Montana BEAD Program FAQs

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Frequently Asked Questions

Please note that this document has been updated following the provisional selection of BEAD awardees.

1. GENERAL INFORMATION

1.1. What is BEAD?

Response: The Broadband Equity, Access, and Deployment (BEAD) program provides \$42.45 billion to expand high-speed internet access by funding planning, infrastructure deployment, and adoption programs. Montana was allocated a \$629 million grant under the BEAD program to improve broadband coverage across the state. BEAD program requirements focus this funding on unserved, locations unable to obtain broadband service of at least 25 Megabits per second (Mbps) downstream and three (3) Mbps (25/3 Mbps), and underserved locations, those locations with broadband service between 25/3 Mbps and 100/20 Mbps, and 1 Gbps symmetric for community anchor institutions (CAIs).

1.2. What are the requirements for the State to receive BEAD funding?

Response: To receive the \$629 million in BEAD funding, the State must comply with the NTIA requirements. The Montana Broadband Office (MBO) has completed all prior and updated requirements to date. As required by NTIA, MBO conducted a subgrantee selection process and submitted a final proposal to NTIA on September 3, 2025.

1.3. What unserved and underserved areas were prioritized during the BEAD application process?

Response: The State complied with the NTIA BEAD Notice of Funding Opportunity (NOFO) requirements when selecting projects. Under NTIA guidelines, the State must award projects to provide coverage of all unserved locations followed by all underserved locations and if funding allows eligible community anchor institutions. The Initial Proposal Volume 2 and the BEAD Restructuring Policy Notice outline the process the state used to select subgrantees.

1.4. Who was eligible to receive BEAD funding from the ConnectMT Broadband Office?

Response: Consistent with SB 531, an eligible applicant means an entity that has authorization to do business in the state and has demonstrated that it has the technical, financial, and managerial resources and experience to provide broadband service or other communications services to customers in the state. This includes incorporated businesses or partnerships, Montana nonprofit organizations, limited liability companies, corporations, or cooperative entities organized for the purpose of expanding broadband access. A government entity or tribe is only eligible to apply in partnership with an eligible broadband service provider.

To be eligible to receive BEAD funding from the State of Montana, subgrantees must:

1. Meet mandated financial, operational, and managerial requirements

- 2. Propose a project that will provide a minimum 100/20 Mbps broadband service to all locations within the service area within a 4-year timeline
- 3. Be able to comply with all requirements mandated by the NTIA and the State of Montana

1.5. What is the matching requirement for the BEAD program? Do waivers exist for this matching requirement, and in what circumstances would those waivers be provided?

Response: As noted in the BEAD NOFO, except for specific circumstances where NTIA has waived the matching requirement, subrecipients were required to provide a match of 25% of subaward amount. NTIA removed the match requirement for the NTIA defined High Cost CBGs. Please note, this is only for the 23 CBGs designated as high cost by NTIA. (A list of high cost areas by census block group can be found on the ConnectMT IIJA/BEAD Resources page under NTIA BEAD Program.) With regards to match waivers, NTIA granted all relevant waivers for High Cost area projects in Montana.

2. SUBGRANTEE SELECTION PROCESS

2.1. What was the Montana BEAD Challenge Process?

Response: During the initial Map Challenge Process, eligible challengers such as nonprofits, internet service providers (ISPs), and local and tribal governments were invited to submit challenges to the National Broadband Map to help MBO finalize the list of BSLs and CAIs eligible for BEAD funding. Through a transparent, evidence-based, and fair review of submitted evidence, MBO determined if challenges were sustained or rejected to finalize the list of unserved, underserved, and served locations for the BEAD Program. As required by the BEAD Restructuring Notice in June 2025, MBO also held an Unlicensed Fixed Wireless (ULFW) Challenge Process.

2.2 How was the Prequalification Application Round conducted for the BEAD program?

Response: In accordance with the Initial Proposal Volume 2, MBO launched this phase in March 2024. The prequalification phase of the subgrantee selection process was used to determine whether applicants met the BEAD minimum eligibility requirements, including financial capability, organizational capability, certifications, and compliance. MBO received 26 prequalification applications; 22 were determined to be eligible, and 4 were found to be ineligible.

Following the issuance of NTIA's BEAD Restructuring Policy Notice, MBO reopened the prequalification process during the Benefit of the Bargain Round in June 2025. The following were invited to participate in the reopened prequalification process: new entrants seeking to participate in the BEAD program (regardless of technology), and existing applicants who had previously failed prequalification and chose to update their materials to seek prequalification again. Previously approved prequalified applicants were not required to reapply. MBO reviewed newly submitted prequalification applications in accordance with the new guidance provided by NTIA in the BEAD Restructuring Policy Notice. MBO received 6 new prequalification applications; 4 were determined to be eligible, and 2 were found to be ineligible.

2.3 How many application rounds did Montana conduct, and how were BEAD applications reviewed?

Response: Montana conducted two application rounds following the prequalification phase. In October 2024, MBO launched the Main Round BEAD application round for both Priority and Non-Priority applications. MBO received a total of 42 applications and initiated its application review and negotiation process as outlined in Initial Proposal Volume 2. Pending new guidance from NTIA and the Trump Administration, MBO paused all other program activities.

On June 6, 2025, the NTIA BEAD Restructuring Policy Notice was released, requiring MBO to conduct a Benefit of the Bargain Round, in which MBO would evaluate or reevaluate applications for every BEAD-eligible location, regardless of technology. Any applicants who had previously submitted a successful prequalification application were able to apply to the Benefit of the Bargain Round. Applicants who had previously submitted project applications in the Main Round could choose to either update and resubmit their existing application or submit a new application. The Benefit of the Bargain Round closed in July 2025.

2.4 Which project and awardee requirements were altered and/or removed due to the NTIA Restructuring Policy Notice (RPN)? Where can I find details about the affected requirements?

Response: The RPN released by NTIA on June 6th made the following changes to BEAD program requirements:

- Definition of Priority Projects: The term Priority Broadband Project is defined as a project that meets certain upload, download and latency requirements, regardless of technology type.
- Labor, Employment, and Workforce Development: Non-statutory requirements related to labor, employment, and workforce development in the BEAD NOFO are no longer required.
- Climate Change: Requirements related to climate change, specifically the Climate Resilience section of the BEAD NOFO, are no longer required.
- Open Access/Net Neutrality: Requirements related to open access and net neutrality stated in the NOFO are no longer required, specifically ensuring that data usage caps on any plans offered are not imposed on consumers.
- Local Coordination and Stakeholder Engagement: Awardees are no longer required to consult with representatives of various demographics and identity-based groups.
- Non-Traditional Broadband Providers: Traditional and non-traditional Broadband providers, such as municipalities or political subdivisions, are evaluated and considered equally.

- Middle Class Affordability Plan: Awardees are no longer required to develop a middle-class affordability plan.
- Low-Cost Service Option: Non-statutory requirements in the BEAD NOFO related to low-cost broadband service option are eliminated, specifically the Affordability and Low-Cost Plans. Note that awardees are still required to provide at least one Low-Cost Service Option and can set the price for this service.

For further details regarding eliminated requirements from the BEAD NOFO, see the full RPN Document here.

2.5 Were BEAD applications re-scored with the new criteria from the updated NTIA policy guidance?

Response: Yes, following the Restructuring Policy Notice, Montana updated its scoring criteria to focus on cost minimization, and applications received a new score. See the approved scoring rubric on the ConnectMT page Internet Service Provider Information for updated criteria.

2.6 Will the BEAD application summaries be posted after the application window closes?

Response: Montana included application summaries as part of the Final Proposal, which was submitted and posted in September 2025 and is currently pending NTIA approval. The proposal outlines the projects provisionally selected for funding.

2.7 When will subgrantee awards be determined?

Response: DOA is working diligently to continue the progress of the BEAD program. Montana's Final Proposal was submitted in September of 2025 to NTIA and is pending approval. DOA will finalize project details and award agreements with potential awardees following NTIA approval.

2.8 Did the same companies receive funding as ARPA?

Response: The Department performed a subgrantee selection process consistent with SB 531, the Initial Proposal, and subsequent NTIA guidance. Companies that received ARPA funding may choose to apply for additional projects through the BEAD application process.

2.9 If a competing application was selected over mine, am I able to know the details that went into that decision?

Response: If you have any questions regarding why a competing application was selected rather than yours for a given location, please contact the MBO office.

3. ELIGIBLE LOCATIONS AND MAPPING

3.1. What is the Montana Broadband Availability Map?

Response: The Broadband Availability Map is the outcome of Montana's BEAD Challenge process, identifying which locations within Census Block Groups (CBGs) are eligible for funding under the BEAD program. It can be found at https://connectmt.mt.gov/IIJA/IIJA-Map. Each CBG outlines the number of served, unserved, and underserved locations, the total number of locations, the benchmarking reference price, and the percentage of the CBG eligible for BEAD funding. With the issuance of the BEAD Restructuring Policy Notice, it was updated as of July 16, 2025.

3.2. How do I show only BEAD-eligible locations?

Response: To view BEAD-eligible location data only, remove all layers on the map. Go to the IIJA Map page. Select the State Broadband Availability Map drop-down. Select the State Broadband Availability Map. On the map home page, at the top right of your screen, you will see three icons. Select the middle icon (layer list). Please unselect the five FCC USAC locations: the FCC Rural Digital Opportunity Fund, the FCC Enhanced Alternative Connect America Cost Model, The USDA ReConnect Loan and Grant Program, and the US Treasury American Rescue Plan by clicking the blue check marks. Once all these layers are removed, the resulting map view will show BEAD-eligible locations.

3.3. How do I learn more about the Montana Broadband Availability Map functionality?

Response: Refer to the State of Montana BEAD Broadband Map How-to Guide for step-by-step instructions. This guide outlines the purpose of each map, outlines how to access the map, and provides detailed instructions on using features and functionalities.

3.4. Has the ConnectMT Broadband Office published a location eligibility list?

Response: Yes, the current Locations List spreadsheet includes the official list approved by NTIA on June 30, 2025. Applicants can find the template on the ConnectMT website under Internet Service Provider Information and Benefit of the Bargain Application Materials.

3.5. What version of the fabric data was used during the Benefit of the Bargain round?

Response: Fabric Version 3.2 was used as the foundational dataset and MBO modified it to incorporate updates from Fabric Version 6, which allowed for the removal of locations no longer eligible for BEAD funding.

3.6. My house is listed as an eligible location to receive service. Who will be providing the service and what kind of technology will it be?

Response: As outlined by NTIA, all eligible locations will receive service under the BEAD program. Once NTIA has approved Montana's Final Proposal and MBO has fully executed its award agreements, interested parties may refer to the Montana Broadband Availability Map. The map will be updated to reflect the provider and technology type to serve each eligible location.

3.7. If my house is indicated as served by Satellite Internet service, what does this mean for me?

Response: Satellite internet service providers are still subject to the same upload, download, and latency speed requirements for all BEAD projects as set by NTIA. More guidance regarding low-earth orbit (LEO) Internet and how it will be accessed is forthcoming.

4. PROGRAMMATIC REQUIREMENTS

4.1. What process did awardees follow if their project locations intersect with Tribal Lands?

Response: Applicants that submitted applications for project areas that are partially or wholly located on Tribal Lands must secure written permission from the Tribe or Tribes that own the land. The applicant must submit a Resolution of Consent or other formal demonstration of consent from each Tribal Government, either from the Tribal Council or other governing body, upon whose Tribal Lands the infrastructure will be deployed. Sub-awardees must provide a Resolution of Consent within six months of the approval of the BEAD Final Proposal.

4.2. Are there any resources available if I have questions regarding permitting or other agency-specific issues?

Response: Yes. For permitting or other agency-specific questions, please reach out to the agency directly. More details can be found at each of the links below:

- National Environmental Policy Act (NEPA)
- National Historic Preservation Act (NHPA)
- Montana State Historic Preservation Office (MT SHPO)
- Montana Sage Grouse Habitat Conservation Program
- Montana Department of Transportation (MDT)
- Montana Department of Environmental Quality (DEQ)
- Montana Department of Natural Resources & Conservation (DNRC)

5. REPORTING REQUIREMENTS AND REIMBURSEMENT

5.1. Has NTIA provided guidance on what will be required for internal reporting (items such as payroll, wage licenses, etc.)?

Response: NTIA is currently updating guidance. MBO anticipates subgrantees will be required to submit reports to the state, at least semiannually, for the duration of the subgrant to track the effectiveness of the use of funds provided.

Subgrantee reports must include the following items:

- Description of each type of project and/or other eligible activities carried out using the subgrant and the duration of the subgrant
- A list of addresses or location identifications (including the Broadband Serviceable Location Fabric established under 47 U.S.C. 642(b)(1)(B)) that constitute the service locations that will be served by the broadband infrastructure to be constructed and the status of each project
- Identification of new locations served within each project area at the relevant reporting intervals, and service taken (if applicable)
- Identification of whether each address or location is residential, commercial, or a community anchor institution
- Description of the types of facilities that have been constructed and installed
- Description of the peak and off-peak actual speeds of the broadband service being offered
- Description of the maximum advertised speed of the broadband service being offered
- Description of the non-promotional prices, including any associated fees, charged for different tiers of broadband service being offered
- List of all interconnection agreements that were requested, and their current status
- Any other data that would be required to comply with the data and mapping collection standards of the Commission under Section 1.7004 of title 47, Code of Federal Regulations, or any successor regulation, for broadband infrastructure projects
- Inclusion of an SF-425, Federal Financial Report and meeting the requirements described in the Department of Commerce Financial Assistance Standard Terms and Conditions, Section A.01 for Financial Reports
- Compliance with any other reasonable reporting requirements determined by the Eligible
 Entity to meet the reporting requirements established by the Assistant Secretary, and
 certify that the information in the report is accurate

5.2. What can awardees expect the Reimbursement Process to be for the Monitoring and Compliance phase of the BEAD program?

Response: A milestone reimbursement process will be implemented, disbursing funds to each subgrantee only after the successful and verified completion of each predefined project milestone. Reimbursement requests must be submitted through the AmpliFund portal. Each subgrantee will have a milestone-based budget and disbursement schedule specific to their project. For further details regarding the Reimbursement Process' timeline, project phasing, and examples, see the draft Reimbursement Process Guide here.

5.3. What are the performance monitoring reporting requirements for the BEAD program?

Response: In September 2025, NTIA released the <u>BEAD Policy Notice: Performance Measures for the BEAD Last-Mile Networks.</u> The policy notice outlines what subgrantees must test with regards to network speed, latency, and availability, how the tests are to be completed, and the frequency of testing required.

- Speed: NTIA requires that 80% of download and upload measurements be at or above 80% of the required speed tier. Upload and download tests are counted separately.
- Latency: 95% of the measurements must be at or below 100 milliseconds.
- Network Availability: the provider must show an average outage across its locations below 48 hours per calendar year.

Subgrantees must test a random sample size of active subscribers for each speed tier and technology type. The number of test locations is based on the FCC BDC map and determined by the number of active subscribers. Testing will begin during the BEAD program period of performance and be conducted annually at a minimum.

A provider is considered non-compliant if it fails to meet any of the four thresholds: download, upload, latency, or availability criteria. A provider is also considered non-compliant if it fails to use compliant testing methodology, fails to report measurement results on time, or fails to comply with transparency requirements in accordance with the NOFO and terms and conditions of an award.

6. ENVIRONMENTAL AND HISTORICAL PRESERVATION

6.1. What are the Environmental and Historical Preservation Requirements under the BEAD program? Were these requirements affected due to the Restructuring Policy Notice released by NTIA in June 2025?

Response: The BEAD program and its participants must comply with Environmental and Historical Preservation Requirements set by NTIA. Eligible Entities and awardees are still responsible for obtaining all necessary federal, state, and local governmental permits on the

environment. The RPN did not alter any Environmental or Historical Preservation Requirements for awardees.

6.2. In addition to the National Environmental Policy Act (NEPA), Montana has the Montana Environmental Policy Act (MEPA). Which law takes precedence?

Response: Applicants must adhere to NEPA first, and MEPA second as federal statutes supersede state law. To view the most updated guidance from NTIA regarding NEPA, visit NTIA's website NEPA Resources page.

6.3. Are LEO satellite providers subject to the same NEPA and NHPA BEAD requirements as terrestrial internet providers?

Response: Due to LEO satellite providers not funding a defined portion of the transmission work in the same way that land-based systems are funded, LEO satellite providers can possibly be exempt from NEPA requirements. These providers must provide documentation to NTIA, which will identify excluded satellite projects within the program. See the <u>BEAD Guidance on NEPA and NHPA for LEO Satellite Service - October 2025</u>

7. BEAD AWARD COMPLIANCE

7.1. If an applicant submits an application comprised solely of a high-cost Census Block Group (CBG) that is exempt from the match requirements, is a Letter of Credit still required?

Response: Yes, a Letter of Credit is a required component of all applications.

7.2. Are assets purchased under this program subject to federal interest?

Response: Yes. The Federal Interest Period as defined in the draft grant agreement will last until December 31st of the 10th year after the acceptance of the Closeout Report by the Department of Commerce (DOC) and NTIA. If awarded a grant, please review the final grant agreement as this requirement may change. The State will determine if there will be additional filing and reporting requirements with regards to the Federal Interest at a later date. See the draft <u>Grant Agreement</u> and its <u>Exhibits</u> posted on the ConnectMT website.

7.3. Can you confirm the number of years that post completion reporting will be required?

Response: Subgrantee reporting will be required for four years after the date on which the subgrantee receives the subgrant and 120 days prior to the end of the period of performance for MT BEAD in accordance with 2 C.F.R. 200.344. After this date, any additional reporting is dependent upon the application's technology type.

7.4. Does BABA apply to all BEAD projects, including BEAD LEO projects?

Response: Yes, BABA applies to all BEAD projects. BABA applies to infrastructure projects, including deployment of broadband networks, and "infrastructure projects" are defined as any

activity related to the construction, alteration, maintenance, or repair of infrastructure in the United States regardless of whether infrastructure is the primary purpose of the project (See 2 CFR § 184.3). To the extent that placing radios into a LEO system includes "any activity related to the construction, alteration, maintenance, or repair of infrastructure," the components used in that construction/alteration would be subject to BABA, even if the electronics were waived.

7.5. Do sub-awardees have to comply with Davis-Bacon? If not, what regulations must the sub-awardee adhere to?

Response: Sub-awardees are no longer required by the BEAD program to adhere to the Davis-Bacon federal statute. A sub-awardee can comply with Davis Bacon statute if they wish. If a sub-awardee does not wish to adhere to the Davis-Bacon statute, they must provide a project employment and local impact report detailing the number of contractors, employees on the project, wages and benefits of workers, and whether those wages are less than those prevailing. For more details, visit the ConnectMT website to view the BEAD Grant Agreement and Exhibits.

7.6. How long will subgrantees have to complete construction?

Response: Subgrantees will have 4 years from the date the agreement with the State is fully executed to complete construction.