

**DOC-NTIA-OTIA (US)**  
**Broadband Infrastructure Program**

**Moderator: Sarah Bleau**  
**July 15<sup>th</sup>, 2021**

**Sarah Bleau:**

1:50

Hi folks, my name is Sarah. I'm jumping on to let you know that unfortunately, for a portion of this webinar, if you are using the phone audio to dial in, [with] that phone bridge version for the audio you will not be able to hear a portion of the webinar. The solution that we do have, is if you're able to go to the GoToWebinar app from the Apple store or the Google Play Store, you should be able to hear the prerecorded portion of the webinar. I'll also add that if that still does not work for you, within seven days we will have a recording, the transcript, and the materials from this webinar posted on our website. Again, we apologize for this, but that is the solution we have, and we will get started here shortly. Please hold on for a few more minutes. Thank you very much.

3:36

Hello and thank you for joining us today for Broadband USA's webinar. I am Sarah Bleau with NTIA's BroadbandUSA Program.

3:46

As a reminder, the webinar is being recorded and will be posted to NTIA's BroadbandUSA Program website. Today's webinar focuses on NTIA's broadband infrastructure program and is the third of a four-part series.

4:01

Before we begin, I would like to review a few of the logistics. First, we will open up the webinar for questions and answers upon completion of the presentations. As you listen to each presenter, please use the question box in the lower right-hand [side of the] screen to submit your questions or comments.

4:21

Second, the presentation – along with a transcript and audio recording of today's session – will be available on our website within seven days of this webinar under the Events/Past Events tab. And, finally, please visit our BroadbandUSA website for information about our technical assistance program, including useful guides, products, publications, and other tools that can assist you with planning, funding, implementing, et cetera, your broadband project. We provide updated information, including our monthly newsletter and other broadband news.

4:59

Our presenters today are Katherine Bates, Jennifer Duane, and Tim Moyer, all from the BroadbandUSA team within NTIA. We are also joined by Amanda Pereira, who is from the First Responder Network Authority.

5:13

I'd like to tell you a little bit about each of our presenters.

5:17

Katherine Bates is back with us after being on loan to the Treasury Department, and she's acting as the team lead for this Broadband Infrastructure Program. Additionally, Katherine has worked with state and local governments to increase broadband access throughout the United States, focusing on unserved and underserved areas. Before joining BroadbandUSA, she worked with the large library systems on the E-Rate Modernization effort and also at ICF International, which is a global consulting firm. And she focused there on broadband, funding, planning, training, and technical assistance. Prior to that, Katherine spent about 10 years with a national association representing municipal interests, focusing particularly on information technology, broadband policy, and community and economic development. Katherine received her Bachelor's in Business and a Master's in Public Administration from the University of Tennessee in Knoxville. Please welcome Katherine.

6:20

Our second speaker is Jennifer Duane. Jennifer is a Senior Broadband Program Specialist for the National Telecommunications and Information Administration, which we call NTIA, for our BroadbandUSA program, where she manages the office's grant programs, and facilitates inter-agency coordination to support efforts to streamline federal permitting processes. Jennifer joined NTIA in 2009 to develop policy for the Broadband Technology Opportunities Program, which is called BTOP. She then served for two years as Senior Advisor in the Office of Chief Counsel for NTIA, providing legal advice to NTIA offices on a variety of telecommunications, information technology, and commercial data privacy matters. From 2012 until 2017, Jennifer served as Senior Advisor to the Assistant Secretary on matters related to broadband and public safety.

7:21

Before joining NTIA, Jennifer served as a State regulatory attorney, and also Director of Federal Regulatory Affairs for Sprint. She earned an undergraduate degree in Economics from Penn State University, and a Juris Doctorate from the George Washington University Law School. Please welcome Jennifer.

7:41

Tim Moyer is our Director of Data and Mapping for NTIA's BroadbandUSA Program. Tim leads the NTIA's National Broadband Availability Map which is called NBAM and also provides program management and data analytics support for the NTIA BroadbandUSA Program. Previously, Tim managed a portfolio of infrastructure grants as part of BTOP. He is an expert in project and program management and has spent about 20 years with other telecommunication projects. Before

joining NTIA, Tim worked at Sprint, where he was the Director of Project Management and Corporate Development and Spectrum Management as well. He's earned a Bachelor of Arts and a Master's of Business Administration from Cal State University in Hayward. He's also earned a Master's Certificate in Project Management from the George Washington University and is a Certified Project Management Professional. Please welcome Tim.

8:46

And at last, we have Amanda Pereira. Amanda is an environmental and NEPA Specialist with more than 19 years of experience. She has worked on a wide variety of environmental and social issues, including environmental compliance, community development, socioeconomic impact analysis, and urban master planning. Her work particularly focuses on compliance with the *National Environmental Policy Act*, called NEPA, as well as other Environmental and Historic Preservation Laws through developing NEPA documents, developing program strategy, supporting compliance activities, drafting technical requirements, and conducting training on regulatory compliance. She has served as a project manager, lead author, or subject matter expert on numerous environmental impact statements and environmental assessments. She has worked extensively on NEPA for federal grants including BTOP and the Public Safety Interoperable Communications Grants programs. Please welcome Amanda.

9:57

Today our team will cover a variety of topics from key dates and important reminders about the program, and also a tool called the Indicators of Broadband Need, a public map which you'll get a demonstration of in a few moments. Then we hope you will have a much better understanding [and] some good insight into the environmental and historic permitting requirements. And finally, we will open up for Q&A upon completion here. Please type your questions into the lower right box, and we will do our best to respond to them with the remaining time.

10:32

And now, I am really excited to let you meet Katherine Bates. Thank you.

10:40

**Katherine Bates:**

Thank you, Sarah. I'm happy to be here today. I recently returned from detail at the US. Department of Treasury, where I was working on the broadband funding in *American Rescue Plan Act*.

10:50

I am happy to be back home at NTIA working on this exciting program that will increase broadband deployment in the US. This program is especially near and dear to me as it highlights the important work that state and local governments are doing to connect all Americans.

Commerce Secretary Gina Raimondo understands the importance of connectivity and how it's tied to the success of the US economy.

11:12

It is a priority for the Administration and the Department of Commerce. She recently stated that today, Americans in rural areas and on tribal lands particularly lack broadband access. In urban areas there's a stark digital divide. A much higher percentage of white families use home broadband Internet than black and Latino families. Widespread affordable coverage promises to bridge those disparities, bring the benefits of the digital age to all, and transform our economy just as electrification did 100 years ago.

11:43

Like I said, it's an exciting time to be working to connect all Americans. One vehicle to do that is this program, NTIA's Broadband Infrastructure Grant Program.

11:55

I want to go over a few high-level details of the program before I hand it off to my colleague. The NOFO and FAQs are posted at [broadbandusa.ntia.doc.gov](http://broadbandusa.ntia.doc.gov) under Grants. We will have round four of FAQs coming out soon and we'll notify you when those are posted.

12:16

As most of you know, complete applications must be received by [www.grants.gov](http://www.grants.gov) no later than 11:59pm Eastern Time on Tuesday, August 17 (please don't do October). NTIA expects to complete the review, selection of successful applicants, and award processing by November 15th. The two important dates you must know are August 17th and November 15th.

12:48

We still need a few merit reviewers for this program and other NTIA grant programs because we conduct merit reviews for all the applications. This review involves teams of technical experts to look at the applications and review it on criteria specific to each program, so all three programs need merit reviewers. We are seeking qualified volunteers with expertise and experience in a wide array of broadband activities, including infrastructure and adoption. If you're interested, please e-mail a resume to [grantreviewer@NTIA.gov](mailto:grantreviewer@NTIA.gov). Again that's [grantreviewer@NTIA.gov](mailto:grantreviewer@NTIA.gov) containing the following information: your name; your residence that includes the city and state; your e-mail and phone number; your employers, including the states where you were employed, your position title, and your years and types of experience, positions, and fields related to broadband activity. If you have any other questions about the merit review process and want to be involved, please e-mail those to the same e-mail: [grantreviewer@NTIA.gov](mailto:grantreviewer@NTIA.gov).

14:01

Thank you and now I'd like to turn it over to my colleague, Jennifer Duane, to talk more specifically about the grant program.

14:10

**Jennifer Duane:**

Alright, thank you, Katherine. I'm Jennifer Duane, Director of Grants for our Office of Telecommunications and Information Applications here at NTIA, and I'm going to be giving an overview of our Broadband Infrastructure Program.

14:24

Now, our previous webinar in June focused in-depth on the requirements of the Broadband Infrastructure Program and our Notice of Funding Opportunity (NOFO), which we had released in May. I'm just going to give a brief overview for purposes of this webinar presentation on some of the key points of the program that I want to reiterate and highlight for this webinar session.

14:51

I just wanted to go over the program overview elements. First, it's a grant program [that has] \$288 million to available to award. The eligible entities are covered partnerships, which are states, or one or more political subdivisions of the state, and a fixed broadband service provider.

15:12

They are partnering to deploy covered broadband projects, which are defined as competitively and technologically neutral projects for the deployment of fixed broadband service that provides qualifying broadband service in an eligible service area.

15:31

We opened the application window with the release of our NOFO on May 19th, and we are accepting applications through August 17, 2021. This is a 90-day application window that was required under our statute that established this program in the *Consolidated Appropriations Act of 2021*.

15:52

So, I just wanted to reiterate some of the key definitions in the Act. First is the definition of qualifying broadband service. This is defined as download speed of not less than 25 megabits per second, an upload speed of not less than 3 megabits per second, along with a latency sufficient to support real-time, interactive applications.

16:17

Now, in our NOFO we added a bit more context to this definition with respect to the download and upload speeds of 25/3. We added the requirement that there must be the ability to deliver 25/3 simultaneously to every household in the eligible service area. With respect to latency, we added some more context around that definition, as defined as 95% or more of all peak period measurements of network round trip latency. That

is between the customer premises and the closest Internet core peering interconnection point are at or below 100 milliseconds.

16:58

Now, this is consistent with how the FCC defines latency for purposes of its universal support programs and the download/upload speed is consistent with how the Rural Utilities Service (RUS) defines that requirement for purposes of its Reconnect Program.

17:18

Another key definition that I want to highlight and reiterate during this webinar is the definition of unserved. That means households lacking access to qualifying broadband service, which I just discussed in the previous slide, and that no broadband provider has been selected to receive, or is otherwise receiving, federal or state funding subject to enforceable build out commitments to deploy qualifying broadband service in the specific area where the household is located.

17:48

And now the other key definition that I want to emphasize here is eligible service area, and that is defined in the Act as a census block in which broadband service is not available at one or more households or businesses in the census block.

18:05

To be eligible for grants under this program, the Act requires certain things that a covered partnership must submit. An application that describes the following: it must define the covered partnership. So we want to know the identity of the state and the one or more political subdivisions of the state, and the fixed broadband service provider that form the covered partnership. We want to understand the project that they're going to implement, the type of broadband project that they will deploy for purposes of this program.

18:39

The covered partnership will define the proposed service area that they plan to deploy the broadband infrastructure, and we also want to know if there's either federal or state support that the broadband service provider is receiving as a result of other federal or state broadband investment programs.

19:01

This information will be reported in the project narrative, which will be submitted along with the other application materials, and that is described in more detail in our Notice of Funding Opportunity.

19:16

The other requirement that I want to emphasize is that each covered partnership may submit only one application for this grant program. The covered partnership may include more than one provider of fixed

broadband service in its application, and the provider of fixed broadband service may participate in more than one covered partnership.

19:40

Now, the Act defines a number of funding priorities and are listed here in decreasing order. The first priority is projects designed to provide broadband service to the greatest number of households in an eligible service area. This is a priority that NTIA will be focusing on in its initial review of applications. The second priority is projects designed to provide broadband service in an eligible service area that is outside of an urban area, county, city, or town with more than 50,000 inhabitants. So, the intent here is to focus on more rural service areas.

20:24

The third criteria are looking at projects that are the most cost effective and prioritizing projects in areas that are the most rural.

20:32

And then finally, we'll be looking at projects that are designed to provide broadband service with a download speed of at least 100 megabits per second and an upload speed of at least 20 megabits per second.

20:45

So again, I want to emphasize some key application dates. As I mentioned earlier, the application deadline for this program is August 17, 2021. All applications must be received by 11:59pm [Eastern] through grants.gov

21:02

Pursuant to the statute, NTIA has 90 days to review and approve or deny applications that we receive under this program. So that puts our target date at November 15th, 2021. Now, the Act provides a very aggressive timeline for expending funds under this program, limiting it to one year after receipt. Now, we realize with broadband infrastructure deployment projects it's very rare that a broadband project will be completed within one year, and so the Act also provides for the ability of the Assistant Secretary to grant an extension for broadband construction projects. To qualify, the covered partnership must certify that it has a plan for the use of the grant funds, the Construction project is underway, or extenuating circumstances require an extension to ensure project completion. Now we fully expect to be granting these extensions, and we've also allowed covered partnerships to submit that request for an extension with their application.

22:12

The NOFO also indicates that no later than 90 days before the one-year award period, covered partnerships must submit those requests for extensions to give us time to review and evaluate those requests.

22:26



So now I'm going to turn the presentation over to my colleague Tim Moyer. He is our Director of Data and Mapping and he will be discussing our recently released Indicators of Broadband Need map.

22:42

Tim, over to you.

22:47

**Tim Moyer:**

Thanks, Jennifer. So, my name is Tim Moyer. I'm the Director of Data and Mapping here at NTIA. I'll be providing an overview of our new Indicators of Broadband Need map.

22:58

So over the next few slides, you're going to see examples of the indicators of need data that we've included in the map. I'm going to dig into those in detail, so, I just want to provide an overview here, and then we'll transition into the demo of the map itself.

23:14

So, you can see speed tests. We have American Community Survey (ACS) data. And at this point, I'm going to share my screen and take over.

23:25

So we start here at NTIA's BroadbandUSA website, select Resources, go to Data & Mapping, and we come to the Public Map & Tools section. We've got an overview here and then we can go directly to the map itself.

23:44

So, the Indicators of Broadband Need interactive map was designed to bring multiple, third-party data sources together to help the public better understand the digital divide and the connection between poverty and lack of broadband access or use.

23:58

So, I'm going to provide a high-level overview of the map so we can see how to navigate, and then I'm going to dig into the details.

24:05

So, when you first turn on the map, you're going to get this popup screen here that provides an explanation of what the map is. We'll select OK. Here we have the different indicators of need. You'll see that we have data at the county, the census tract, and the census block. We also have supporting information here from Minority Serving Institutions and Tribal lands. And as we dig into the details, I want you to keep an eye down here because when we zoom into different levels of geography, you'll see that this will change. And interestingly, the popups will change also. It's a dynamic map.

24:46

If we look at our legend, red is an indicator of need. Green means lack of an indicator of need, and gray means there's no data. We also have for our



Minority Serving Institutions (MSI) color coded by institution type. And we can see here how the Tribal lands will be displayed.

25:05

Over here, we have a filter that enables us to toggle individual MSI types on and off, and I'll show you that in action in a little bit. And in our information section, we have an overview about the map.

25:20

An important disclaimer here: the data presented as is – we've collected third-party data. This is not data that NTIA generated ourselves, and so we're bringing that data together in a meaningful way. We've provided a way to access the underlying aggregated data that supports the map, and we provided layer by layer descriptions with links back to the source material.

25:44

Over here, you'll see a user guide. Again, we have information about the data layers themselves. Then for folks that aren't as familiar with GIS, this is a commercial off the shelf software package. And so we've got some instructions about how to do some basic GIS navigating and all the different sections here.

26:07

We also have a FAQs document, frequently asked questions for things that folks may find interesting. And this will be a living document that will grow over time.

26:20

So let's go back to the map. So what's interesting with GIS is layering. And so you'll see here that we have all of these layers toggled on right now. I'm going to turn a few of them off and then talk about them individually.

26:33

So we start with the 477 data. And the way we presented this is that we know that 477 data is presented at the census block, and the methodology is that if anybody at the census block is served, the whole block is served. And so that can lead to overstatement of broadband availability in some areas.

26:51

So what we wanted to do is find out the areas where the broadband providers themselves have identified in the 477 reporting that they don't have services that meet the 25/3 threshold. And so you'll see here that the areas in red don't have 25/3 infrastructure.

27:10

If we look at the Microsoft usage data, think of this as machine-to-machine type data. When we're asleep at night, if you have a Microsoft product that connects to the Internet, it can download security software

and things like that. Microsoft has a way to measure the speed on the download. And so what we're saying here is that 75% or more of the people in the county that use Microsoft services are not downloading at 25 megabits. And so when we turn that on, you'll see that the areas that got redder reinforce the 477 data. But we also see lots of areas where the Microsoft data suggests that there are other areas that may not be at 25/3.

27:55

So, I'll toggle this back off and you can see the 477 data. And then when you bring the Microsoft data on, it's a little bit of a different picture.

28:04

So look at Measurement Lab. Measurement Lab is crowdsource speed test data. We see a similar story at the county level. It reinforces some of the 477 data, but also highlights areas that potentially are an indicator of need. When you combine all three together, you really see them reinforcing [one another]. And it's important to note that NTIA recognizes that there is no silver bullet, single dataset that's going to answer all these questions. There are challenges with any crowdsource dataset. So it's the layering of multiple data sets that reinforces and gives you more confidence as areas become redder that that's something worth digging into.

28:44

Now we'll look at the census tract level. We have Ookla speed test data. And you'll see that the Ookla also has lots of pockets that weren't identified in the 477 data, but also reinforces the 477 data.

29:01

I'm going to turn that off and we're going to turn over our attention to some of the survey data from the Census Bureau's American Community Survey. We see here that 25% of households report that they don't have Internet access at all.

29:20

In this we see that 25 percent of households say that they don't have some sort of computer device – either a computer, a laptop, or a phone that's connected to the Internet. This down here is very interesting if you look at the poverty dataset. It's going to take a second to render, but we have 20% or more of households are below the poverty line. And you're going to see a really interesting correlation here when I start turning on the Tribal lands and the Minority Serving Institutions. Minority Serving Institutions follow the poverty line. Similarly, you're going to see the Tribal lands populate here.

30:05

Now I mentioned that [we have the ability to filter] the Minority Serving Institutions, so I'm going to go over here. Maybe I want to see HBCUs, or maybe I want to see Tribal colleges. Depending on what your specific use case is, you can toggle things on and off and investigate.

30:30

So, I'm going to go back here and I'm going to turn these back off, and I'm going to go back with the 477 and the Ookla data. Now, everything we've done so far is at a macro national level, but we have the ability to zoom in to areas. And so I'll ask you again to keep an eye over here as the county tract and census block and will let you know the level of geography [that] we're at.

30:55

But I'm going to go look at East Carroll Parish, Louisiana and I'm going to click here. You'll see that we're at the county level. The search results, if I click here, is going to bring up a popup of information.

31:24

A few things that are interesting here. It's dynamic from the perspective that it doesn't matter which layers I have turned on – the popup will have information that's available at that level of geography. And so we'll see here that we're looking at Issaquena County, Mississippi and we also have East Carroll Parish, Louisiana because at this level of geography there were two in that general area. Looking at East Carroll Parish, we see that we have close to 7000 people. The survey data says that 55% of the households in this area don't have Internet access, close to 52% don't have some kind of computer device.

32:04

We see that the Measurement Lab (M-Lab) data actually says that at the county level, we do have 25/3 – it looks at 28/9 roughly. The Ookla speed test data is slightly lower than the 18/8 range, and then we see that Microsoft data there is saying that 10% aren't getting over 25 megabits on the download. What gets interesting now is if I zoom in and I go to a lower level of geography. As I zoom in here, you saw down here that we change to the tract. And so the popup now changed to the tract and now it's focused on the layers that have tract level detail.

32:51

So again we see here in Issaquena County. [There is a] little over one thousand people in that county. ACS is saying 58% [are] without Internet access, [and] 45% [are] without some kind of computer device. And the Ookla speed tests at this level of granularity is telling us 8/3, so certainly not 25/3. And then as we zoom to a little bit more, we're going to see that it'll change to the census block. It's taking a second here.

33:55

Apologies for the lack of performance.

34:09

Now you saw that the tract and the census block was activated. And so now when I click in here, I'm going to have census block information. So I see the 477 data and I also see census tract data.

34:28

So this is all a visualization, a way to navigate through the map. I mentioned that we also have the ability to download the data itself. What we've done here is provide three levels of geography. I'm going to go with the county as an example and we can download this. [I'll] bring it up. I can go here and do a nice simple filter, and then I can go find that dataset.

35:08

We'll go back to Louisiana here. Hit OK. Now we'll go to East Carroll. Click on that. Then we'll see that all that data is here: number of households, those who don't have a computer, poverty level, Ookla data population, Measurement Lab data. So depending on whether or not you want a visualization where you want to use this aggregated data for different reasons – [it] is all right there. That was important to us to be able to provide that underlying data.

35:54

And with that I'd like to now hand off to my colleagues over at FirstNet who will discuss the environmental and historic preservation concerns. Thank you.

36:05

**Amanda Pereira:**

Thank you and good afternoon. My name is Amanda Pereira and I'm a NEPA Compliance Specialist with the First Responder Network authority and I'm here to talk to you today about environmental and historic preservation requirements. So, environmental and historic preservation (EHP) requirements encompasses a lot of different subjects so we're not going to try to make you an expert in all of this today. But the main thing to understand is that your applications will need to contain sufficient information to allow for initial NEPA analysis and we'll talk a little bit about what that means a bit later. So in order to facilitate this analysis, your application will need to contain a detailed project description, including supporting documentation.

36:45

One thing to be aware of is that grant recipients will be required to obtain all of their federal, tribal, state, and local permits and approvals prior to beginning your project, but this does not need to be done pre-award. Funds may be withheld under a special work condition until EHP requirements are satisfied, and do keep in mind that environmental analysis is an allowable use of grant funds.

37:13

So we're going to give you an overview of some of the regulatory issues and some of the compliance network that EHP compliance takes place within. So, the *National Environmental Policy Act*, or NEPA, was passed in 1970. It's considered an umbrella law. What that means is that NEPA does not have a prescribed outcome. It does not have a mandate for conservation or preservation. What NEPA does require is a process – a

process that allows the federal government to make an informed decision about the impact of its projects before it takes them.

37:47

So, because NEPA requires process, there are a lot of other laws and regulations that can be complied with as part of that process. And it's everything from ones that you've probably heard of -- like the *Endangered Species Act* -- to ones that are maybe a little more specialized like the *Farmland Protection Policy Act*. So there are a lot of ways that the NEPA process actually helps us to be more efficient in terms of completing EHP requirements within the one process.

38:16

So NEPA and the *National Historic Preservation Act*. They both require the government to examine the impacts of its proposed actions before taking them, so it's about informed decision-making. NEPA is triggered by several things. Among others is the use of federal funds, and that does include grant funds. NHPA requirements can be addressed as part of an NEPA compliance process. However, even if an initial NEPA analysis shows that there's minimal requirements for addressing environmental impacts, NHPA consultation requirements may still apply. So again, both NEPA and NHPA review, including consultation, must be completed before an action can begin.

39:01

This slide discusses three levels of NEPA review.

39:06

The first level is a categorical exclusion. Categorical exclusion, or CATEX, is a category of actions that the agency has determined will not have an individual or cumulative significant impact on the environment. If a categorical exclusion cannot be applied to the project, then the next level of NEPA analysis is an environmental assessment. An environmental assessment is a brief document that is intended to analyze the impact of a project on certain number of resource areas, such as biological resources, cultural resources, water resources, infrastructure, et cetera.

39:42

If the analysis determines that there will be no significant impact to the environment, then a finding of no significant impact, or FONSI, will be developed and signed by NTIA. This is the Agency's decision document. If an EA concludes that there will be significant impacts to the environment, or if it is suspected at the outset that significant impacts would occur, then an environmental impact statement will be developed.

40:07

An EIS is prepared for those projects where there will likely be a significant impact on the environment. It is the most comprehensive and time-consuming method of NEPA analysis.

40:19

The final decision relating to the analysis is called a Record of Decision or ROD. Again, NEPA does not contain any mandate for conservation or preservation. There's nothing that says that federal government may not fund a project that has impacts the environment, but it does state that the process must be followed. So with an EIS, this process is codified in the ROD.

40:44

This here is a flowchart that gives you kind of an overview for the NEPA process. If you're a visual learner like me, things like this will be very helpful in terms of giving you a sense of flow of the information and how a decision goes from the proposed action all the way through agency action. So we'll give everyone just a few seconds to take a look at this, and we'll be happy to answer questions about it later.

41:10

We're not trying to make you NEPA experts today, but what we do really want to do is try to make you experts at how to provide a good project description. A good project description will provide enough detail about the potential impacts of the project on the environment to allow NTIA to conduct that initial NEPA analysis that we've been talking about. So how do you do that?

41:32

Well, there's a few things that will be really, really helpful. So first, describe what the project is, and just use as straightforward language as you possibly can. So construction of a 150-foot monopole communication tower, for example.

41:48

And then you're going to need to describe where the project is proposed to take place. And there are two definitions of the word where that we use. One is the physical location – that would be a street address or latitude and longitude if a street address is not applicable. And the other is the physical description of the site and its surroundings. Is it taking place in developed land or open space? Are there adjacent natural resources such as rivers, wetlands, forests? Are there protected lands nearby? Is there's something that is owned by a federal agency, by a Tribe, by a state government, or local government? All of these things will give NTIA an idea of the level of coordination that's going to be required in order to complete the environmental compliance requirements for the project.

42:39

Next, describe how the project will be implemented. For example, it will require one acre of ground disturbance at an approximate depth of five feet. The installation of a concrete pad, an equipment shed, and an emergency generator with a one thousand gallon above ground fuel storage tank.

42:57

Language like that that is very straightforward [and] very descriptive will provide NTIA with the sufficient detail to make an initial determination. Also, please do include ground level and aerial photographs. [Include] Project plan drawings if you have them, Aerial photographs can be something as simple as a screenshot from Google Earth or a similar program.

43:19

For new construction projects, it is highly recommended that you include a floodplain map from the FEMA Map Service Center. Those are available for free download and we've included the URL there. And a wetlands map from the US Fish and Wildlife Service's National Wetlands Inventory, also available for free download at the URL provided. If you do have questions about how to use these websites, then please do let us know.

43:46

This is the most popular question that we get with EHP compliance requirements: timelines. As with most questions regarding EHP compliance, the answer to how long will this take is, it depends. Timelines will be affected by the complexity of the project and the number of consulting parties as we discussed in previous slides: if there are Tribes involved that need to be consulted with, there are other land managing agencies whose land will be impacted by the project that need to be consulted with, [et cetera]. So, all of these things will factor into the amount of time required to address the compliance requirements for the project. The timelines that we're going to discuss in just a second don't take into account other outstanding agency approval processes. That includes things like consultation under NHPA, or the *Endangered Species Act*, permitting from the US Army Corps, et cetera. But do please keep in mind that environmental analysis is an allowable use of grant funds.

44:51

So, based on NTIA receiving a complete record, or a complete application, and a good project description containing all the characteristics we just talked about, we have some approximate timelines to provide you with just for reference in your project planning.

45:08

Categorical exclusion will be developed by NTIA. It assumes that NTIA receives a sufficient project description and that there are no extraordinary circumstances associated with the project. An extraordinary circumstance is characteristic of the project. That means that something that might otherwise qualify for categorical exclusion doesn't because there could be potential resources, sensitive resources impacted. Assuming that none of those exist, and depending on workload and all of these other things, approximately 30 to 45 days to develop a CATEX.

45:45



If a CATEX is not able to be applied to a project, then an environmental assessment, as we discussed, would need to be prepared.

44:53

The grant recipient will develop the environmental assessment, in coordination with NTIA, depending on the complexity of the project, depending on the resources involved in the project, and the number of consulting parties. Environmental assessments, generally speaking, can take approximately 3 to 12 months to develop and deliver to NTIA.

46:15

If an environmental assessment is not appropriate, an environmental impact statement would be required and the grant recipient would develop those in coordination with NTIA. There are extensive public and agency involvement requirements that apply and they take a year or more to develop and deliver to NTIA.

46:35

In my personal experience, one year for an environmental impact statement is rare. It usually takes much longer. And if your project seems to be one that would require an environmental impact statement, NTIA may want to speak with you about re-scoping your project so that you can still meet your objectives but minimize your environmental impacts and not need to develop an EIS.

46:59

So, with that, I'll turn it back over to the moderator, and will be happy to take questions later. Thank you so much for your time.

47:17

**Sarah Bleau:**

Thank you, Amanda. We'll give the other panelist a second here just to get back online.

47:30

OK, all right. Thank you very much, panelists, and thank you to the audience. We're really excited to be here and answer some of your questions. They've been rolling in and [we've been] trying to keep up with them. These are very thoughtful. So thank you for taking the time to attend, and thank you for taking the time to type your questions into the little question box on the right-hand side of your screen.

47:54

I'd like to point out that we are joined here today for the questions and answers by Ming who's a Grants Officer with the NIST office. So Ming is here to try to answer some of the questions, those that he can, about the application.

48:10

I'd also like to point out now that people have had some time to think about the Broadband Infrastructure Program and what project you might want to talk about, people are beginning to look at the application

package, and that includes the [Standard] Form 424. And I'd like you to know that in a week if you go to our website, BroadbandUSA, and go to Upcoming Events, in one week our Tribal Broadband Connectivity program will be doing a webinar on Wednesday, July 21st at 2:30pm Eastern. And in that webinar, they are going to go into detail how to complete the [Standard] Form 424. So, if you've got questions about that, if you're not familiar with it, please I urge you to attend that webinar.

48:56

And then finally, I'd like to point out that we have three rounds of Frequently Asked Questions posted to our website, and we're getting close to posting a fourth round. And, believe me, these are really good questions. There are some tough questions, that's why it takes a little bit of time to figure out what the answer is. The responses that Jennifer has been taking the charge on providing in these FAQ documents, they're designed to help you. So, please, if you've got questions, I'd encourage you to take a look at our FAQs. There are three rounds posted, they're on our website, and a fourth round is coming soon.

49:40

So with that, I have the pleasure of asking questions. Jennifer, I'm going to begin with you.

49:52

There is a question here: can State and Local Fiscal Recovery Funds allocated through the Recovery Act be utilized as matching funds for the program? Can you talk about that a little bit, please?

50:05

**Jennifer Duane:**

Well, first of all, I'll just point out that there is no matching requirement for this program. We are giving additional consideration for those applications that do include a match with it. With the American Rescue Plan Fund, as a general matter, if you're contributing a match, they must be from non-federal sources. Now there'll be certain statutes, federal statutes, that will expressly state that funds from that particular program can be used as a source of the nonfederal cost share. With the *American Rescue Plan*, I don't know that that has that specific language in.

50:58

So what we'll be doing is encouraging – if you want to use that as a match [and] to have [it] considered, point us to the language that might indicate that these funds may be used for match, but keep in mind that it needs to be very explicit in language saying that pretty much these funds may be used as match in another federal program. So I think that's the guidance we can offer. We do have an FAQ on this question that will be coming out in our one of our next rounds that we'll go into a little bit more detail on this.

51:33

But as for any other source of funds from a federal program that you want to try to contribute to match share, it there must be specific language in the statute that allows for that usage.

51:48

**Sarah Bleau:**

Thank you, Jennifer. I'd like to point out that there is an extremely thoughtful and thought-provoking question in here and I want to acknowledge the person who's posed the question because it's a very long question about NEPA and the webinar that we did yesterday and FONSI and 40 CFR 1508.13.

52:09

There are a lot of questions in here and then I'm going to send that to our FAQ team. I just want you to know for as much time as you put into typing that question, I'm not overlooking that. That was a very thoughtful question, and we will respond to it in our FAQs. So thank you for posting that.

52:32

But since we were just thinking about NEPA. Amanda, the question was asked if you could please clarify what extraordinary circumstances for the CATEX exclude – what the category exclusion, if you can talk about the extraordinary circumstances please?

52:52

**Amanda Pereira:**

Absolutely. So extraordinary circumstances are characteristics of an action that mean it will not qualify for a categorical exclusion, even though, on its face, it might look like it does.

53:04

And so an example of that would be, let's say you're planning on putting up a 50 foot monopole communication tower. The ground disturbance is going to be half acre, something like that. That is something that I believe does qualify for categorical exclusion. But if you are doing it in a place that's adjacent to a wetland or in an area where it might have impact on a threatened or endangered species, those characteristics mean that you can't say that it will have no significant impact without analyzing the project.

53:41

So in that instance, a categorical exclusion would not be appropriate for the project because there would be certain characteristics at that action that mean that you it can't say it has no impact. And so, extraordinary circumstances are defined in an agency's NEPA implementing regulations. So, the Department of Commerce does have the implementing regulations, and it does have categorical exclusions that have been defined. And I believe that also extraordinary circumstances that accompany those that should be locatable online. But what I can also do is make sure that that information finds its way into the FAQs so that applicants will have that information available.

54:24

But an extraordinary circumstance is just basically something that is a little bit different about the circumstances surrounding a specific action, that mean that something that might generally have no impact can't necessarily be said to have no impact.

54:41

**Sarah Bleau:**

Thank you, Amanda. That was very helpful.

54:45

Ming, there are some questions that are coming in for you. And one of them is the question if historical financial data or audited financial data is required as a part of this application.

**Ming:**

55:01

Thank you for the question. First of all, I think this question is kind of already addressed in the FAQ, but I'm going to elaborate on that here again.

55:10

So, the question is, no. Historical financial data audit [and] financial data are generally not required to be submitted in the application package. However, in our NOFO, we have a section in section 4B 11. It does require a pro forma financial information analysis, such as balance sheet, income statements or cash flow, statement of cash flow.

55:39

So, basically, what we need is a detailed budget, project budget and other cost details of the project, including some financial analysis, revenues, and expense projection.

55:56

Describing basically what federal financial assistance is needed for the implementation of the covered broadband project. Just one thing to know in terms of audit financial statements. Just please note that certain grantees are required to submit annual audit documentation to the federal audit clearinghouse to satisfy 200 subpart F. So that is not part of the application submission package, but some grantees are required to submit the audit statements to the federal clearinghouse.

56:38

**Sarah Bleau:**

Thank you, Ming. There was a question that came in right after that as you were talking that was about the pro forma and the level of detail. Is there anything that you would want to add to your response there, more about the pro forma?

56:53

**Ming:**

Sure, I'll try to elaborate a little bit on what level of detail will be required. So, in addition to that, whatever you think that is helpful for the NIST and NTIA team to evaluate the viability of the project, and make sure that there's financial stability to execute the project that you are applying [for].

57:20

**Sarah Bleau:** Thank you. Alright, Tim? I think that your demonstration of the Indicators of Broadband Need map was a hit, and a question came in for you: what is the underlying GIS technology platform for that map? Can you talk about that for a little bit, please?

57:47

We are not hearing you.

57:55

**Tim Moyer:** So, the Indicators of Broadband Need map is derived from the National Broadband Availability Map Program. We actually leverage ESRI's GIS platform. And so, for the NBAM itself, we use the ESRI managed Cloud service. That's our underlying secure GIS platform that has a ton of data. The Indicators of Broadband Need is derived from that, aggregated, and uses ARC GIS online capabilities.

58:27

**Sarah Bleau:** All right, Thank you.

58:30

OK, Jennifer, here's a question that I think has come up in the FAQs. And it's when we talk about the covered partnership. And the question is if a broadband provider is partnering with a state for one project, can that same provider partner with a local government for another project?

58:53

**Jennifer Duane:** So we're limiting the political subdivision or the state to file a single application. We are allowing the fixed broadband service provider piece of the covered partnership to be involved with multiple covered partnerships. And it could be within one state or it can also be involved in other states as well and partnering with states and political subdivisions within those states.

59:27

**Sarah Bleau:** OK, thank you. And I want to thank this next person who has clearly read through the FAQs. Jennifer, we've talked about RDOF. And the question here is that many of our FAQ responses have attempted to respond to the eligibility of blocks that might have been designated by an RDOF auction win, but the answers seemed a little bit vague.

59:53

This person is wondering, it says "these blocks represent tentative awards that have not been finalized. If the award for such a block has not been finalized and no build commitment is yet in place, can such a block still be considered eligible for grant funds?"

1:00:13

**Jennifer Duane:** So under the definition of unserved in our Act, it talks about unserved being lacking qualifying broadband service. And then having a broadband service provider who has been receiving or selected to receive funding

under federal or state support. So if the RDOF award is still in preliminary phase, then it wouldn't necessarily meet that definition of being subject to enforceable buildout commitments. So, I think we wouldn't rule it out. We'll take a closer look at where that RDOF coverage is and seeing what the applicant is proposing versus what a RDOF awardee has been proposing. We're also closely coordinating with the FCC and USDA RUS to make sure that we are not duplicating funding. That is a requirement in our statute to avoid duplicating federal funding.

1:01:12

We really want to do target the limited funding available under this program to areas that are truly unserved. So we're going to be closely coordinating with our federal partners to make sure that we are not duplicating funding. So, all that is to say that it's going to be very case-by-case driven in our analysis depending on what the applicant is coming in with, what the RDOF tentatively has been awarded, and, we're going to do our best to just make sure that we're not duplicating federal funding.

1:01:42

**Sarah Bleau:** OK, Jennifer, kind of drilling into that a little bit more. I know that there's this concept of eligible service area when we think about unserved. And the question that came in is whether we could explain please what, and I'll quote, "the specific area" refers to in item B in the definition of unserved.

**Jennifer Duane:** The specific service area or the eligible service area?

**Sarah Bleau:** Specific.

1:02:16

**Jennifer Duane:** And that's in the definition of eligible service area?

1:02:20

**Sarah Bleau:** This question is asking about the specific area.

1:02:25

**Jennifer Duane:** So the specific area, meaning the proposed service area that the applicant is proposing?

**Sarah Bleau:** I think that that's the intent here.

1:02:36

**Jennifer Duane:** And what was the question, again?

1:02:38

**Sarah Bleau:** Regarding the definition, can you explain what is "the specific area?"

1:02:46

**Jennifer Duane:** OK, the specific area – an applicant will designate a proposed service area as part of their application. And that's what we'll try to determine, whether that proposed service area meets the definition of eligible service area, as defined in the Act.

1:03:05

**Sarah Bleau:** OK, I think that it was an interpretation question.

**Jennifer Duane:** Yeah, and we can always take it back and address it through an FAQ too if I'm not understanding the question precisely.

1:03:20

**Sarah Bleau:** OK, thank you. Tim, going back to the map, can you talk a little bit? There is a request whether or not the data is available for download as a shape file, or if not, do the CSV data entries contain GEO ID information?

1:03:44

**Tim Moyer:** So, the data is only. (*Loses connection*) These are third party datasets. So, we're not the originators of the data, so we have brought them together. So that's what we have. If we can get a follow up question sent to us, I may be able to find some tips on geolocation, but I wouldn't have that at my fingertips.

1:04:17

**Sarah Bleau:** OK, and, Tim, can you please repeat what the e-mail address is to send mapping questions?

1:04:25

**Tim Moyer:** Sure, it's [NBAM@NTIA.gov](mailto:NBAM@NTIA.gov).

1:04:32

**Sarah Bleau:** Thank you. OK, Amanda, there's a question here or a request if we could paste links to the NTIA procedures for implementing NEPA. And I realized that we might not be able to do that on the fly right here. But when you were talking about contributing to the FAQs, can you maybe add a few points there?

1:04:57

**Amanda Pereira:** I can. One thing just to be very clear about though. So currently NTIA is developing procedures. It does not have its own. So, for this program, at least, for the time being and the foreseeable future, NTIA will be using the Department of Commerce's NEPA implementing instructions and its categorical exclusions that were defined. And I actually do have that Federal Register Notice here, so I can pop them in the chat. So just to be clear, NTIA does not currently have its own, that is something that is underway and but that's potentially a long process.

1:05:34

So for purposes of this program will be using the Department of Commerce's categorical exclusions, and you can certainly refer to those just to kind of give you a sense of what the lay of the land is.

1:05:46

**Sarah Bleau:** OK, thank you.

1:05:50



Jennifer, I know that we've talked about whether or not satellite service is a possible solution before and you've responded to that quite a few times in the FAQs. For the benefit of everybody who's here today, can you just speak for a few moments? The question is many rural areas only have the option of satellite internet; is satellite internet accessibility a potential project area disqualifier?

**Jennifer Duane:**

Well, our program is supposed to be competitively and technologically neutral, that's in the definition of the covered broadband project that we'd be funding. Satellite can be an option.

1:06:30

We do have a requirement that it can provide qualifying broadband service with and sufficient to support real-time, interactive applications. And there is a latency standard that we're applying.

1:06:43

So, to the extent that satellite coverage can meet at those qualifying broadband service conditions, it could be potentially a project that we would look at under the program.

1:07:00

**Sarah Bleau:**

OK, thank you. I think the key there is that where we are technology neutral. right?

**Jennifer Duane:**

Right, so we're not ruling it out, but we are trying to make sure that it's capable of providing qualifying broadband service, which is the standard in our core statute.

1:07:16

**Sarah Bleau:**

Thank you. Ming, here's a question that is right up your alley. And the question is this: as required by the NOFO and OMB's uniform guidance, how can or must applicants allocate their costs? Specifically, to what extent can costs be lumped together and/or deviate from the buckets set forth by NTIA?

1:07:42

**Ming:**

Yeah, I think that's a good question. So, the NOFO requires the use of the Standard Form 424 C budget form and the applicant can follow the format. But the budget narrative of the budget form – the cost must be itemized and explained in detail, and supported with the justification to determine the costs of allowability or are applicable to the project. I think the SF 424 C form has a very specific description of the cost of codifications. The costs best fit into those categories that can be included in those categories.

1:08:31

**Sarah Bleau:**

But the key thing is that you have to put down the budget costs in each of the categories and support it with a justification and explanation of the costs.

OK, thank you. One of the fun things about moderating these webinars is watching the questions roll in as the panelists are responding to their questions. You can see the sparks fly in your minds as these questions come in. So, thank you. Amanda, there was a question to follow up on your statement a few minutes ago.

1:09:06

The question is: So NTIA will not be using the FirstNet NEPA procedures?

**Amanda Pereira:**

1:09:11

That is correct.

**Sarah Bleau:**

1:09:13

OK, good. Thank you for clarifying.

1:09:19

All right, I am going to get back over to you, Jennifer. There are a lot of questions still coming in as people are thinking about what their application is going to look like.

1:09:32

We spoke yesterday and we've talked in the FAQs about duplicative funding and figuring out when you partner, do you have to understand all the ins and outs of whether or not additional funding has been provided. So, the question is here is whether the applicant is obligated to determine whether any third party has received funding to deploy broadband in the same service area as the proposed project?

**Jennifer Duane:**

1:10:03

I mean the requirements indicate that the covered partnership report on the fixed broadband service provider's receipt of funds as part of the covered partnership for that proposed service area. It doesn't necessarily require applicants to try to determine who else has been receiving funds.

1:10:25

That's something that we'll try to work with in coordinating with our partners at RUS and FCC in terms of trying to understand who has received federal funding for a particular service area.

**Sarah Bleau:**

1:10:40

OK, thank you. And on the end of that, a question came in: [whether] broadband providers are required to list all of the federal funding that they have received even if it's in another area separate and apart from the proposed project.

**Jennifer Duane:**

1:10:57

No, it's just for the particular proposed service area, if they've received federal funding for that proposed service area that the covered partnership is proposing to serve as part of their covered broadband project.

**Sarah Bleau:**

And is that just primarily to make sure that we're not overbuilding or duplicating funding?

**Jennifer Duane:** Right, yes,

1:11:22

**Sarah Bleau:** OK, on that note, if a project is going to offer 25/3 and a proposed service area, the question came in if the service provider could still offer lower packages like 10/2 for lower prices. Is that a possibility?

1:11:42

**Jennifer Duane:** The threshold that we're looking at is qualifying broadband service, which is 25/3 and with a sufficient latency to support real time interactive applications. So that's the threshold broadband service benchmarks that we're looking to fund under this program.

1:12:03

**Sarah Bleau:** So if that were the solution, then it would be the provider offering 10/2 on their own. Is that fair to say?

1:12:09

**Jennifer Duane:** Yeah, we wouldn't probably fund that if they were only going to be [offering 10/2]. It wouldn't meet our definition of providing qualifying broadband service in the area.

1:12:22

**Sarah Bleau:** OK, thank you.

1:12:27

Tim, taking a look back at the map, the question that's come up is about the accuracy of the data. Can you talk a little bit about why we selected the layers that are available on the Indicators of Broadband Need map and how accurate is the data?

1:12:45

**Tim Moyer:** So one of the things we looked at, we started with the 477 data. That's self-reported data from ISP that goes directly to the FCC biannually. We know that there are challenges with the census block methodology, where if anybody served, if one person is served, the whole block is served.

1:13:01

And so, we decided to do was kind of flip the switch and look at it from the perspective of ISPs have self-reported that they do not have 25/3 and we figured we could take that to the bank. So we're going to use that as a starting point.

1:13:16

Then, we took some of our indicators of need, recognizing that no singular dataset is perfect. But it's the combination of the layering of things that they can reinforce each other. And so, you look at the Microsoft data, and if you go to our Indicators of Broadband Need map on the About section,

there's direct links back to the source material [and] you can learn about the methodologies. I won't get into that here.

1:13:37

But that Microsoft data is basically machine to machine. We're asleep at night and it captures your download information. So, whether or not folks sign up for the service, that's not the question, it's saying that that experience is not getting 25 [mbps download].

1:13:54

You look at the Measurement Lab speed test data, very well respected, it's pulled together lots of non-profit sources, also with the Google and stuff like that. So, they've got a methodology [that's] little bit different than Ookla's. So we kind of captured two flavors of speed test which you found interesting also. And then Ookla itself is a very well-respected speed test. One of the known challenges with speed tests in general is that they are user driven.

1:14:21

You have to have somebody take a speed test, and so does the absence of a speed test tell you something? Well, it can tell you there's not infrastructure or they're going to tell you that nobody's taking the speed test. So, that's why we want the combination of the three different indicators of need, and also bringing in the survey data. ACS is obviously the census is a five-year ACS data where they update every year and then have a running five-year trend. It is very well respected and has good information there – taking that survey data about whether or not they had access, and again that access is how does that individual interpret it?

1:15:01

Do I not have infrastructure, or am I not signing up? The bottom line is we're looking at indicators of whether or not there's a digital divide – it could be access, it could be use. So we're not being definitive, to say that. So we feel confident about the datasets we chosen as an indicator of need, not a definitive or determinant, saying that we're going to use these for funding decisions like that. That's not the goal of this map. It's to better highlight potential availability gaps in the digital divide.

1:15:34

**Sarah Bleau:**

Thank you, Tim. Fun to listen to somebody who is so passionate about mapping. I mean, I like playing with maps, too. So go check it out if you haven't had the chance, it is pretty fun.

1:15:48

Just a heads up, Amanda, there's a comment here that the link to the DOC's NEPA implementing instructions – somebody posted that there was a broken link. And then, that same person posted a statement pointing to [NEPA.NOAA.gov/procedures](http://NEPA.NOAA.gov/procedures).

**Amanda Pereira:**

1:16:05

The link with the department administrative order, which is 216.20, that should work. In the Federal Register Notice, they were referring to a previous iteration because the Federal Register Notice System is from 2009. So, a few things have shuffled since and so I apologize for that. We can definitely put everything that's as up to date as we can possibly make it in the FAQs, we will definitely do that.

1:16:36

For the Department of Commerce, all NEPA compliance used to be delegated down to NOAA.

1:16:42

So, you'll find a lot of departmental NEPA structure was originally designed for NOAA. And so that's why you'll see a lot of things point back to NOAA when they're talking about something that's at the departmental level. But probably around, I'd say, 10 years ago or so, NOAA said that it was no longer feasible for them to continue to perform that function for the entire department. And there are several components within DOC that did have that capability to do it themselves including FirstNet and EDA.

1:17:16

And so, then that that was around the time when the department decided that it was appropriate for them to create their own categorical exclusions in the NEPA infrastructure, if you will, to provide a framework within which every component of Commerce could take advantage of a NEPA compliance structure if they needed it instead of relying on NOAA to do that. So that's why you will see some of that. It may be a little bit confusing, but we will provide anything that is up to date and as clear as possible in the FAQs. But that's why the Federal Register notice contains a link that doesn't work.

**Sarah Bleu:**

1:17:52

OK, thank you. You received a standing ovation here, thanking you for that. Thank you for explaining that. And I want to point out that somebody made a statement here thank you for putting together these informative sessions, and I really want to thank you, the audience, for these questions.

1:18:12

Because this makes it really exciting to be part of this program, and see the thoughts and ideas that are coming in. So keep sending the questions in.

1:18:24

Jennifer, we've talked about this program is good for a year, that there are extensions because we understand that construction sometimes takes more than a year. We know that there are issues with supply chain currently. It's hard to get materials. It's hard to find labor, sometimes, so there's that understanding. The question keeps popping up is if this grant will be available again next year?

**Jennifer Duane:** 1:18:54  
Well, we're not getting new funding. So, what we have available to you under this program, the \$288 million, is what we have to expend. There's a possible chance that there might be future grant funding, but for the purposes of this program, we have the \$288 million. The initial award period is for one year because that's required in the Statute. It says you have a year after the receipt of funds to expend it.

1:19:23  
As I mentioned, we expect that we're going to have to give extensions on the construction projects, a lot for the reasons that Amanda has been talking about with the environmental considerations. So the funding will be available. It doesn't expire, it doesn't go away, but we just need to take care of it. Once we get an extension requests from applicants and they tell us how much additional time they're going to need to complete their construction project, then we can amend the award given no cost extension and get them additional time to complete the project.

**Sarah Bleau:** 1:20:01  
Thank you. Ming, I wondered if you could spend a few minutes talking about the indirect costs.

**Ming:** 1:20:12  
Just the indirect costs itself?

**Sarah Bleau:** As an administrative expense.

**Ming:** 1:20:19  
So there are two parts of costs, either direct or indirect.

1:20:26  
So, indirect costs [are] basically covering some administrative costs that cannot specifically [be identified as] allocated to a project, so those can be part of the indirect costs. However, there is some direct costs, and they say the expenses directly related to personnel fringe, the people who are allocated to the project – those can be charged as a direct cost which is included in the Direct Administrative Expenses section.

**Sarah Bleau:** 1:21:01  
OK, thank you. OK, Amanda.

**Ming:** I just want to add one thing there. However, when you [are] allocating direct and indirect make sure that the cost [is] be consistently charged either direct or indirect, but not double charged or inconsistently charged as both. That's a key thing to note.

**Sarah Bleau:** 1:21:30  
Yep, OK, thank you. Amanda, there's a question for you here.

1:21:36  
If the IPAC files are pulled for the proposed project area, is that sufficient to meet the environmental review?

**Amanda Pereira:**

1:21:45

It's not sufficient, but it is very helpful. It certainly helps us to have an understanding of the context and the physical surroundings because it'll give you information about threatened and endangered species that are potentially in the project area, wetlands [and] things like that. If it's a system that you're comfortable using then absolutely, please do include that, that'd be very helpful. If it's not something you're familiar with, or if it's something that you're not comfortable using, that's not going to harm you in any way. The more descriptive information you can provide us, the better.

1:22:17

So, it's great if you want to include it, but it's not a requirement. That thorough project description and supporting visual documentation is really what we hope everybody can kind of have a baseline of comfort with, anything as a bonus is great.

**Sarah Bleau:**

1:22:34

OK, thank you.

1:22:37

This question here is kind of for Tim and Jennifer at the same time. There's a statement or a question, if a covered partnership has received many complaints about slow internet in an area and Ookla speed test information is the only information that shows the area is eligible, is that sufficient evidence to submit an NTIA grant application?

**Jennifer Duane:**

1:23:07

I think that that's one indicator. There's a couple of other data sources – we have the NBAM. The Indicators of Broadband Need is not the NBAM. The NBAM much more detailed information in it. We have other sources to consult. I would hesitate to say it is definitive, because we're going to be looking at a lot of different sources of data to determine whether a proposed service area is eligible for funding under the program.

1:23:37

And, Tim, if you have anything else, please chime in.

**Tim Moyer:**

1:23:41

So, the Indicators of Broadband Need is a derived work. It's aggregated at the county, census tract, and the census block level.

1:23:50

When it comes to that Ookla data within the NBAM itself, which is that closed platform for our state and federal partners. We've got 37 state partners, we're working with USDA [and] other federal partners. We have Ookla speed test data down to 100 square meter hex spin so we can drill into a census block and get a sense of what the user experience is there. We are in the process of acquiring other survey data that can help inform. We have more tools in our arsenal within the NBAM than we have in the Indicators of Broadband Need. And again, IBM, the Indicators of



Broadband Need is more about highlighting potential discrepancies in the digital divide. It's not meant to be the decisional tool. Even the NBAM itself is not a decisional tool, it better informs those decisions so that we can get more information and ask more questions. In some cases, it requires more drill down.

1:24:52

**Sarah Bleau:**

Yeah, I think we all want to bring at least 25/3 to everybody. So whatever tools we have, let's go apply and do it. All right. I've got one last question here unless anything rolls in as I'm targeting this last question for Jennifer.

1:25:11

The question came in, if a recipient finishes a project and has extra unused fiber or other materials, what happens to those materials? Can the partnership sell or IRU the extra fibers?

1:25:31

**Jennifer Duane:**

Well, if it's assuming that that material was paid for with the grant funds, though, a federal interests will attach and in that property. So, the NOFO contains references to uniform administrative requirements and other regulations, and it talks about the property trust relationship that is derived from using federal funds to purchase property.

1:25:59

I think that you could potentially keep some of that as spare equipment, in case the recipient needs [it] in the future. If it's truly not useful or not being used for the project, then you would submit a request to NIST's grants office and NTIA for disposition instructions as to what you should be doing with this property. There's a couple of options that the regulations have. We could we could direct you to sell it and reimburse the federal government for the fair market value of the proceeds consistent with the federal share of the projects into this.

1:26:43

This program could potentially be 100% federal share since there's no matching requirement. Then you would this be responsible for reimbursing the federal government if you sold the property.

1:26:58

So, the bottom line is just come in, let us know if you if it's truly not used and useful because there are a couple of options under the regulations. And the NIST's grants office and NTIA will work together to provide disposition instructions.

1:27:13

**Sarah Bleau:**

OK, thank you. I do have one last question here, and it's if SBA or ARFPA funds can be used as match?

1:27:24

**Jennifer Duane:**

I think that gets to the earlier question, and we'll have an FAQ on this as well.

1:27:30

The bottom line is there's no match requirement, so you don't have to provide a match. It just will get you some additional points in the evaluation criteria if you're leveraging nonfederal sources. And that said, the sources have to be nonfederal. So, we're looking to if it's a federal source of funds, we need to see in the statute where it expressly allows those federal funds to be used as a cost share in another federal program.

1:28:05

So, as I mentioned, will provide a FAQ that gives some more detail on it. But it's very case-specific determination because it really depends on what statute or program that you're seeking to use these funds to contribute to this program. It's going to be kind of a case-by-case determination. If you want to try to use these funds from another, tell us where it says in whatever program this is for, that these funds can be counted as a cost share for another federal program.

1:28:41

**Sarah Bleau:**

I feel like we should be going, yay! No match required! Then just let us know what you're planning

**Jennifer Duane:**

And you can certainly contribute these funds to your project, it just wouldn't be counted as match. But if you have funds and you want to use them to deploy a bigger broadband project because you have these funds, certainly bring them to the table.

1:29:05

You know, in your SF 424 I think it says you can report them in there as costs that are not being covered by costs not allowable for participation. And it just means that it's not covered in federal funds. So, we're not saying don't bring these funds to this program, it's just they wouldn't necessarily be counted as match if they weren't expressly allowable. So, you wouldn't get those extra points in the evaluation criteria. But it's certainly, if you're able to do more because you had the funding, definitely bring that as part of your project proposal.

1:29:43

**Sarah Bleau:**

Thank you. That will conclude our questions and answers for today. Anything that we didn't get to we'll take a look at the FAQs. Just a reminder that the presentation, a recording (so you can see all of our smiling faces again) and a transcript so that if maybe Amanda and Jennifer were explaining something that was pretty complex, you can actually read through what the answers were.

1:30:11

So all of that information will be posted to our website if you go to BroadbandUSA under Events-Past Events, it will be there by the 21<sup>st</sup> of July, so in less than seven days. So please go take a look.

1:30:27

And I'll also point out we thought that we would conclude the webinars in July, but we're not – we're going to be back here! So we'll be back here talking about the Broadband Infrastructure Program in August, and that's just in a couple of weeks. We realize that the applications are due on the 17<sup>th</sup> of August, so we're making ourselves available on August 4<sup>th</sup> & 5<sup>th</sup>.

1:30:53

We're going to do an overview again of the very important details about the program, and then we're going to talk about a lot of the questions that have come in over the last few months. So put that on your calendar.

1:31:06

Additionally, as I mentioned, the Tribal Broadband Connectivity Program next week on the 21<sup>st</sup>. We will be going over the Form 424 [and] covering a lot of details. So, I encourage you, if you're new to that form, please join us. Then we've got ongoing webinars for the Connection Minority Community Pilot program as well. These webinars always begin at 2:30pm Eastern, and you'll find more information if you go to our website. And on this last slide here you'll see contact information for us.

1:31:43

If you go to [BroadbandUSA@NTIA.doc.gov](mailto:BroadbandUSA@NTIA.doc.gov), then you can send us an e-mail. And there's a phone number too, if you'd like to call and talk to us, we'll be there. So, thank you again to our panelists for participating. And thank you very much to our audience for being a part of this and asking some great questions. It was good to hear from all of you. Thanks and goodbye.

END TRANSCRIPT.