

KIM REYNOLDS, GOVERNOR
ADAM GREGG, LT. GOVERNOR

MATT BEHRENS, INTERIM, DIRECTOR &
CHIEF INFORMATION OFFICER

Addendum #2 to NOFA #007
Written Responses to Questions
Oct 25, 2021

Disclaimer: The Office has endeavored to recreate the questions submitted during the Written Question and Answer window verbatim, or as they were received from the submitting party. Be advised, however, that some questions may have been slightly modified as deemed necessary by the Office in the interests of brevity and/or clarity, or to otherwise protect the identity of the submitting party.

1. Project Design

Q1.1 Paragraph 3.1.6.2 in describing “Latency” for purposes of the quantitative application scoring references the “router specified by and as measured by the Internet Speed Test Tool, upon Project completion.” What does this mean from a service provider perspective, is there any flexibility as to the Internet Speed Test Tool used and the “router specified” used as the latency testing end point?

A1.1 In reviewing this question, the Office discovered an omission in the language for NOFA #007 (“NOFA”) section 3.1.6.2. A revised Exhibit A has been posted in connection with this NOFA that amends section 3.1.6.2 as follows:

3.1.6.2 SubCategory 2 - Latency. “Latency” means the average time it is estimated to take, expressed in milliseconds (ms), for data to travel from the customer edge router ingress/egress point to the “Internet Speed Test Tool” published at <http://iowa.speedtestcustom.com/>. Applicants must respond to this question by providing the anticipated Latency the customer will experience as measured by the Internet Speed Test Tool from the customer location upon subscribing to the proposed service upon Completion Date.

Applicants are strongly encouraged to download the revised NOFA #007 Exhibit A posted online on October 25, 2021.

Q1.2 If an applicant has a project which has middle-mile facilities running through non-ESAs because of end-user locations, would the OCIO be willing to discuss the “appropriateness” of the middle-mile facilities prior to submitting the final project?

A1.2 Middle-mile facilities are eligible expenditures provided that they are necessary for the Applicant to Facilitate Covered Speeds within Eligible Service Areas (“ESAs”). See NOFA section 1.2.3.2. Wherever such middle-mile facilities are geographically located outside of ESAs, Applicants must identify such expenditures on Exhibit D.1 Outside Eligible Service Area Infrastructure Worksheet. Applicants must also answer all accompanying questions on Exhibit D.1 concerning outside Eligible Service Area costs including questions related to the necessity of such expenditures.

Q1.3. If a road or street has an ESA (Eligible Service Area) census block on one side of the road and an ineligible census block area on the opposite side of the road, is a broadband provider required to plow/knife mainline fiber on the same side of the road that has the ESA in order to receive funding for the mainline fiber?

A1.3 There is no requirement that project build-out occur only within the ESAs, however any estimated or actual expenditures outside ESAs must be necessary for the purpose of Facilitating Covered Speeds to ESAs. See NOFA section 1.5.2.2 for the Outside Eligible Service Area Infrastructure Process. Any expenditures that are geographically located outside ESAs must be defined in Exhibit D.1.

Q1.4 Can applicants assume that if the mainline fiber is on the ineligible area side of the road, fiber “drops” to HSBs within the ESA across the road would still be considered eligible for fundings, and obviously drops to HSBs within non-ESA areas would not be funded. Please confirm.

A1.4 That is correct. See response to Q1.3.

Q1.5 Are locations provided?

A1.5 The Office is unable to determine what is meant by “locations” in the context of this question.

Q1.6 Are there design requirements other than (100/20 with a path to 100/100) and future proof backhaul?

A1.6 NOFA section 1.5 (Project/Total Project Costs) may be referenced for project requirements.

Q1.7 Is there a requirement for % locations or # of locations to be served?

A1.7 A minimum number of locations to be served is not required, but will impact scoring. See NOFA Section 3 (Methodology).

Q1.8 Can we use ROW (right of way)?

A1.8 There is no limitation concerning the use of ROW imposed by the Office. However, all Applicants should consult local and state regulations regarding the laws for use of Right of Ways.

Q1.9 Is the operator able to use ROW (i.e. CLEC?) and can utilize pole rights?

A1.9 See response to Q1.8.

Q1.10 Will this require optical – end-to-end solution? (i.e. head end, PON equipment)?

A1.10 An engineer should be consulted regarding project design requirements. NOFA #007 does not require the deployment of fiber, however projects that Facilitate fiber optic service may score higher.

Q1.11 Are there existing assets we can utilize in the build? Fiber?

A1.11 Applicants can utilize previously purchased materials as long as they meet the requirements set forth in section 1.2.3 of the NOFA (Allowable Expenditures). Materials purchased outside of the permissible timeframes for NOFA expenditures may be used, but cannot be reimbursed through the NOFA.

Q1.12 Is there a % that the operator can “give back” that are hard to reach? (seems like it’s 100% coverage)

A1.12 Grantees will be expected to build out service to the number of homes, schools, and businesses (“HSBs”) identified within the Census Block in Exhibit B in the columns labeled “Total Number of Broadband Units New Service Will Be Facilitated To.” This number represents the quantity of HSBs the Applicant proposes to deliver new service to. This number can be the same, higher, or lower than the number of HSBs reported to exist within the Census Block as identified in the columns labeled “Total Number of Broadband Units in Project Area.” NOFA section 3.1.4.

Q1.13 If we receive funding for an eligible block, are we required to build out service to the entire block?

A1.13 See response to Q1.12.

2. Project Completion

Q2.1 What is the latest allowed project date for delivering 100/20 service for NOFA 007? What is the latest allowed project date to deliver 100/100 service for NOFA 007?

A2.1 Applicants will be expected to complete their Project by the Completion Date proposed in their Application, but no later than September 30, 2026 regardless of the speed proposed. For Projects proposing 100/20 speeds, the Project must be scalable to a minimum of 100/100 within three years of Project Completion.

Q2.2 Supply chain issues are a huge concern for service providers. How are supply chain problems to be addressed? Paragraph 1.3 of NOFA #7 states that “[g]rantees will be expected to complete their Projects by [the] represented Completion Date”. How will unknowns as to impact of supply chain delays or shortages be considered, if a winning applicant is unable to complete a project within their proposed completion timeline due to supply deficiencies?

A2.2 Applicants will be expected to complete their Project by the Completion Date proposed in their Application, but no later than September 30, 2026. Applicants are advised not to apply to this NOFA if they do not reasonably believe buildout can occur by that date. The Office is unable to make any guarantees as to the availability of future extensions as the permissibility of extensions is relegated to the purview of the Federal government. The Office will be checking in with Grantees periodically as to the status of the project throughout the term of the Agreement so that the Grantee can keep the Office apprised of any delays as they occur.

Q2.3 While it is stated that any projects initially built to 100/20 speeds must be scalable to 100/100 within 3 years of project completion, what is the construction deadline for any 100/100 projects?

A2.3 All Projects including 100/100 Broadband and 100/20 Broadband Projects must be fully completed by September 30, 2026 to receive funding under this NOFA. Service must be Facilitated to HSBs at 100/100 Broadband or 100/20 Broadband speeds, as applicable, by the earlier of this date or the Project Completion date

provided by the Grantee as part of its Application. See NOFA section 1.3 (Project Period/Contract Term). 100/20 Broadband Projects then have three years from the date of Project Completion to scale to 100/100 Broadband.

3. Core Application

Q3.1 Are census blocks with 0 homes, schools or businesses to be included on the ESA Input tab to be updated to Exhibit B?

A3.1 Any census blocks within which Covered Speeds will be Facilitated as part of a proposed project should be included in Exhibit B. Applicants may include Census Blocks with zero reported HSBs. However, Applicants will be expected to have the ability to Facilitate service within any zero HSB Census Block included in the project, meaning that Covered Speeds could be Facilitated to a HSB within the census block within a commercially reasonable time and for a commercially reasonable price.

Q3.2 Exhibit C 1.3 asks for the Monthly Recurring Cost to consumers, is this for the facilitated speed entered into the Menu tab of the core application or does this refer to the speed that is entered into Exhibit B?

A3.2 Please state the Monthly Recurring Cost to the consumer of the 100 megabits per second download and 100 megabits per second upload or 100 megabits per second download and 20 megabits per second upload, as applicable, product that the Applicant is minimally required to offer. This product is based on the Facilitated Speeds Project identified in the Menu tab of the Core Application (100/100 or 100/20).

Q3.3 With the way the economy is right now and the cost of materials, it is hard to determine what actual 2022 material costs will be. In providing numbers on Exhibit D, Budget Plan, is it acceptable to enter numbers that may be higher than what the actual material costs will be? The concern is with the fluctuation in prices in today's economy, it is hard to know what 2022 prices will be (and may be much higher in 2022 than they are today).

A3.3 The development of the Budget Plan is based on the identification of Allowable Expenditures which are more fully explained in NOFA section 1.2.3 (Allowable Expenditures). An Applicant may identify costs in their Budget Plan that are based on their best approximation of costs that will be incurred during the period of performance of their Project.

4. "CSLFRF" Federal Requirements

Q4.1 If service providers are performing some of the work internally by using their own staff, are those labor rates allowed to be used in the project costs for Exhibit D? 1.2.3.10 mentions passthrough expenditures but what are arm's length transactions?

A4.1 Please identify all Allowable Expenditures that will be incurred during the period of performance of the Project. This can include internal staff labor costs. Applicants/Grantees may only be reimbursed for Allowable Expenditures as defined in Section 1.2.3.

Expenditures that are not the result of an arm's length transaction are Disallowed Expenditures. An Arm's Length transaction is one in which assets or labor are acquired at fair market value with an unrelated third party. 2 CFR 200.449(c)(2).

Q4.2 For projects at \$10,000,000 or over is the U.S. Department of Treasury reporting based on a per application or per company?

A4.2 The reporting requirements are based on the Total Project Costs identified in the project application's Budget Plan. Total Project Cost means the total costs/expenditures comprising a Project, and for which Applicants/Grantees may seek reimbursement from the Office. NOFA section 1.5.2 (Total Project Costs).

Q4.3 Is the \$10M limit based on per project cost or per applicant?

A4.3 There is no \$10 million dollar limit imposed on applicants or applications. See NOFA section 1.6 (Available Funds) for additional information. However, a Project awarded funding in this NOFA with a Total Project Budget of \$10 million dollars or more will be required to undergo additional reporting requirements as further described in NOFA section 2.2.3.5.

Q4.4 Since Federal funding is involved will Davis Bacon laws be in effect for these awards with associated record keeping requirements?

A4.4 The Davis-Bacon Act requirements (prevailing wage rates) do not apply to projects funded solely with award funds from the CSFRF/CLFRF program, except for CSFRF/CLFRF-funded construction projects undertaken by the District of Columbia. Treasury has indicated in its Interim Final Rule that it is important that necessary investments in water, sewer, or broadband infrastructure be carried out in ways that produce high-quality infrastructure, avert disruptive and costly delays, and promote efficiency. Treasury encourages recipients to ensure that water, sewer, and broadband projects use strong labor standards, including project labor agreements and community benefits agreements that offer wages at or above the prevailing rate and include local hire provisions, not only to promote effective and efficient delivery of high-quality infrastructure projects, but also to support the economic recovery through strong employment opportunities for workers. Using these practices in construction projects may help to ensure a reliable supply of skilled labor that would minimize disruptions, such as those associated with labor disputes or workplace injuries. Treasury has also indicated in its reporting guidance that recipients will need to provide documentation of wages and labor standards for infrastructure projects over \$10 million, and that these requirements can be met with certifications that the project is in compliance with the Davis-Bacon Act (or related state laws, commonly known as "baby Davis-Bacon Acts") and subject to a project labor agreement. See <https://home.treasury.gov/system/files/136/SLFRPFAQ.pdf> for additional information.

Q4.5 On Exhibit L, in order to answer the "Affordability Offering" is there a direct link to a site that states what is considered to be "affordable" (I was unable to locate this information on the Treasury link provided on this exhibit)? Or, is this based on the broadband data listed in the "2021 Urban Rate Survey for Fixed Voice and Broadband Service (WC Docket No. 10-90)"?

A4.5 The Office is unable to provide a definition of "affordability offering" except to reference the location where the U.S. Department of Treasury sets forth the requirement (U.S. Department of Treasury Compliance and

Reporting Guidance for Coronavirus State and Local Fiscal Recovery Funds, Part 2, Section B Project and Expenditure Report, Subsection 3 Required Information, Part h Required Programmatic Data for Infrastructure Projects (EC 5), Item 3 All Broadband Projects; *see* <https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/state-and-local-fiscal-recovery-funds/recipient-compliance-and-reporting-responsibilities>).

Q4.6 Does the additional reporting apply to the Total Project Costs of \$10,000,000 for each application or the total of all applications by one company? In other words, can one company make multiple applications, each under the \$10,000,000.00 but in total they exceed the amount, would they be required to do additional reporting for each of the application awards?

A4.6 See response to Q4.2. Additionally, the Grantee may be required to complete additional reporting on a project that incurs costs equal to or greater than \$10,000,000 during the period of performance. Applicants that choose to subdivide projects in order to avoid reporting requirements may want to seek additional guidance directly from the Department of Treasury on how reporting requirements may be applied.

5. Eligible Areas / Previously-Funded Areas / Map

Q5.1 How can the OCIO and reputable Iowa broadband providers work together to disavow areas where speeds are overstated by a few broadband providers, and make those areas grant eligible for the purposes of this program? [W]hat processes are in place to affirm that the stated speeds by a few broadband providers are not just a defensive competitive tactic, and thus allow reputable broadband providers to apply for these grant programs and deliver 100/100 speeds to all Iowans?

A5.1 The Office offers a challenge/appeal period to the Iowa Broadband Map (“Map”) when it updates and publishes it, at least annually. Version 4 (“V4”) of the Map was published on July 1, 2021, and an appeal period was held immediately following, the result of which is the Map as it is reflected today at <https://ocio.iowa.gov/broadband-availability-map-version-4>.

Eligibility requirements for this NOFA are in accordance with U.S. Dept. of Treasury requirements and differ from previous NOFAs. For purposes of this NOFA, ESAs exclude consideration of wireless networks and the eligibility threshold is set at 25/3, thereby expanding eligible areas for funding.

Q5.2 If the map reflects a subscriber served at 100/100 and other subscribers in the block are unable to get that same service is the entire census block declared served?

A5.2 A Census Block is considered unserved or underserved when 10% or less of the geographic area receives Facilitated wireline service at 25/3 broadband speeds or faster as reported on Map V4.

Q5.3 [Provider] is in the final stages of our fiber to the premise project that encompasses an area shown as eligible for NOFA #7 funding. We are providing fiber optic technology with up to 200/200 speed offering. We want to prevent funding being awarded for another service provider who may think this area is underserved. Please advise on action we should take to report the exact areas being served.

A5.3 The Office's data source for eligible areas is Map V4 which reflects Facilitated service as of July 1, 2021. The Office is unable to make changes to the Map or republish data outside of the period allotted for such changes. If the Office is aware of a portion of a Project overlapping with an area in which construction has commenced or pre-existing Broadband commitments, the Office may disqualify the Application. NOFA section 1.9.2-3.

Q5.4 What is the basis (data source) of the map for the areas that are determined as "Eligible Service Areas" for NOFA 007?

A5.4 The basis of the eligibility areas for this NOFA is Map V4. The Office used data reflected on that map to determine eligible areas in accordance with the requirements set by the U.S. Dept. of Treasury. Eligible areas can be identified by adding the layer to the Map called NOFA #007 Eligible Service Areas. An ESA means a Census Block identified on the Map as a Census Block within which no provider offers wireline service at speeds greater than or equal to 25/3 Broadband consistent with the Coronavirus State and Local Fiscal Recovery Funds requirements established by the U.S. Department of Treasury. NOFA section 1.2.12.

Q5.5 Will the areas we applied for in NOFA006 be available TSAs for grant funds in NOFA007?

A5.5 Areas funded under NOFA #006 or any prior NOFA issued by the Office may appear as ESAs. However, ESAs that received funding for 25/3 wireline buildout or faster will be excised from Applications before awards are made. Areas that were applied for under NOFA #006 or any previous NOFA, but were not awarded funds by the Office, will not be excised from Applications under NOFA #007 on the basis that previous state incentives were provided for such blocks. See Q5.1 for more information about the map.

Q5.6 Can you confirm whether census blocks that were previously funded by federal programs would be considered eligible census blocks, or would this overlap necessitate that these blocks be omitted from the project and application for it to be eligible?

A5.6 See response to Q5.13.

Q5.7 May we submit applications for projects that are already in progress as long as the costs were paid after March 3, 2021?

A5.7 While Allowable Expenditures may date back to March 3, 2021, the Office may disqualify an application or offer a partial award where a portion of a project overlaps with an area in which any Communications Service Provider has already commenced construction or buildout, where a Communications Service Provider has preexisting Broadband expansion commitments, or where a Project will proceed regardless of whether funds are awarded. See NOFA section 1.9 (Rejection/Disqualification or Cancellation of NOFA) and 1.6.4 for partial award amount determinations.

Q5.8 If you have a project that started after the 3/3/2021 date, can the eligible costs be attributed to NOFA #7? An example would be; We placed 3000 fibers in an ineligible area but 500 fibers are required to build out the rural that is included in NOFA #7. 500 fibers represents 16.6% of the 3000. Say the 3000 fibers cost is 5M, 16.6% of the 5M is \$830,000.00. 60% of the \$830,000 is \$498,000. Can we apply this to the NOFA #7?

A5.8 See response to Q5.7.

Q5.9 Section 2.d of the SLFRF Compliance and Reporting Guide states: *Investments in Water, Sewer, and Broadband: Recipients may use SLFRF award funds to make necessary investments in water, sewer, and broadband. Recipients may use SLFRF award funds to cover costs incurred for eligible projects planned or started prior to March 3, 2021, provided that the project costs covered by the SLFRF award funds were incurred after March 3, 2021.*

Does this mean that the NOFA 007 funding will be available to those who have started projects that have incurred costs since March 3, 2021? For example, if a Telecommunications Provider has started construction of a FTTH network in January 2021- can they apply for this grant for the costs of the project incurred since March 3, 2021?

A5.9 See response to Q5.7.

Q5.10 If an applicant wants to file for a census block(s) and has not been awarded any federal funding for those blocks is that entity able to apply for those block(s)? Would that be possible if another entity had federal funding for those same block(s). In other words is any Federal funding awarded for a census block(s) enough to exclude any applicant or just those holding that funding award?? If the entity that has the Federal funding is a wireless provider does that change any portions of the answer.

A5.10 See response to Q5.13.

Q5.11 Could you please give some guidance on how we should proceed with the RDOF areas that were awarded to AMG and LTD as they have not been authorized as of yet and I believe that they both filed for mixed technologies (both Fixed Wireless and Wireline). Should these areas be included in the NOFO #7 Applications?

A5.11 See response to Q5.13.

Q5.12 For NOFA #7, the OCIO office wants to make sure that we do not have any census block in our application that was awarded through RDOF... Correct?

A5.12 See response to Q5.13.

Q5.13 Regarding census block eligibility if Federal funding was previously awarded through mechanisms such as CAF II or RDOF – Are blocks eligible for NOFA #007 funding if the previously announced Federal awards are still under review and may potentially be flagged in default under those programs?

A5.13 ESAs were identified by the Office as those Census Blocks meeting the baseline eligibility criteria established by the U.S. Department of Treasury for use of ARP CSLFRF funds. That guidance indicates that “projects must also be designed to serve unserved or underserved households and businesses, defined as those that are not currently served by a wireline connection that reliably delivers at least 25 Mbps download speed and 3 Mbps of upload speed” (see Section 6.5, Coronavirus State and Local Fiscal Recovery Funds Frequently Asked Questions As of July 19, 2021 published at <https://home.treasury.gov/system/files/136/SLFRPFAQ.pdf>.)

ESA determinations under this NOFA do not turn on whether a Census Block has been previously-funded under a federal or state program. ESA determinations turn only on whether a provider Facilitated wireline 25/3 broadband or faster as of July 1, 2021 as reported on Map V4. “Eligible Service Area” means a Census Block identified on the Broadband Availability Map as a Census Block within which no provider offers wireline service at speeds greater than or equal to 25 megabits per second download and 3 megabits per second upload (“25/3 Broadband”) consistent with the Coronavirus State and Local Fiscal Recovery Funds Requirements established by the U.S. Department of Treasury.

The ESAs identified by the Office in Map V4 are therefore a starting point for understanding which locations in Iowa lack access to wireline 25/3 broadband and thus can be submitted as part of an Application to this NOFA. However, there are additional factors that may impact whether an ESA will receive funding under this NOFA consistent with other guidelines established by the U.S. Department of Treasury or this NOFA.

NOTE: There are many reasons that an ESA may be disqualified from receiving funds under this NOFA.

Some ESAs may not receive funding under this NOFA because prior federal or state incentives that meet certain conditions were previously awarded in those areas. For funding awarded by the Office under previous NOFAs to build wireline 25/3 service or faster, the Office has provided the Previous Funding Layer on Map V4 to assist applicants in identifying ESAs that will be disqualified. See response to Q5.18 for more information. Previous Federal Funding Awards are not displayed in this layer. Areas that have received federal funding awards not issued by the Office may also be removed where buildout will result in wireline 25/3 service or faster.

The Office will review all applications for overlap with prior incentives including state and federal awards of funding, where such information is available, that will result in buildout out of wireline service at speeds of 25/3 or faster. These areas will be excised from Applications before making final awards consistent with NOFA section 1.6.4.4. This will result in a reduced award that does not include funding for buildout in any excised areas. Additionally, Applicants will also be asked to certify, to the best of their knowledge, that neither the Applicant nor any other known Communications Service Provider or other entity has been awarded federal funds for the construction of 25/3 wireline broadband or faster, which funds may include but are not limited to RDOF, ACAM, or other sources of federal funding, for previous or current Broadband infrastructure projects in the Eligible Area(s) forming this basis of Applicant's proposed Project.

Q5.14 If the Federal award for a given census block does not meet the 100M/100M NOFA #007 speed obligation, is that census block still eligible for funding from NOFA #007? For example, CAF II recipients who were successful with bidding at baseline speeds are only required to provide 25M/3M speeds, and recipients that bid at “above-baseline” speeds are only required to provide 100M/20M speeds to meet their obligations.

A5.14. See response to Q5.13.

Q5.15 In the map of eligible service areas for NOFA #007, non-wireline (fixed wireless & satellite) providers were removed in determining census block eligibility, yet we heard on the pre-application conference that areas awarded support in the 903 & 904 auctions would be ineligible for NOFA #007 support. Could you please confirm that awards in the 903 & 904 auctions going to non-wireline (fixed

wireless & satellite) providers will not preclude an area from being eligible in NOFA #007 since those same non-wireline providers service areas were removed in determining the map of eligible service areas?

A5.15 Verbal responses given during the Pre-Application Conference are non-binding on the Office. NOFA 1.7.2.1. Further, see response to Q5.13.

Q5.16 **Would you please clarify that those areas in the 904 Auction that were technically won but still pending FCC authorization (10 months after the auction closed) are still eligible areas for NOFA #007 support?**

A5.16 See response to Q5.13.

Q5.17 **Would you explain your mission to not overbuild federally funded broadband projects?**

We also are interested to know why you say that CAF and RDOF winners need not apply to your NOFA?

A5.17 Under the Interim Final Rule, eligible projects are expected to focus on locations that are unserved or underserved. The interim final rule treats users as being unserved or underserved if they lack access to a wireline connection capable of reliably delivering at least minimum speeds of 25/3. In selecting an area to be served by a project, recipients are encouraged to avoid investing in locations that have existing agreements to build reliable wireline service with minimum speeds of 100 Mbps download and 20 Mbps upload by December 31, 2024, in order to avoid duplication of efforts and resources. Coronavirus State and Local Fiscal Recovery Funds, Interim Final Rule, 86 Fed. Reg. 26805-6. Additionally, see response to Q5.13.

Winners of CAF and RDOF funding may not request funding under this NOFA to build out in the same areas for which they were awarded funds under CAF and RDOF.

Q5.18 **We understand that previously awarded areas are not eligible in NOFA #7, what if awarded areas were to wireless carriers that cannot get to the 100/100? If they are eligible, how can we tell if the census block award was to a wireless carrier?**

A5.18 See response to Q5.13 for more information. Applicants are encouraged to conduct their own research concerning federal funding sources, paying special attention to federal funding that will result in the buildout of 25/3 wireline service or faster. ESAs that have received such funding should be omitted from Applications before submission to the Office. The Office will take all available steps to excise such ESAs from Applications before Awards are issued. However, in the event areas funded by certain disqualifying previous federal awards are also awarded by the Office under this NOFA due to a lack of publicly-available federal award data or for any other reason, the U.S. Department of Treasury may find of its own accord that disqualifying duplication exists, and take action to recover the award funds. All awards are subject to federal review and applicable clawback provisions that pertain to funding areas that may have already been federally-funded.

Q5.19 **Is 5G an eligible service under this program if it meets 100/100 requirements?**

A5.19 All technologies must meet the eligibility requirements set forth in section 1.4 of the NOFA. Applicants are strongly encouraged to review all guidelines established by the U.S. Department of Treasury in making a determination concerning the eligibility of any technology type.

Q5.20 Is LoRaWAN an eligible broadband service for this grant program?

A5.20 See response to Q5.19.

Q5.21 I was also wanting clarification on eligible areas for NOFA7 in regards to previously funded areas. Our area has some blocks awarded to a fixed wireless company from RDOF. Are these blocks still eligible?

A5.21 See responses to Q5.3 and Q5.13.

Q5.22 There was a question on the NOFA 7 pre-conference call about whether RDOF awards to fixed wireless carriers will be ineligible for NOFA 7 funding. I would like to ask that same question, but also ask, what if these RDOF awardees have not yet been final awarded (i.e. their long form applications have not been final approved, so they have not been authorized to receive disbursements). I ask this question because large swaths of the state were awarded to wireless carriers in the RDOF auction, once these are identified, our concern is much of the NOFA 7 eligible areas currently on the map will disappear from eligibility.

A5.22 See response to Q5.13.

Q5.23 Also, can you please confirm specifically that areas which are eligible in NOFA 7 because there is no 25/3 wireline provider, and which were awarded to Western Iowa Wireless, a fixed wireless provider, in NOFA #002, may be included in an application and will be eligible for award funds?

A5.23 See response to Q5.18.

Q5.24 Are the NOFA 007 eligible areas identified in the Map v4 that overlap with FCC Auction 904 RDOF winning bids eligible for NOFA 007 grants?

A5.24 See response to Q5.13.

Q5.25 Are the NOFA 007 eligible areas identified in the Map v4 that overlap with FCC Auction 904 RDOF fully authorized winners eligible for NOFA 007 grants?

A5.25 See response to Q5.13.

Q5.26 Are the NOFA 007 eligible areas identified in the Map v4 that overlap with FCC Auction 903 CAF II Auction authorized winners eligible for NOFA 007 grants? If yes, does it depend on the speed/latency threshold of the winning bid?

A5.26 See response to Q5.13.

Q5.27 Are the NOFA 007 eligible areas identified in the Map v4 that overlap with ACAM I supported areas eligible for NOFA 007 grants?

A5.27 See response to Q5.13.

Q5.28 Are the NOFA 007 eligible areas identified in the Map v4 that overlap with ACAM II supported areas eligible for NOFA 007 grants?

A5.28 See response to Q5.13.

Q5.29 Are the NOFA 007 eligible areas identified in the Map v4 that overlap with USDA ReConnect and/or Community Connect areas eligible for NOFA 007 grants?

A5.29 See response to Q5.13.

Q5.30 Are the NOFA 007 eligible areas identified in the Map v4 that overlap with NTIA BIP supported areas eligible for NOFA 007 grants?

A5.30 See response to Q5.13.

Q5.31 Are the NOFA 007 eligible areas identified in the Map v4 that overlap with USDA protected borrower areas eligible for NOFA 007 grants?

A5.31 See response to Q5.13.

Q5.32 If an RDOF auction winner was disqualified, will the census blocks they were provisionally awarded be eligible service areas and available for funding in the NOFA 7 grant program?

A5.32 See response to Q5.13.

Q5.33 We have a client that received a ReConnect loan/grant to build out the rural area around their exchange. The ReConnect loan/grant was approved in March 2019. However, it has taken just under two years to deal with environmental and historical sites issues on the application. This delay was the result of the USDA being unable to resolve the issues in a timely manner. This has effected a number of other phone companies that received ReConnect funding as well. This has delayed our ability to place material orders and the put construction contract in place until just recently. With the massive influx of funds to build-out broadband infrastructure, the cost of labor and materials have increased any where between 20% to 48%. These increases have resulted in the estimated total cost of the project increasing by 31.5%. Can NOFA #007 funds be used to help offset the increase in cost to the project?

A5.33 No. The Office will not consider funding projects that have pre-existing commitments from federal programs to complete wireline 25/3 Broadband or faster service buildout. For additional information see NOFA sections 1.6.4.2 and 1.6.4.3.

Q5.34 Are previously awarded areas eligible for submission for NOFA 7? Does this apply to all previously awarded areas or only those awarded for specific previous NOFAs?

A5.34 See response to Q5.13.

Q5.35 Which federal broadband funding programs are excluded? RDOF, CAF2, Reconnect etc. CAF2 had a minimum speed of 10/1, so should we only exclude CAF2 areas where providers built to at least 25/3?

A5.35 See response to Q5.13.

Q5.36 How should we treat prior federal awards that partially overlap eligible census blocks? Is the entire block considered eligible, or just the portion that overlaps the federal award. If partial, how does that impact the completeness scoring metric?

A5.36 Partial overlapping blocks will be treated the same way as full overlapping blocks. See response to Q5.13.

Q5.37 Will there be a map layer that shows census blocks that have received those excluded federal funding?

A5.37 No.

Q5.38 Will LTD Broadband and AMG RDOF areas be eligible for NOFA 7 funding?

A5.38 See response to Q5.13.

Q5.39 For NOFA 007, do Eligible Service Areas include or exclude areas served by Fixed Wireless providers? Exhibit A states that Eligible Service Areas take into account “wireless” providers, but it is not clear whether this is referring to cellular/mobile providers, fixed wireless providers or both.

A5.39 See response to Q5.13.

Q5.40 On the map for RDOF there are many areas that are considered funded for gigabit services. Are those ineligible areas? On the map for CAFII federally funded programs there are even more areas that are considered funded for 100/20 service. Are those ineligible areas as they appear to be fixed wireless? If these areas are ineligible will the maps be updated to show previously funded areas for RDOF & CAFII federally funded areas?

A5.40 See response to Q5.13.

Q5.41 Are the areas we were awarded in [NOFA] 6 available to bid in [NOFA] 7?

A5.41 See response to Q5.5.

Q5.42 If RDOF money was awarded but then defaulted on – is the area then eligible for NOFA #7?

A5.42 See response to Q5.13.

6. Application Requirements and Resources

Q6.1 Will there be any challenge process for this NOFA other than what is mentioned in Exhibit A 7.24 and 7.25?

A6.1 No.

Q6.2 Will there be any type of "challenge" process to the applications submitted under this program?

A6.2 See NOFA section 7.24 (Appeal of Award Decisions).

Q6.3 Do you know when the webinar on NOFA #007 might be posted on the OCIO website? The links to video presentations looked clickable but did not lead to any webinars as of yesterday.

A6.3 The Pre-Application Conference will be posted the week of October 25, 2021 to <https://ocio.iowa.gov/empower-rural-iowa-broadband-grant-program-notice-funding-availability-007>.

Q6.4 During the conference call on Thursday, October 14, 2021, it was mentioned that references are preferred. Can you please provide more explanation on who the references should be from (such as vendors, engineering firm and/or customers) and the preferred format for submitting these references?

A6.4 References should be of current or previous customers or clients knowledgeable of Applicant's performance in providing services similar to the services described in the NOFA. See NOFA section 2.2.4. Applicants will be permitted to provide the name and phone number of up to three references in the Reference section of the Iowa Grants system.

Q6.5 I do not see the NOFA #7 grant opportunity information on your iowagrants.gov website. Have you not put it out there yet since it is not official until Oct. 25th, or perhaps do I have something incorrect in my profile that is not allowing me to see it? I am a returning registered user, but did not apply for NOFA #6.

A6.5 The Iowa Grants Application will be available once the application window opens October 25, 2021.

Q6.6 It does not appear that the NOFA007 application asks about a local match. As you know, in NOFA006 some applicants received a local match from a county using their ARPA allocations. Could an application do the same for this round (county provides a grant from ARPA funds to supplement the NOFA007 grant), or is that not allowable because it would essentially be using FEDERAL FUNDS (to the county, via ARPA) to match FEDERAL FUNDS (to the State via ARPA). I know there have been cases in the past where matching federal dollars with other federal dollars was prohibited.

A6.6 If a Communications Service Provider received ARPA funds from a local entity to compliment NOFA #007 awarded funds it would be permissible as long as the total funds available do not exceed the project budget.

Q6.7 Will OCIO make all applicants scoring rubrics public after notice of intent to award?

A6.7 Applicant scores will be posted to the website at <https://ocio.iowa.gov/broadband/> after the Application Review period.

Q6.8 Will OCIO make all reasons for rejection/disqualification of an application public?

A6.8 All reasons for rejection/disqualification are identified in NOFA section 1.9 (Rejection/Disqualification or Cancellation of NOFA). If an Applicant has a question regarding their application review they may contact the Office directly at ociogrants@iowa.gov.

Q6.9 Section 1.2.14. of NOFA Attachment A, defines the maximum funding request at 60% -- “Maximum Funding Request” means sixty percent (60%) reimbursement. In section 3.1.8, Federal Matching Funds Requested, seems to indicate that anything under 80% matching funds, will receive the maximum available points for that section. Can you please explain the difference in the sections?

A6.9 An eligible Project may receive up to 60% reimbursement for its Allowable Expenditures under this NOFA. See NOFA section 1.2.14. However, in order to allow the Office to more widely disburse available funds to other eligible Projects, the Office will award more points to an Application if less than the full 60% is requested for reimbursement. NOFA section 3.1.8.

Q6.10 Does the operator have to be the applicant of the grant?

A6.10 The Applicant must be the Communications Service Provider and must be the entity that will be Facilitating last-mile connection to HSBs. NOFA sections 1.4.2 and 6.1.

Q6.11 What role does the carrier play in the grant application?

A6.11 See response to Q6.10. Additionally, the Grantee is permitted to seek reimbursement for Allowable Expenditures incurred through the use of subcontractors or other third parties operating on an Applicant’s behalf. NOFA sections 1.2.3.10 and 7.11.