributions, including valuation records for in-kind contributions, to support audit readiness at closeout.

Final acceptance of the project will depend on ConnectMT's verification of full match compliance.

## Fixed Wireless Design

The Fixed Wireless Access (FWA) Design Template submission demonstrates that the proposed wireless infrastructure, service area, equipment, and technology match those approved in the Grant Agreement, confirming that the wireless components of the network are capable of consistently delivering the minimum proposed speeds to all proposed project locations.

Subgrantees will be required to submit a FWA Design Template at each milestone that includes any design updates that have occurred since the last milestone, including but not limited to site location changes, site coordinate corrections, antenna azimuth and mounting height adjustments, equipment make or model changes, and backhaul changes. All BSLs reported in the template must match the BSLs awarded.

Propagation must be calculated to each BSL using a vetted propagation tool, with results for signal intensity and signal quality reported in the corresponding fields. Propagation paths shall be calculated and analyzed from each sector to the BSLs served by the given sector; results obtained by point querying a grid are not acceptable. The corresponding throughputs for each BSL will be determined from the vendor-provided MCS tables; these throughputs should not be provisioned or nominal throughputs.

For designs using multiple bands, propagation from each band shall be provided and reflected for each BSL in the FWA Design Template by adding columns for signal intensity, signal quality, uplink throughput, and downlink throughput for each band per BSL.

All BSLs must accurately report the serving sector ID. All sectors in the Sectors tab must reflect the correct site where the given sector is present.

**TEMPLATE:** The Fixed Wireless Design Template must be submitted to ConnectMT's grant management system (Euna Grants) using the template provided by ConnectMT: [\[Link\]](#)

## Project Plan

As part of the Project Plan milestone submission, the submission of the FWA Design Template is required to capture any changes made to the radio frequency (RF) engineering design because of changes to the project plan. Subsequently, changes in cover may occur, and RF propagation may change.



## Engineering & Permitting

As part of the Engineering and Permitting milestone submission, the submission of the FWA Design Template is required to capture any changes made to the RF engineering design because of changes to engineering and permitting. Subsequently, changes in cover may occur, and RF propagation may change.



## Deployment

As part of the Deployment milestone submission, the submission of the FWA Design Template is required to capture any changes made to the RF engineering design because of changes to the deployment. Subsequently, changes in cover may occur, and RF propagation may change.



## Network Activation & Program Closeout

As part of the Network Activation and Program Closeout milestone submission, the submission of the FWA Design Template is required to capture any changes made to the RF engineering design because of changes to the deployment (specifically when RF propagation overpredicts signal strength and the subgrantee need to alter the design to cover BSLs). Subsequently, changes in cover may occur, and RF propagation may change.



## Acceptance Testing

### Deployment

As part of the Network Activation & Program Closeout milestone submission, the submission of the FWA Design Template is required to capture any changes made to the RF engineering design because of changes to the deployment (specifically when RF propagation overpredicts signal strength and the subgrantee need to alter the design to cover BSLs). Subsequently, changes in cover may occur, and RF propagation may change.



## 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.