

Middle Mile Grant Program Application Templates

*These materials have been compiled to support your work in completing the **Application for NTIA's Middle Mile Grant (MMG) program**.¹ All materials must be submitted through the NTIA Grants Portal <https://grants.ntia.gov>, however Eligible Entities are encouraged to use these forms and templates to prepare their submissions to NTIA. Note that some forms and templates will be uploaded directly in the original file format to the NTIA Grants Portal (NGP) and others will be directly entered into the NGP. For additional information, please see the MMG [Notice of Funding Opportunity](#) (NOFO).*

Middle Mile Application Materials

Applicant Information

1. **SF-424**
 - 1.1. **SF 424 (Application for Federal Assistance) – Inputted into NTIA Grants Portal**

This form will be filled out directly in the NTIA Grants Portal. You can find a copy of this form in the MMG Zip folder and instructions for completing the SF 424 can be found in the MMG Application Guidance. Applicants are encouraged to complete this form as a DRAFT prior to inputting the form contents in the NTIA Grants Portal.
2. **Organizational Details & Capacity**
 - 2.1. Type of entity: “(A) a State, political subdivision of a State, Tribal government, technology company, electric utility, utility cooperative, public utility district, telecommunications company, telecommunications cooperative, nonprofit foundation, nonprofit corporation, nonprofit institution, nonprofit association, regional planning council, Native entity, or economic development authority; or (B) a partnership of two (2) or more entities described in (A).”²
 - 2.2. Identify “Primary Applicant”
 - 2.2.1. If individual entity, default as primary
 - 2.2.2. If partnership, identify the other entities in the partnership and specify which entity is primary
 - 2.3. **Applicant will check Y/N:** Is parent/owner of applicant a foreign entity?³ If yes, please identify country.
 - 2.4. **Managerial Capability – Uploaded by Applicant**

Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities

¹ Paperwork Reduction Act (PRA) approved by Office of Management and Budget (OMB) No. 0660-0046, Exp. Date Nov. 30, 2022.

² See MMG NOFO at Sec. I.B.4 (May 13, 2022), *available at* <https://broadbandusa.ntia.doc.gov/resources/grant-programs/enabling-middle-mile-broadband-infrastructure-program>.

³ Ownership shall be reported consistent with the requirements set forth in 47 CFR 1.2112(a)(1)-(7).

that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.

2.5. Organizational Charts – Uploaded by Applicant

Each applicant shall submit any necessary organizational chart(s) detailing all of its parent companies, subsidiaries, and affiliates.

2.6. Open Field: 500 Word Organizational Details Narrative – Inputted into NTIA Grants Portal

Each applicant must also provide a narrative describing the applicant's readiness to manage a middle mile broadband network. This narrative should describe the experience and qualifications of key management set to undertake this project, the applicant's experience undertaking projects of similar size and scope, recent and upcoming organizational changes including mergers and acquisitions, and relevant organizational policies.

This narrative shall denote who will own the assets at the end of award period.

3. Required Documents

3.1. Form CD-511 (Certification Regarding Lobbying) – Uploaded by Applicant (Fillable Form Required)

The applicant must upload a completed form that certifies that Federal funds have not and will not be used for lobbying in connection with this request for Federal financial assistance. A fillable Form CD-511 can be found in the MMG ZIP folder.

3.2. Standard Form-LLL (Disclosure of Lobbying Activities) – Uploaded by Applicant (Fillable Form Required if Applicable)

Standard Form-LLL must be completed and submitted for those applicants that need to disclose lobbying activities that have been secured to influence the outcome of a Federal action. A fillable Form SF-LLL can be found in the MMG ZIP folder.

3.3. SAM.gov Registration – Uploaded by Applicant

Applicants are asked to upload a screenshot of their SAM.gov registration.

Project Information

1. Project Details

1.1. Open Field: 1000 Word Executive Summary – Inputted into NTIA Grants Portal

1.1.1. Please describe how the applicant's proposal will advance the objectives of the MMG Program, as well as the specific objectives outlined in the Notice of Funding Opportunity (NOFO);

1.1.2. An overview of the proposed route or service area(s), including information regarding rurality and socio-economic indicators in the area to be served by the proposed project; and

1.1.3. A description of the level of need in the proposed service area(s), including communities considered unserved and/or underserved in the proposed service area(s)

1.2. Level of Need Narrative – Uploaded by Applicant

1.3. A description of the level of need in the proposed service area(s), including but not limited to communities considered unserved and/or underserved in the proposed service area(s), discussion of the competitive landscape in the area, variations among

service areas if there are any, or the general economic conditions in the proposed funded service area. **Check Y/N:** “NTIA strongly encourages prospective non-state applicants to coordinate and consult with the State Broadband Office or other coordinating body located in the jurisdiction in which the eligible entity proposes to deploy middle mile infrastructure to ensure that the proposal is consistent with the state’s broadband plan and priorities. Please confirm collaboration and consultation.”

1.4. Open Field: 500 Word Government and Community Involvement – Inputted into NTIA Grants Portal

Please provide information on the applicant’s coordination with applicable State, Territory, Tribal, and local governments, including their awareness of the proposed project and any potential impact to respective service areas; and Information regarding the applicant’s involvement and coordination with community organizations or other relevant partners in the proposed service area

1.5. Prioritization

Each applicant must make a binding commitment to prioritize at least one of the following via the funded middle mile network. The commitment should be described in the Executive Summary.

- 1.5.1. Check Y/N:** Connecting middle mile infrastructure to last mile networks that provide or plan to provide broadband service to households in unserved areas;
- 1.5.2. Check Y/N:** Connecting non-contiguous trust lands; or
 - 1.5.2.1.** If yes, please describe
- 1.5.3. Check Y/N:** The offering of wholesale broadband service at reasonable rates on a carrier-neutral basis.

1.6. Statutory Purpose

Each applicant must attest and demonstrate that it will meet at least two of the following five requirements

- 1.6.1. Check Y/N:** The eligible entity adopts fiscally sustainable middle mile strategies.⁴ This strategy should be described in the Budget Narrative.
- 1.6.2. Check Y/N:** The eligible entity commits to offering non-discriminatory interconnect to terrestrial and wireless last mile broadband providers and any other party making a bona fide request. This policy will be described in the Interconnect Policy.
- 1.6.3. Check Y/N:** The eligible entity identifies specific terrestrial and wireless last mile broadband providers that have(i) expressed written interest in interconnecting with middle mile infrastructure planned to be deployed by the eligible entity; and ii) demonstrated sustainable business plans or adequate funding sources with respect such interconnection. This may be demonstrated in the Level of Need Narrative.
- 1.6.4. Check Y/N:** The eligible entity has identified supplemental investments or in-kind support (such as waived franchise or permitting fees) that will accelerate the completion of the planned project. Such acceleration may be described in the

⁴ In particular, applicants should submit with their application financial studies, analyses, or other materials demonstrating that reasonably anticipated revenues associated with middle mile projects that are constructed, improved, or acquired using MMG Program funds will be sufficient to allow long-term provision of service in light of reasonably anticipated costs. The required documentation includes organizational historical financials, audited financials, pro-forma financial projections and analysis to substantiate the sustainability of the proposed project, and submission of a letter of credit valued at no less than 25 percent of the requested award amount.

Project Timeline Narrative.

- 1.6.5. Check Y/N:** The eligible entity has demonstrated that the middle mile infrastructure will benefit national security interests of the United States and the Department of Defense. The benefits may be explained in the Benefitting National Security Interests Narrative.

1.7. Open Field: 200 Word Benefitting National Security Interests Narrative – Inputted into NTIA Grants Portal

Relevant considerations here include, but are not limited to, whether the funded middle mile infrastructure will increase the redundancy and resiliency of telecommunications networks that support broadband services, other commercial telecommunications services, protection of other critical national infrastructure (e.g., the national power grid and power transmission facilities), border security, or other physical infrastructure sensor and monitoring.

1.8. Project Timeline

- 1.8.1.** Drop down “Number of Years” (1, 2, 3, 4, 5)

1.9. Open Field: 500 Word Project Timeline Narrative – Inputted into NTIA Grants Portal

This upload is REQUIRED of all MMG Applicants. The narrative requires the Applicant to describe a project with critical path, including key milestones for implementation of the project, preparations, and risk factors; and a capital investment schedule evidencing that the applicant will complete build-out and the initiation of service within five years of the date on which the entity receives the grant and will meet interim buildout requirements set forth herein and in any other binding document.

Eligible entities that receive a middle mile grant shall demonstrate to the satisfaction of the Assistant Secretary that they have completed the buildout of 40 percent of project miles by the end of the second year after the award date, 60 percent of project miles by the end of the third year, 80 percent of project miles by the end of the fourth year, and 100 percent of project miles by the end of the fifth year. For the sake of clarity, the project must be completed, lit, and operating no later than five years after the date of the award.

If the project is able to be accelerated with supplemental investments or in-kind support to meet a statutory purpose, this should be explained.

The Applicant will demonstrate completion objectives. The Applicant should consider such project areas as: a) network design; b) securing all relevant licenses and agreements; c) site preparation; d) inside plant deployment; e) outside plant deployment; f) deployment of business and operational support systems; g) network testing; and i) network operational.

1.9.1. Check Y/N: “Is an extension being requested?”

1.10. Open Field: 200 Word Extension Narrative – Inputted into NTIA Grants Portal

An eligible entity may submit a request for an extension, which must include the justification for such an extension and all relevant circumstances. At the request of an

eligible entity, the Assistant Secretary may extend the buildout deadline by not more than one (1) year if the eligible entity certifies that:

- (i) the eligible entity has a plan for use of the grant funds;
- (ii) the project to build out middle mile infrastructure is underway; or
- (iii) extenuating circumstances require an extension of time to allow completion of the project to build out middle mile infrastructure.

1.11. Tribal Certification and Supplemental Information

1.11.1. Special Rules for Tribal Governments and Native Entities

The Infrastructure Investment and Jobs Act permits the Assistant Secretary, in consultation with Tribal governments and Native entities, to waive, or specify alternative requirements, in connection with most directives governing the MMG Program if the Assistant Secretary finds that waiver or modification of the requirement is necessary for (a) the effective delivery and administration of middle mile grants to Tribal governments or (b) the construction, improvement, or acquisition of middle mile infrastructure on trust land.

1.11.1.1. Check Y/N if waiver or alternative requirements are requested

1.11.1.2. Upload waiver if applicable

- 1.11.2.** A Tribal Government may certify whether an area within its own Tribal Land is unserved or underserved based on criteria of its choosing. Any such Tribal Government must certify that the areas where middle mile service is proposed (including any such areas where a provider offers, or has proposed to offer, last-mile service) are unserved or underserved and provide a statement on Tribal Letterhead explaining how the determination that the area is unserved or underserved was made and additional supporting information if available.

1.11.2.1. Upload Certification, as applicable.

1.12. Program Details

1.12.1. Open Field: 500 Word Fair Labor Narrative – Inputted into NTIA Grants Portal

Applicants must have a demonstrated record of and plans to be in compliance with federal labor and employment laws. This will help ensure that projects are carried out in accordance with the law, assist NTIA in ensuring that a prospective awardee is capable of carrying out activities funded by an award in a competent manner in compliance with all applicable federal, state, and local laws; and promote the effective and efficient completion of high-quality middle mile broadband infrastructure projects by ensuring a reliable supply of skilled workers and minimizing disruptive and costly delays.

- 1.12.1.1.** In order for NTIA to evaluate an applicant's demonstrated record of and plans to be in compliance with federal labor and employment laws, each applicant must provide examples of items described in III.H in the NOFO. Applicants are asked to upload a Certification from an Officer/Director-level employee (or equivalent) of the applicant evidencing consistent past compliance with federal labor and

employment laws by the applicant, as well as contractors and subcontractors.

1.12.2. Open Field: 500 Word Highly Skilled Workforce Narrative

To ensure that applicants have the technical and operational capacity to carry out the project, applicants must submit a plan for ensuring that the project workforce will be an appropriately skilled and credentialed workforce (including by the applicant and each of its contractors and subcontractors). The plan for a highly skilled workforce should include the information described in III.I in the NOFO.

1.12.3. Open Field: 500 Word Advancing Workforce Development Narrative – Inputted into NTIA Grants Portal

A skilled workforce is critical to meeting infrastructure buildout timelines under the Infrastructure Act and connecting households across the country to reliable, affordable, high-speed broadband. A well-trained workforce will also allow for the safe deployment of sustainable networks. To meet the workforce needs of the MMG Program, applicants must make appropriate investments to develop a skilled, diverse workforce. Each applicant must provide as part of its application examples of items described in III.J in the NOFO.

1.12.4. Open Field: 500 Word Climate Resiliency Narrative – Inputted into NTIA Grants Portal Please demonstrate that the applicant has sufficiently accounted for current and future weather- and climate-related risks to new MMG Program infrastructure projects. In particular, each applicant should clearly demonstrate how it is conducting the items listed in III.K in the NOFO.

1.12.5. Civil Rights and Nondiscrimination Law Compliance

- 1.12.5.1.** Check Y/N: “Prior to distributing any MMG Program funding to a prospective awardee, NTIA will require the prospective awardee to agree, by contract or other binding commitment, to abide by the non-discrimination requirements set forth in III.L in the NOFO.”

2. Technical Capabilities

2.1. Certification of Technical Capability – Uploaded by Applicant

Each applicant must supply a certification attesting that it is technically qualified to complete and operate the proposed project.

2.2. Open Field: 500 Word Technical Overview Narrative – inputted into NTIA Grants Portal

Please describe targeted last mile service objectives, including last mile service provider letters of commitment, agreements, or contracts; and a description of the proposed service offerings, including the pricing of the services to be offered over the proposed facility.

- 2.2.1.** Applicants are encouraged to upload supplemental documentation.

2.3. Open Field: 500 Word Competitive Landscape – Inputted into NTIA Grants Portal

The Applicant should describe existing middle mile offerings in the area, if any, including competitor data if applicable. This should include a description of the proposed service offerings, including the pricing and technology of the services to be offered over the proposed facility. Where possible, Applicant’s project should be able to demonstrate a decline in

middle mile costs that are likely to flow through to consumer broadband prices.

2.3.1. Applicants are encouraged to upload supplemental documentation.

2.4. Open Field: 500 Word Interconnect Policy – Inputted into NTIA Grants Portal

The Applicant must describe in detail the nondiscrimination, interconnection, and network management practices that would be adopted for the project facilities. The Applicant should describe how it will comply with nondiscrimination and interconnection obligations, particularly with connectivity to the public Internet and physical interconnection for the exchange of traffic. In addition to describing network management practices, the Applicant should disclose any practices in place to block access to illegal or harmful content.

These nondiscrimination and interconnection requirements apply to components of projects that are funded by MMG. These obligations apply to the grantee, and do not apply to any existing network arrangements or to non-awardees using the network. However, the grantee may negotiate contractual covenants with broadband service providers to deploy or operate the network facilities and pass these conditions through to them. In any case, the grantee must have in place safeguards to ensure that the network nondiscrimination and interconnection obligations are met. The Applicant will include the URL to the publicly available interconnection policy and verify that such policy is to be offered in perpetuity.

2.5. Menu Selection: Drop Down Type of technology to be used in proposal: Fiber Optic Technology, Wireless, Other

2.5.1. Open field to explain other, if applicable

2.5.2. If fiber, check Y/N: Each applicant of an award to build middle mile infrastructure using fiber optic technology shall certify that the proposed project, upon completion, will include direct interconnection facilities that will facilitate the provision of lit broadband service, at speeds not less than 1 Gigabit per second for downloads and 1 Gigabit per second for uploads to anchor institutions located within 1,000 feet of the middle mile infrastructure.

2.5.2.1. If fiber, upload template “Template CAI”

2.5.2.2. Check Y/N: An eligible entity applying for a middle mile grant may seek, and the Assistant Secretary may grant, a waiver of the requirements set out in the previous paragraph, in full or in part, to the extent the eligible entity demonstrates that the requirement is not technically or economically feasible.

2.5.3. If wireless or other, allow capability to upload Template CAI.

2.6. Network Route Maps – Uploaded by Applicant

Applicants should provide a physical network map that includes the following (if applicable):

- 2.6.1. The Project Area and those unserved and underserved areas which it will enable.
- 2.6.2. Applicant's pre-existing service area that demonstrates current service levels.
- 2.6.3. The physical path of the network's transmission medium (e.g., backbone and lateral cable routes, microwave links), transmission type, technology, operating bandwidth, capacity (e.g., dark vs. lit strand count), and cable placement (e.g., aerial, burial) should be displayed.
- 2.6.4. Points of interconnection (purely passive and non-environmentally controlled nodes, e.g., splice points are optional):
 - Provider Facilities
 - Collocation Facilities
 - Private Interconnection Points with partnering service provider/private network
- 2.6.5. Wireless towers and associated coverage areas.
- 2.6.6. Anchor institutions within 1,000 feet, if desired.
- 2.6.7. Additionally, the maps should delineate between network and facilities that are:
 - Part of the Applicant's/key partners' existing network;
 - Proposed as part of this project;
 - Leased from a third party;
 - Utilized under some alternative arrangement; or
 - Relevant to interconnection with either Last Mile or Middle Mile service providers.

PLEASE NOTE: Only ESRI Shapefiles will be accepted and uploaded.

2.7. Data Submission Specification – Uploaded by Applicant (Template Use Required)

There is a template "Upload Template Data Submission Specification" which shall be uploaded. Applicants must complete the table with information for all interconnection points proposed for the network. This table has three required fields: Point Name, Latitude and Longitude. This should accommodate all of the points of interconnection (passive, non-environmentally controlled points of interconnection, e.g., splice points, may be excluded), collocation facilities, central offices, head ends, and other centralized facilities, network access points to Last Mile service providers, Internet peering points, and towers.

2.8. Network Logical Diagram – Uploaded by Applicant

The Applicant must provide network diagrams to be uploaded for the project including all of the network elements and the capacity, facilities, and mileage between each element. The diagram must clearly denote which of the network elements already exist. See examples below. The diagrams must also explicitly show:

- 2.8.1. The links between the network nodes. The types of facilities used in connecting all the network elements (fiber, copper, microwave, etc.).

- 2.8.2. Internet peering points, access to local exchange carriers and central offices and cable head ends.
- 2.8.3. The proposed aggregation node facilities that will provide the egress point(s) from the broadband backbone to the networks of the selected service provider(s), Last Mile service providers, and the selected Internet Service Provider(s) and any other value-added services that may be provided in the new infrastructure.
- 2.8.4. The points of interconnection and collocation facilities.

The Applicant should show how traffic originates on the network and flows through the network, delineating which protocols are used on each link, and which technologies and standards are used at each junction. The diagram should include capacity constraints for each network element. The following diagrams illustrate the required level of depth.

2.9. Open Field: 200 Word Environmental Narrative – Inputted into NTIA Grants Portal with Image Files Uploaded by Applicant

Any project-related activity that may adversely affect the environment must not be undertaken prior to the completion of the environmental review process prescribed by NTIA. Doing so may jeopardize consideration of the application.

All Applicants for MMG projects must comply with the National Environmental Policy Act, the National Historic Preservation Act, and the Endangered Species Act, and other applicable environmental regulations.

Please provide a service-area environmental description that describes the physical project area and its surroundings (e.g., disturbed or developed land vs. open space; adjacent natural resources, such as rivers, wetlands, or forestlands; and any protected lands or resources in or near the project area), including site photographs and aerial photographs (e.g., Google Earth or Google Maps images), if the project includes construction and/or ground disturbing activities.

3. Required Project Documents

3.1. Negotiated Indirect Cost Rate Agreement – Uploaded by Applicant if Applicable

This is a document published to reflect an estimate of indirect cost rate negotiated between the Federal Government and a Grantee's organization which reflects the indirect costs (facilities and administrative costs) and fringe benefit expenses incurred by the organization. This must be completed, if applicable.

3.2. Template Table of Funded Partners and Unfunded Collaborators – Uploaded by Applicant (Template Use Required)

List all funded and unfunded project collaborators, including partners, subrecipients, match providers, major contractors/supplies, details on role/scope of work for project. A fillable Template of Funded Partners and Unfunded Collaborators can be found in the MMG ZIP folder.

3.3. Certificate of Operational Capability – Uploaded by Applicant

Each applicant must supply a certification from an officer-level employee (or individual of comparable rank) attesting to the applicant's operational capability to complete and operate the proposed project.

If the applicant has provided a voice and/or broadband internet access service, it must supply a certification from an officer-level employee (or individual of comparable rank) attesting that it has filed FCC Form 477s and the Broadband DATA Act submission, if applicable, to the extent required during this time period and otherwise complied with the Commission's rules and regulations. Alternatively, the applicant must explain any pending or completed enforcement action, civil litigation, or other matter in which it was alleged to have failed to comply with Commission rules or regulations.

If the applicant has operated only an electric transmission or distribution service, it must submit qualified operating or financial reports that it has filed with the relevant financial institution for the relevant time period along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution.

Budget Information

1. Financial Information

1.1. Certification of Financial Capability – Uploaded by Applicant

Each applicant must supply a certification from an officer-level employee (or individual of comparable rank) attesting that it is financially qualified to meet the obligations associated with a project, that they will have available funds for all project costs that exceed the amount of the grant, and that they will comply with all MMG Program requirements, including service milestones.

1.2. Letter of Credit – Uploaded by Applicant

During the application process, each applicant must submit a letter from a bank meeting eligibility requirements consistent with those set forth in 47 C.F.R. § 54.804(c)(2) committing to issue an irrevocable stand-by letter of credit, in the required form, to the applicant. The letter shall at a minimum provide the dollar amount of credit offered and the issuing bank's agreement to follow the terms and conditions of NTIA's model letter of credit. NTIA shall publish on its website a model letter of credit substantially similar to the model letter of credit established by the Federal Communications Commission in connection with the Rural Digital Opportunity Fund (RDOF).⁵

NTIA will ensure, prior to issuing a middle mile grant award, that each eligible entity obtains an acceptable, irrevocable standby letter of credit in a value of no less than 25 percent of the award amount.

Each eligible entity shall provide with its letter of credit an opinion letter from its legal counsel clearly stating, subject only to customary assumptions, limitations, and qualifications, that in a proceeding under Title 11 of the United States Code, 11 U.S.C. §

⁵ Rural Digital Opportunity Fund Order, 35 FCC Rcd at 773-77, Appx. C.

101 *et seq.* (the “Bankruptcy Code”), the bankruptcy court would not treat the letter of credit or proceeds of the letter of credit as property of the winning bidder's bankruptcy estate under Section 541 of the Bankruptcy Code.

1.3. **Audited Financial Statements – Uploaded by Applicant**

Each applicant shall submit financial statements from the three prior fiscal years that are audited by an independent certified public accountant. If the applicant is not audited in the ordinary course of business, in lieu of submitting audited financial statements it must submit unaudited financial statements from the three prior fiscal years and certify that it will provide financial statements from the three prior fiscal years that are audited by an independent certified public accountant by an NTIA specified deadline.

1.4. **Historical Financial Statements – Uploaded by Applicant, if applicable**

2. **SF-424 C (Budget Information- Construction Programs) – Inputted into NTIA Grants Portal**

This form will be filled out directly in the NTIA Grants Portal. You can find a copy of this form in the MMG Application Zip folder and instructions for completion can be found in the MMG Application Guidance. Applicants are encouraged to complete this form as a DRAFT prior to inputting the form contents in the NTIA Grants Portal.

3. **Budget Narrative, Detailed Budget and Related Documents**

3.1. **Budget Narrative – Uploaded by Applicant (Template Use Required)**

Applicants will create and submit a budget narrative that adequately describes all proposed activities and costs for their grant-funded project. **Applicants must complete the file template (found in the MMG ZIP folder) fill in all required information, and upload the file.** The file must be uploaded as a Word file, and not converted to a PDF. You can find additional guidance in the MMG Application Guidance.

3.2. **Template Detailed Budget Justification – Uploaded by Applicant (Template Use Required)**

The Detailed Budget Justification spreadsheet must reflect the cost categories that appear on the SF-424 and SF-424C and include itemized calculations for each cost placed under those categories. A fillable Template Detailed Budget Justification can be found in the MMG ZIP folder.

3.3. **Template Pro Forma – Uploaded by Applicant (Template Use Required)**

Pro forma financial projection and analysis related to the project's sustainability, inclusive of subscriber (e.g., last mile network connections, other wholesale services), across an eight-year forecast period. A fillable Template Pro Forma can be found in the MMG ZIP folder.

3.4. **Check Y/N: “Any other funding provided for this project?”**

3.4.1. If yes, Open field: 200 Word Narrative – Inputted into NTIA Grants Portal