

**Addendum #1 to NOFA #009****Written Responses to Questions****Jul 18, 2025**

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. Mapping/Build out since BEAD Challenge Process**

**Q1.1** As we are reviewing the updated map of Eligible BSLs for the NOFA #009 - we are identifying locations that are reflected as eligible; however, they are a part of a prior NOFA project. Both the grant funded, and awardee funded locations are still showing as eligible in this current map. What is the process to ensure these locations do not get awarded funded under NOFA #009?

**A1.1** Per the IJJA Statute, eligible service locations (ESL's) for NOFA #009 are determined by the FCC Broadband Map. NOFA #009 ESL's are derived from the FCC V5 fabric and June 2024 availability data, as well as enforceable commitments to federal and state grant awards. If locations were not reported, or reported incorrectly, they may appear as ESL's on the map. DOM intends to update the map with the most recent FCC data available (likely December 2024) after the application window closes. ESL's that are subsequently reported as 'served' in the most recently available FCC data will be removed from any project that includes said ESL's.

The process to ensure these locations are ineligible for NOFA #009 funding is to complete the NOFA #009 ESL Update Form. DOM will accept submission of ESL's where service is currently available and either reported in the December 2024 BDC filing or will be reported in the June 2025 filing. In addition, DOM will accept ESLs that are non-serviceable/no structure. Please find the NOFA #009 ESL Update Form on the NOFA #009 website here: <https://dom.iowa.gov/broadband/notice-funding-availability-009>

Note that serviceable locations that could be served within 10 business days should be reported to the FCC as "served," whether the location subscribes to service or not.

Any previous grant funded locations at or above 100/20 mb/s are ineligible for NOFA #009. In some cases, locations that may fall within an awarded project area may not have been eligible at the time of a previous award but have since become eligible due to a variety of reasons (updated FCC reporting, defaulted grants, consideration

of unlicensed fixed wireless, etc). In other cases, a location may fall just outside of an awarded census block (NOFA #001 - NOFA #007). As these locations are not part of the award and had not reported as "served" to the FCC at the time of map publication, they are shown as ESL's.

If a provider was previously awarded from a State of Iowa NOFA (state enforceable commitment) and feels locations are not reflected correctly on the map, contact DOM with a list of locations to verify at [broadband@dom.iowa.gov](mailto:broadband@dom.iowa.gov). Eligibility data for NOFA #007 and #008 are taken directly from the Broadband Grants Reporting tool. NOFA #001-006 project data is taken from Census Polygons as awarded under the grant agreement.

As to entities that have considered submitting a "zero bid" for locations a provider currently serves to essentially reserve the location, the Department cannot provide legal advice and would direct that all such inquiries be directed to the service provider's legal counsel to evaluate the implications associated with submission of a "zero bid."

The office will provide a form and instructions to submit locations that are designated as eligible on the BBv6 eligibility map but are thought to be "served" or locations that do not have a broadband serviceable location. Only first-party reporting will be accepted for the purposes of reporting "served" locations.

Fabric location differences. Each BDC reporting cycle is tied to a specific version of the FCC Fabric. For instance, the current Iowa broadband map is based on FCC Fabric version 4 and FCC Availability data from June 2024. Typically, any challenges to the FCC Fabric made by March will be included in data for June availability reporting and by September for December availability reporting. The FCC BDC page has more information about the Fabric and Availability cycle (<https://www.fcc.gov/BroadbandData>)

**Q1.2** How are you addressing the outdated map information?

**A1.2** See A1.1

**Q1.3** How do we challenge locations on the NOFA #009 map that show un/underserved but have fiber access. These locations were recently built with fiber and should not be eligible for funding.

**A1.3** See A1.1

**Q1.4** How do we correct the BEAD map that shows, for example, an old, abandoned corn crib in the middle of a field, as an ESL and Unserved location? Another example is a hog barn where the landowner refused FTTH, but his farmhouse a quarter mile away has FTTH.

**A1.4** See A1.1

**Q1.5** I noticed that the csv file locations don't match the locations on map. I noticed that some locations that have been served with fiber in my two ILECs since 2012 and 2017 show on the csv file - but they don't show on the map. I did not audit too many other locations, as I thought you might have a better mechanism for comparison.

**A1.5** See A1.1

**Q1.6** If there is not a way to indicate BSLs are served, can an applicant include the locations but as for \$0 in grant funding for those specific locations?

**A1.6** See A1.1

**Q1.7** In early Spring, we submitted to the Fabric map over 600 location corrections that as of last week were not yet accounted for in the Fabric map. How can we be assured that these will be adjusted on the BEAD map to correctly show built-out FTTH locations??

**A1.7** See A1.1

**Q1.8** In Exhibit A under the section called Rejection/Disqualification or Cancellation of NOFA, there are sub-sections 1.10.6 and 1.10.7 where in summary it states that the NOFA could be disallowed/rejected/cancelled where “the project area overlaps with ESLs that other communication service providers had already commenced construction or build out”, OR “has preexisting broadband expansion commitments”. But it also states that the Applicant has to indicate these project areas. As a service provider who has commenced construction buildouts, how are NOFA #009 Applicants to know that my project has started?

**A1.8** See A1.1

**Q1.9** To ensure that funds are not granted to ESLs where projects have already commenced to serve those same ESLs without grant funding, how are service providers to inform DOM-DOIT of their expansion commitments – whether or not the service provider plans to apply for BEAD funding for nearby ESLs outside of their current project?

**A1.9** See A1.1

**Q1.10** On the new version 6 map there are some locations that we serve with fiber that are outside of our exchange. Some of these locations are showing up unserved or underserved, how do we go about changing those locations to being served?

**A1.10** See A1.1

**Q1.11** Several/many locations are in/adjacent to current NOFA projects that are underway or complete. Some locations have fiber going by them now, others might be reached with a drop and some might need a small amount of mainline fiber. NOFA #009 doesn't seem to allow us to apply to serve them because we have

already expended most of the funds needed to bring the service to that location. And yet someone else could request funds to serve them because they are listed as under/unserved. The locations in question may have not been eligible in previous NOFAs OR they are new builds since the last grant awards - which could be causing this issue. I'm interested in how you anticipate handling situations like this and it has a very big impact on if we will pursue NOFA #009 funding?

**A1.11** See A1.1

**Q1.12** There are addresses on the BBv6 Broadband Serviceable Location Eligibility Map that show up as Unserved & Underserved in our current service territory. How do we challenge/ remove these ESLs from this map?

**A1.12** See A1.1

**Q1.13** There are many locations with FTTH that we built out in 2024, but they are shown as ESLs on the newly released BEAD map. How are we to submit these locations to DOM so taxpayer funds are not used to overbuild already existing FTTH locations with BEAD funding??

**A1.13** See A1.1

**Q1.14** We have all of our NOFA #008 locations built out with FTTH, but there are some NOFA #008 locations that are on the new BEAD map as "unserved" or "underserved". How do we correct these errors?

**A1.14** See A1.1

**Q1.15** We started FTTH projects this past Spring and have already deployed FTTH to many locations indicated on the BEAD map as ESLs. How do we submit these dozens of newly deployed FTTH locations to DOM to indicate that they are now served by 1000/1000, so they aren't overbuilt with BEAD funds?

**A1.15** See A1.1

**Q1.16** Will submitted applications be made public after the application acceptance window closes, but before the application review is completed? If so, after submitted applications are made public, will there be a challenge process in place for companies to utilize, if they have locations which are already served, and those locations are included in some other companies' applications? I ask because there are 226 locations in the eligibility data file which show as unserved or underserved, but which we are serving with fiber to the home at greater than 100/20 speeds as of the 12/31/2024 BDC filing.

**A1.16** See A1.1

**Q1.17** If a provider includes an eligible location in their application, but then finds that the location is currently being suitably served by another provider using the same medium of delivery, is the application provider still required to deliver a service to the eligible location?

**A1.17** See A1.1

**Q1.18** Noticed some locations show underserved although we buried them with fiber in NOFA #006 and they have access to 1 Gig. In some instances, the homeowner refused service. Will these still be available to fund again?

**A1.18** See A1.1

**Q1.19** It is stated that the latest version of the fabric map will be used, but what is the effective date of that map data? Dec 31, 2024, or June 30, 2025?

**A1.19** See A1.1

**Q1.20** If a broadband service provider has a fiber project currently in construction and has committed to those locations with 1Gbps fiber, how can we inform DOM so those locations aren't overbuilt by another provider via NOFA #009 funding? Funding for these locations would be a waste of grant funds and taxpayer money.

**A1.20** See A1.1

**Q1.21** Within my ILEC I have 5 locations appearing on the version 6 map as "unserved". All 5 of these locations are non-existent/bad locations. We have facilities that could serve them, if they were actual locations. How can I remedy this?

**A1.21** See A1.1

**Q1.22** In short many locations that we were awarded NOFA #007 (and maybe 6 & 8) funding – are showing as eligible for funding in the NOFA #009 project. There are also many that are near or adjacent to past or current NOFA builds that we have connected or have it available if the customer wants it. If the location was non-awarded and we connected them, you might not know we connected them. Regardless, we have fiber to many locations or will have fiber to more locations when our NOFA #007 & #008 builds are done that are showing as eligible for NOFA #009 funding. I have screen shots of many areas where this is the case and can provide if needed. The places shown are places that were already funded or across the road from a funded area.

**A1.22** See A1.1

**Q1.23** Does a service provider need to apply for NOFA #009 in order to notify DOM of ESLs that already have fiber?

**A1.23** See A1.1

**Q1.24** How and when can we notify DOM-DOIT of newly built locations since the "As Of" date, so grant dollars are not wasted by providing support where fiber already exists.

**A1.24** See A1.1

**Q1.25** There are 2 communities we buried with fiber entirely at our cost no grant funds were used, that show eligible for funding. Our BDC filing for June 30, 2025, will show these as served by fiber. Will they still be eligible for funding and if so, can we apply for the funding since we just buried the fiber?

**A1.25** See A1.1

**Q1.26** What is the process of notifying DOM of ESLs that already have fiber if a service provider doesn't want to submit a NOFA #009 grant application?

**A1.26** See A1.1

**Q1.27** Will NOFA #009 funds potentially be awarded to applicants for ESLs even though we recently deployed FTTH in the area and the landowner refused service? For example, some hog confinements are marked as unserved, but the owner doesn't want broadband. Will grant funds be awarded for such locations in the middle of our fiber service area??

**A1.27** See A1.1

**Q1.28** Will the OCIO be using & applying the July 25 Fabric Map as a way to see who is served?

**A1.28** See A1.1

**Q1.29** How can applicants or non-applicants challenge map errors?

**A1.29** See A1.1

**Q1.30** There are locations in NOFA #009 that are locations being funded in NOFA8. Will this be corrected?

**A1.30** See A1.1

**Q1.31** If we currently serve or have the ability to serve a location that Dom DoIT has identified as unserved or underserved, is the only way to ensure another entity does not receive funding is file an application for those locations with \$0 request?

**A1.31** See A1.1

**Q1.32** There are many locations that show as unserved or underserved that we now provide fiber service to. Will there be a window to challenge these locations to prevent use of grant dollars to overbuild an existing network. Removing locations that are served will help stretch the available funds.

**A1.32** See A1.1

**Q1.33** There are roughly 40 locations that are on the BEAD map but were either on my NOFA #008 or passed by my NOFA8. Do I need to submit an application including those addresses to confirm I can serve them.

**A1.33** See A1.1

**Q1.34** When map errors are identified and communicated to Dom DoIT - what is the probability those errors will be corrected?

**A1.34** See A1.1

**Q1.35** New locations that were previously considered ineligible are now eligible within our NOFA8 area (and within our BIZ). Can we work to make these reimbursable under NOFA #008?

**A1.35** See A1.1

**Q1.36** Do we have to submit an application to have the ability to challenge other applications

**A1.36** See A1.1

**Q1.37** What types of challenges will be considered legitimate?

**A1.37** See A1.1

**Q1.38** Can we submit an application with zero requested funds to show locations we can already serve but not be on the hook for the additional requirement that come with Bead, i.e. letter of credit, cyber security, supply chain, ownership restrictions, etc.

**A1.38** See A1.1

**Q1.39** If there are ESLs that we've already built with fiber that exceeds 100/20, should we apply for those same ESLs and say that we have zero costs - as a way to remove BEAD locations that could potentially be awarded to another service provider that has no idea that the ESLs are in reality already "served"? We have 220 locations like this.

**A1.39** See A1.1

**Q1.40** If there are locations on the BEAD map that show as eligible but are served with fiber, is there a way to identify them as "No Bid & Served" so they are not funded by BEAD grant dollars?

**A1.40** See A1.1

**Q1.41** We have identified 130 ESLs from our 2024 FTTH projects that are on the BEAD/NOFA 9 map, and in addition - another 100 ESLs on the NOFA #009 map for 2025 FTTH projects that we're nearly ready to place into service. What process is there, or can we submit those already-built ESL locations, to save NTIA funds and be assured that those same locations won't be overbuilt with BEAD funding?

**A1.41** See A1.1

**Q1.42** Are we allowed to indicate locations that are... trees, rocks, grain bins at most? Would prefer to not budget these locations for our sake and the Iowa BEAD program.

**A1.42** See A1.1

## **2. Conduit Requirement**

**Q2.1** In Section 1.6.3 of NOFA #009, it states that "Any Project that involves laying fiber-optic cables or conduit underground or along a roadway must include interspersed conduit access points at regular and short intervals." Are we supposed to plan for excess capacity in our conduit? If we place a conduit and then blow fiber through it so that it is full, what good would regular access points do?

**A2.1** This is a requirement of the BEAD NOFO, Sec. IV.C.2.b.ii, pg. 66. NTIA has since waived the requirement of excess capacity and open access, however the requirement of interspersed access points at regular and short intervals remains a requirement of the program. NTIA does not define "regular and short intervals," but this is likely done in common practice when constructing buried fiberoptic networks. If your project design does not include conduit (direct bury) this requirement is not applicable.

**Q2.2** In Section 1.6.3 of NOFA #009, it states that "Any Project that involves laying fiber-optic cables or conduit underground or along a roadway must include interspersed conduit access points at regular and short intervals." If we direct bury our fiber plant, do we still have to place conduit?

**A2.2** See A2.1

**Q2.3** In Section 1.6.3 of NOFA #009, it states that "Any Project that involves laying fiber-optic cables or conduit underground or along a roadway must include interspersed conduit access points at regular and short intervals." How could fiber construction ever compete pricewise against wireless or LEO satellite, if we are burdened with providing additional capacity in our plant for other providers? Are wireless carriers or satellite providers required to provide spectrum or transponder capacity for other providers?

**A2.3** See A2.1

**Q2.4** Exhibit A, section 1.6.3.1 includes the following characteristics of a completed project: "Any Project that involves laying fiber-optic cables or conduit underground or along a roadway must include interspersed conduit access points at regular and short intervals." Can you please explain why it is necessary to include access points we otherwise might not have included? Can you define "regular and short intervals"? And won't placing this extra burden on wireline applicants make it more difficult to compete with wireless applicants, in terms of project cost?

**A2.4** See A2.1



### **3. Compliance**

**Q3.1** Is the financial pro-forma for the project area only, or for the total company, including the project area?

**A3.1** Financials will be required for the project and as part of the risk assessment process. Financials will also be requested for the entire company. This is to evaluate whether the ISP has the financial capacity to successfully complete the project.

**Q3.2** Can you please expand upon the concept of testing windows? What is the frequency, length, process and corresponding reporting requirements?

**A3.2** Reporting requirements will be on a quarterly basis and at the time of payment. Please note that these requirements are currently under development and will be communicated once finalized.

**Q3.3** If awarded, once our project commences, will we be able to submit a claim for reimbursements every six months, and receive reimbursement as the project progresses, over the course of the project?

**A3.3** Correct. See NOFA #009 Section 1.6.2.2.

**Q3.4** If a service provider is not an ETC and does not provide Lifeline Subsidies in USAC, are they still eligible to submit a grant application? Under 1.3.15 the reference is FCC Lifeline Program Subsidy. We assume the provider does not have to be an ETC to have a low-income eligible package.

**A3.4** Providers do not need to be an Eligible Telecommunications Carrier for purposes of applying the low-cost service option. Rather, the subscriber must be eligible for the low-cost service option based on eligibility for the Lifeline Program Subsidy. DOM intends to modify the provisions of NOFA #009 to clarify that a grantee need not be an ETC.

**Q3.5** Can you provide an example of the narrative plan for compliance with the National Environmental Policy Act and National Historical Preservation Act? What information needs to be included in the narrative?

**A3.5** The narrative plan for compliance with the National Environmental Policy Act and National Historic Preservation Act are specific to each individual proposal and will depend on the information each applicant compiles from available resources including, but not limited to, Historic Structures and Archaeological Sites Review and Iowa DNR screening tools.

### **4. Priority Broadband and Scalability**

**Q4.1** Under section 1.3.19 of the NOFA, where it states, “and can easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other

advanced services”, what specific criteria is the State using to evaluate if a project is able to meet this scalability requirement? Does the state have a certain minimum bandwidth threshold in mind, which the project must be able to scale up to - for example, scalable up to 20 Gbps?

**A4.1** The specific criteria may depend on multiple factors, including but not limited to, the project area, technology, and information related to speed, latency, reliability, and consistency in quality of service. It is the applicant’s responsibility to include relevant documentation to support the consideration of whether a project is a Priority Broadband Project. Evaluations involve fact-specific considerations that will be addressed on a case-by-case basis.

**Q4.2** How will DOM evaluate whether a proposal is a "priority broadband project" or not? If one application is clearly scalable and satisfies the other priorities and a competitive application is not as easily scalable although less cost per connection, will DOM have any leeway to select the project that is more future proof?

**A4.2** See A4.1

## **5. Project Design/Professional Engineering Certification**

**Q5.1** Section 2.2.6.9.2 Can I Provide a Generalized construction map with the location of the line and approximate equipment locations. With the tight submission window, it will be difficult to complete the final "construction ready" prints with the exact locations of our vaults

**A5.1** In the updated Policy Notice, NTIA dictated a 90-day timeframe in order to complete the grant process. DOM has allowed the requirement of a PE stamp on the design elements to be pushed to the Supplemental Data Collection phase, which allows until 8/31 to provide the documentation approved by a PE. At the time of application, the BEAD NOFO dictates that the network design, network diagram, project costs, and build-out timeline and milestones for project implementation be provided, but additional time is allowed to get the PE certification. Applicants should provide as much technical detail as possible regarding their project at the time of application.

**Q5.2** Due to the short turnaround required by the State can we submit "rough drafts" of the construction prints and then work toward the "shovel ready" prints as we get further along in the design process. It’s nearly impossible to complete 10 miles of shovel ready prints in the 3 weeks allowed by the OCIO.

**A5.2** See A5.1

## **6. Wireless Projects**

**Q6.1** If we have existing wireless infrastructure in unserved or underserved location areas can we use this grant to upgrade our infrastructure to serve these locations at the required speeds?

**A6.1** Yes. If your NOFA #009 project facilitates service to ESL's currently on the map, equipment or labor required to upgrade network performance to the BEAD minimum thresholds would be eligible for funding.

**Q6.2** The ULFW locations are listed on the map as "likely" ineligible. If there is uncertainty, should applicants include those in their applications if they are able to be served as part of the project?

**A6.2** "Likely Ineligible" locations may be included in an applicant's project; however, they will not count toward the total locations in the project area and will be unfunded as part of NOFA #009. These locations are considered "likely ineligible" as NTIA must approve this data as part of Iowa's Final Proposal Submission. NTIA dictated these locations should be marked this way and indicated with a specific code in the final data set as part of the Final Proposal.

## **7. Miscellaneous**

**Q7.1** Will the Locations that currently show LEO availability of what is considered "broadband" be removed from the list of eligible locations. I have many examples in my territory where the Fabric map shows Star link at 300x30 and yet on the Iowa Map they are still eligible for grant funding.

**A7.1** Per the BEAD Restructuring Policy Notice, Appendix B, LEO will be awarded capacity grants. While they can currently serve "any" location, they are not capable of serving "every" location so therefore NTIA does not consider these locations as "served".

**Q7.2** How is the term "excessive cost" defined?

**A7.2** BEAD Restructuring Policy Notice, Section 3.4: NTIA declines to adopt a national cost threshold over which a project would be deemed excessive. However, NTIA hereby reserves the right to reject any proposed deployment project or specific BSL connection for which costs to deploy are excessive, as determined by NTIA based on the cost characteristics of the area to be served.

**Q7.3** Regarding the "Benefit of the Bargain" round. If funds remain after that round, will the state conduct an additional funding round for projects not selected during the BotB round?

**A7.3** DOM anticipates receiving bids for all ESL locations in NOFA #009. Potential future funding rounds will be addressed after the NOFA #009 results have been evaluated.

**Q7.4** Regarding the term "facilitate last-mile connection". Could the grant awardee and owner of the network hire a partner provider to the ISP on the network they own?

**A7.4** NOFA #009 Section 2.2.2. outlines the information required regarding Applicant/Owner Organization including, but not limited to parties interested in the applicant, parties holding stock in the applicant, limited partnership information, general partnership information, LLC information, indirect ownership information, organizational charts, and all parent, subsidiary, and affiliate relationships.

**Q7.5** Let's assume our project is ranked in Group A (a priority broadband project). If a different project has location overlap with our project, and this other project is ranked in Group B (a non-priority broadband project), will the overlapped locations in the two projects be evaluated against each other based on primary criteria (cost) or secondary criteria, to see which project gets awarded the locations? Or do the overlapping locations get awarded to the Group A project automatically?

**A7.5** The NOFA requires DOM to award first to Priority Broadband Projects (Group A) before considering Non-Priority Broadband Projects (Group B). Tertiary Group C projects are considered only after all Group A and Group B awards are made. Therefore, your hypothetical scenario would require all locations in the Group A project to be awarded without comparison to a Group B overlap unless the Group A project was deemed to have excessive cost per location.

**Q7.6** Can an applicant receive grant reimbursement for the cost of acquisition of an already built fiber distribution network (both middle mile and last mile facilities) from another provider?

**A7.6** NOFA #009 Section 1.4.1. Construction of a proposed Project may not commence prior to Award.

**Q7.7** If service has already been extended to an address identified in the BBv6 map, will an ISP be compensated for the work.

**A7.7** NOFA #009 Section 1.4.1. Construction of a proposed Project may not commence prior to Award.

**Q7.8** Exhibit A, section 1.3.1.8 states that we may only include eligible expenditures "Incurred prior to four years following execution of the Grant Agreement." Can you please clarify what this means in terms of what will be considered eligible based on when the expenditure was/is incurred?

**A7.8** The period of performance for NOFA #009 is 4 years from the execution of the Agreement. This is meaning that expenses must have been incurred prior to the end of that 4-year period. Purchases prior to execution of the Agreement, such as

utilizing inventory, may be allowable, provided they are eligible expenses. (NOFA #009 Section 1.3.1.)

**Q7.9** If the mainline routes for a project have been partially completed, but drops have not yet been installed, can funding for the drops be submitted for BEAD funding?

**A7.9** NOFA #009 Section 1.4.1. Construction of a proposed Project may not commence prior to Award.

**Q7.10** Can you please provide a link to download the historical sites data set? This would be helpful in laying out the routes and provide a heads-up during construction.

**A7.10** The I-Sites data is not made publicly available, but the tool can be used to determine if there may be impact to a historical site in construction of your project.

**Q7.11** The DNR PERMT Project Screening site displays a message saying, “Please Wait... this may take a minute” and never completes my query. Is there an alternate way to complete this screening?

**A7.11** This appears to be accessible by using the link on the NOFA #009 website. Please contact the helpdesk at [broadband@dom.iowa.com](mailto:broadband@dom.iowa.com) if you need further direction.

**Q7.12** We are considering a single application that contains several areas that are non-contiguous. Is that acceptable?

**A7.12** Yes, this is acceptable.