

## **Idaho BEAD Program Volume II Updates Summary**

### **1) Subdividing Tribal Reservations into Multiple APAs.**

- Which Volume of the IP does the request impact?
  - Volume II
- What is the question number the request impacts (found in the intake summary from the NGP i.e. 2.4.6)? Please summarize the correction or change being requested.
  - Redline version attached. See Section 2.4, Subsection 5.1, Page 37 and Section 2.4.6, Page 53.
- What is the Eligible Entity's justification for the request?
  - When the IOB initially conducted tribal outreach in 2023, the 5 federally recognized tribes of Idaho requested that Tribal Application Project Areas (APAs) comprise a single APA all within the tribal reservation boundaries. However, after the Idaho BEAD APA Map 1.0 was published, the Nez Perce Tribe and IOB recognized that a single APA for the entire reservation was too large, both in geographic area and number of eligible BSLs. Through conversation and collaboration, the IOB and Nez Perce Tribe came to the solution of breaking the Tribal APA into multiple APAs, so the Nez Perce Tribe presented an outcome that best fits their needs, goals and objectives and resulted in multiple Tribal APAs, but all within the tribal boundaries. Further, since this discussion, the Coeur d'Alene Tribe is going through the same exercise by dividing their tribal APA into multiple.

### **2) Low-cost AND middle-class affordability: remove 4% cap on Consumer Price Index increases.**

- Which Volume of the IP does the request impact?
  - Volume II
- What is the question number the request impacts (found in the intake summary from the NGP i.e. 2.4.6)? Please summarize the correction or change being requested.
  - Redline version attached. See Section 2.12.a, Page 107 and Section 2.13, Page 112.
- What is the Eligible Entity's justification for the request?
  - In collaboration with ISP stakeholders, the IOB is requesting this change, because if the Consumer Price Index adjusts in an amount that exceeds 4%, the IOB does not want to use regulatory control over private industry as it relates to pricing. For example, if the Consumer Price Index suggests a 10% price increase, the IOB only allowing ISPs to increase prices by 4% would negatively impact business plans/models.

**3) Remove performance benchmark aligning with FCC speeds threshold and simply lock in at 100/20Mbps.**

- Which Volume of the IP does the request impact?
  - Volume II
- What is the question number the request impacts (found in the intake summary from the NGP i.e. 2.4.6)? Please summarize the correction or change being requested.
  - Redline version attached. See Section 2.12.b, Page 107.
- What is the Eligible Entity's justification for the request?
  - In collaboration with ISP stakeholders, the IOB is requesting this change, because the language mandates adherence to a policy that can fluctuate; therefore, creating unknowns for potential BEAD applicants and negatively impacting planning. In support of the State's ISPs and the planning of resident connections, locking in the network speed minimums enhances confidence in the BEAD Program as well as an applicant's ability to plan. Establishing base line minimum speeds of 100/20Mbps is a clear standard and familiar to the ISP community.

**4) Professional Engineering License.**

- Which Volume of the IP does the request impact?
  - Volume II
- What is the question number the request impacts (found in the intake summary from the NGP i.e. 2.4.6)? Please summarize the correction or change being requested.
  - Redline version attached. See Section 2.4.13, Page 70.
- What is the Eligible Entity's justification for the request?
  - This change brings Volume II into alignment with NTIA guidance released after the Initial Proposal was submitted for review/approval. The State of Idaho is not in the business of implementing restrictive policies and this change will alleviate stakeholder concerns regarding workforce issues and access to affordable, reliable engineers. See NTIA Notice of Programmatic Waiver, 3/7/24, [here](#).

**5) Scoring Matrix: Affordability under Primary Criteria on the FTTH end-to-end scoring matrix (Technical Correction).**

- Which Volume of the IP does the request impact?
  - Volume II

- What is the question number the request impacts (found in the intake summary from the NGP i.e. 2.4.6)? Please summarize the correction or change being requested.
  - See FTTH end-to-end scoring matrix.
- What is the Eligible Entity's justification for the request?
  - Upon examination, the IOB has noted that there is a missing "rung on the ladder" within the affordability section. There should be a line worth 12.5pts for "Monthly service cost 1Gbps/1Gbps \$70.00-\$79.99."

**6) Multiple APAs within one application, multiple applicant applications per APA and APA cost benchmarks (Technical Correction).**

- Which Volume of the IP does the request impact?
  - Volume II
- What is the question number the request impacts (found in the intake summary from the NGP i.e. 2.4.6)? Please summarize the correction or change being requested.
  - Redline version attached. See Sections 2.4.1 and 2.4.2, Pages 46-48.
- What is the Eligible Entity's justification for the request?
  - This is a technical correction as the IOB's strategy and commitment to stakeholders throughout outreach/engagement activities was to make the application process flexible and to avoid a one-size-fits-all approach. The State's intention has always been to allow for multiple APAs within one application and multiple applications from an applicant for one APA. Therefore, this change is aligned with the IOB's intent and pledge to stakeholders.
  - APA cost benchmark language was unintentionally included as there was never intent within the State's policy or amongst stakeholders that APA cost benchmarks would be identified prior to the funding application phase. Idaho will establish an Extremely High Cost Per Location Threshold (EHCPLT) after the funding application phase has ended.

**7) Prequalification application Scoring Clarification (Technical Correction).**

- Which Volume of the IP does the request impact?
  - Volume II
- What is the question number the request impacts (found in the intake summary from the NGP i.e. 2.4.6)? Please summarize the correction or change being requested.
  - Redline version attached. See Section 2.4, Subsection 5.4, Page 38.

- What is the Eligible Entity's justification for the request?
  - This is a technical correction. The Prequalification/LOI materials are not formally scored during the Prequalification Application Phase as the process is simply pass/fail. However, some materials are considered during the scoring of the Funding Application. Applicants will have an opportunity to update documents, such as financials, but will not be required to resubmit. This was clearly explained during stakeholder outreach and engagement activities.

## **8) Legal Citations (Technical Correction).**

- Which Volume of the IP does the request impact?
  - Volume II
- What is the question number the request impacts (found in the intake summary from the NGP i.e. 2.4.6)? Please summarize the correction or change being requested.
  - Redline version attached. See Section 2.4.1, Pages 33-34
- What is the Eligible Entity's justification for the request?
  - This is a technical correction. The correct Idaho Code Section has been updated. Idaho Public Records Act is Title 74, Idaho Code.

## **9) Subgrantee Financials: For Pro Forma forecasts, change from 3yrs to 10yrs (Technical Correction).**

- Which Volume of the IP does the request impact?
  - Volume II
- What is the question number the request impacts (found in the intake summary from the NGP i.e. 2.4.6)? Please summarize the correction or change being requested.
  - Redline version attached. See Section 2.4.11, Page 63 and 64.
- What is the Eligible Entity's justification for the request?
  - This is a technical correction. The Pro Forma forecast section mistakenly states 3 years, not 10 years as referenced across the document. This change simply brings the section into alignment with the rest of the State's policy.

**10) Funding Application Curing Days (Technical correction).**

- Which Volume of the IP does the request impact?
  - Volume II
- What is the question number the request impacts (found in the intake summary from the NGP i.e. 2.4.6)? Please summarize the correction or change being requested.
  - Redline version attached. See Section 2.4, Subsections 5.72 and 5.8, Page 45-46.
- What is the Eligible Entity's justification for the request?
  - This is a technical correction. This change brings the curing timelines into alignment with each other and adds clarity. Change from 5 to 10 calendar days for curing of Funding Application.

**11) Useful life of the broadband infrastructure/asset (NTIA correction).**

- Which Volume of the IP does the request impact?
  - Volume II
- What is the question number the request impacts (found in the intake summary from the NGP i.e. 2.4.6)? Please summarize the correction or change being requested.
  - Redline version attached. See Section 2.12(b), Page 107 and Section 2.16.2(d), Page 119.
- What is the Eligible Entity's justification for the request?
  - This is a correction identified by NTIA. This change brings the life of the asset and broadband infrastructure into alignment with the BEAD Program's requirements. All references to useful life and/or program obligations will be changed from 8 years to 10 years.