



## **BEAD Final Proposal**

**Draft for Public Comment**

## **Final Proposal - Draft for Public Comment**

### ***MESSAGE from the Director:***

On June 6, 2025, the National Telecommunications and Infrastructure Administration (NTIA) issued a Restructuring Policy Notice (RPN) that reshaped the BEAD program. The changes were swift and sweeping: the fiber preference was eliminated, the scoring framework was narrowed to cost alone, and critical evaluation criteria including affordability, community support, labor standards, and climate resiliency — were removed. Most notably, the demanding timeline for subgrantee selection was compressed into a 90-day window.

Faced with these constraints, the BEAM team — supported by contractual partners — worked with extraordinary urgency and precision. What you see in this Final Proposal is the result of that effort: a comprehensive, technically sound, and forward-looking plan that reflects our commitment to universal broadband service across Mississippi.

This achievement would not have been possible without partnerships developed with internet service providers across our state. These providers stepped up - responding to exhaustive data requests, tight deadlines, substantial financial commitments, and complex design requirements with professionalism and resolve.

Together, we are laying the foundation for a more connected Mississippi — one where residential broadband access is fundamental. The work reflected in this proposal will be life-changing for thousands of Mississippians, opening doors to education, healthcare, economic opportunity, and civic engagement.

As Governor Tate Reeves has said time and again, “Mississippi has momentum.” That momentum is unmistakable. With transformative investments from Avaio Digital in Brandon, Compass Datacenters in Meridian, and Amazon Web Services in Madison County, our state is rapidly becoming a regional magnet for cloud computing, artificial intelligence, and digital services. The broadband infrastructure outlined in this proposal is a critical part of that vision — enabling Mississippi to lead in the digital economy and ensuring no community is left behind.

We are proud of what this proposal represents. And we are even more proud of the future these projects will provide for Mississippi.



**Sally Doty, Director**

**Broadband Expansion and Accessibility of Mississippi**

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### Section 1

1.1: Text Box: Describe how the Eligible Entity's deployment Subgrantee Selection Process undertaken is consistent with that approved by NTIA in Volume II of the Initial Proposal as modified by the BEAD Restructuring Policy Notice.

#### Subgrantee Selection Process

The Mississippi Broadband Expansion and Accessibility of Mississippi (BEAM) Office implemented a structured, phased, and transparent Subgrantee Selection Process that balanced federal requirements with state priorities to ensure a fair and competitive award process that was consistent with that approved in Volume II of the Initial Proposal. The process was designed to accommodate evolving federal guidance while maintaining consistency, technical integrity, and adaptability across multiple rounds of intake.

#### Timeline of Key Activities

##### Program Milestone Timeline (Table Format):

#	Milestone Title	Description	Date
1	Letter of Intent Process Open to Prospective Subgrantees	The letter of intent (LOI) process was designed with a two-fold approach, to ensure that the pool of applicants had the necessary qualifications to undertake a BEAD subaward and to gauge interest in specific project areas.	November 18, 2024 – December 13, 2024
2	Challenge Process Results Approved	The BEAM Office worked closely with contractual support to respond to NTIA inquiries regarding the challenge process results to ensure that all appropriate information was provided to NTIA. Resolution of conflicting data for certain existing federal commitments extended this process.	May 8, 2025
3	Posting of Eligible Locations	Following the approval of the Challenge Process Results, BEAM posted the final Eligible Location Listing to the broadbandms.com website.	May 14, 2025

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#	Milestone Title	Description	Date
4	Application Round 1	Original Pre-RPN Application window opened. The original application timeline was to be the first 45 days of the 60-day application window laid out in BEAM's Initial Proposal Volume II.	May 15, 2025 – June 29, 2025
5	Restructuring Policy Notice (RPN) Released	The State of Mississippi is required to review and adjust the application process and scoring evaluations to align with updated NTIA requirements.	June 6, 2025
6	Unlicensed Fixed Wireless (ULFW) Evidence	As directed by the RPN, ULFW providers in the state of Mississippi are notified of a seven calendar day window to indicate intent to submit evidence that BEAD funding is not required for locations they serve. No notifications were received for intent to submit evidence.	June 10, 2025 – June 17, 2025
7	Letter of Intent Round Re-opened	In accordance with the RPN, the LOI prequalification round was reopened to encourage even more participation in the BEAD program.	June 11, 2025 – June 27, 2025
8	Benefit of the Bargain Round	BEAM's portal is opened to submit applications for all eligible applicants for the Benefit of the Bargain (BoB) round. BEAM informed all eligible applicants of the application submission due date via email. BEAM also held weekly office hours for providers during this window.	July 3, 2025, – July 17, 2025
9	Targeted Project Areas Round	Focused application round for specific project area units (PAUs) within Mississippi deemed to not have a viable priority broadband application.	July 28, 2025 – August 5, 2025
10	Supplemental Rounds	To meet the BEAD requirement of universal service, BEAM engaged in a supplemental competitive process for PAUs without a viable priority broadband application. BEAM contacted BEAD eligible providers with existing infrastructure in or adjacent to the PAU and opened a brief application period.	August 8, 2025 – August 15, 2025

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#	Milestone Title	Description	Date
11	Final Proposal Posted for Public Comment	The Final Proposal is published for public comment. Stakeholders and community members may review and respond.	August 27, 2025
12	State Comment and Objection Opens	Official window opens for state-level feedback and objections as required by MS State law.	August 27, 2025
13	State Comment and Objection Window Closes	Final deadline for state responses. All comments and objections were submitted by a specified due date.	September 3, 2025

### Subdivision of State into Project Areas

BEAM developed initial PAUs using county supervisor districts as a baseline geography, balancing administrative clarity with known community boundaries. Adjustments were made where necessary to account for natural geographic features, population centers, and to align with anticipated broadband infrastructure deployments. This approach allowed for reasonable project size and helped balance the State's goal of universal service with the economics of project areas for applicants.

### Application Process & Solicitation of Bids

BEAM's Subgrantee Selection Process began with the establishment of a Prequalification and non-binding LOI phase, which was required for all prospective applicants prior to submitting full applications. This initial step helped BEAM determine the pool of potential subgrantees, assess financial and technical capacity, and shape the development of project areas through an assessment of interest in the initial design of project areas.

Following the LOI Process, Round I of BEAD Applications opened on May 15, 2025, and closed on June 6, 2025. During this period, applications were being created, however none were submitted during the window in which it was open. This round was originally scheduled to close on June 29, 2025, however, was terminated upon release of the RPN (June 6, 2025), which significantly impacted how projects were to be evaluated. To ensure alignment with updated federal policy, BEAM closed the initial Round I application window and considered any applications from that round null based on the new guidance.

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BEAM then initiated a BoB Round. The application questions were adjusted to align with the Revised Policy Notice requirements. The BoB Round window ran from July 3, 2025, to July 17, 2025. 339 applications were received during the BoB Round.

Following the BoB round PAUs without a viable priority broadband application remained. In accordance with Initial Proposal Volume II, a second targeted PAU application round was implemented. Round II reopened for consideration of revised or newly scoped applications and ran from July 28, 2025, to August 5, 2025, with nineteen applications received. BEAM evaluated applications in accordance with the revised guidance and required updated internal scoring frameworks with all applications reviewed under a consistent policy environment.

For remaining areas without a Priority Broadband Project, BEAM initiated a supplemental competitive process for BEAD eligible providers with nearby networks to close geographic gaps and ensure statewide coverage. The supplemental process consisted of five rounds, receiving 18, 25, 5, 9, and 2 applications, respectively. This phase prioritized communities where earlier rounds had not produced a viable priority broadband application.

Throughout the process, BEAM maintained ongoing communication with applicants through a dedicated email helpdesk, offering clarification and technical assistance as needed. Scoring and eligibility assessments were conducted by BEAM with support from its contracted technical and financial advisors. The review process evolved in tandem with guidance from NTIA and was flexible enough to accommodate the mid-stream changes required by the RPN while still preserving fairness and transparency.

### **Evaluation Procedures**

All applications were reviewed for completeness, eligibility, feasibility, cost reasonableness, and alignment with program goals. Applications were scored using the framework outlined in the Restructuring Policy Notice. The BEAM office elected to first consider technology when competing proposals were within 15% of the cost of each other. If technological factors indicated the competing proposals were comparable, then deployment timelines were considered.

To ensure consistent application of federal priorities, BEAM engaged several third-party engineering firms to perform technical reviews of proposed project technologies. The engineering firms assessed whether each project met the performance, scalability, and longevity standards outlined in the BEAD Restructuring Policy Notice and subsequent Frequently Asked Questions (FAQs). This included a review of:

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- Priority broadband project determination
  - Delivery of 100 mbps download and 20 mbps upload
  - Scalability to 5G and successor technologies
- Tree canopy coverage
- Topographical elevation changes
- Population density to evaluate the appropriateness of technology types.
- Annual rainfall and precipitation levels to assess environmental durability of proposed technologies.

Only those projects that demonstrated the ability to meet or exceed thresholds established by the BEAD program were deemed to be Priority Broadband Projects.

This process allowed BEAM to make award decisions grounded in federal guidance, technology neutrality, technical feasibility, and Mississippi's unique geographic and demographic considerations. The phased structure of the selection process, coupled with technical oversight and iterative communication, ensured prospective subgrants were awarded fairly, transparently, and in alignment with BEAD priorities.

### **1.2 Text Box: Describe the steps that the Eligible Entity took to ensure a fair, open, and competitive process, including processes in place to ensure training, qualifications, and objectiveness of reviewers.**

To ensure a fair, open, and competitive Subgrantee Selection Process, the BEAM Office implemented a rigorous, transparent, and structured process that prioritized objectivity, integrity, and compliance with federal requirements outlined in the Initial Proposal, the BEAD Restructuring Policy Notice, and subsequent NTIA guidance. This comprehensive approach was designed to uphold public trust, mitigate conflicts of interest, and support fair and open broadband deployment across the state.

BEAM began by establishing clear expectations and transparent communication practices during the LOI phase. Prior to opening the LOI portal, BEAM published a detailed LOI Guide on its website, outlining the requirements, timeline, and questions for applicants. To further promote open access to information and understanding, BEAM hosted live webinars to train potential applicants on both the LOI process and the online portal. These webinars were recorded and posted publicly to ensure ongoing access. In addition to publishing all materials on its website, BEAM distributed communications through its established email distribution list and directly to all known broadband providers to ensure comprehensive outreach and encourage participation



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from a wide range of potential subgrantees.

Each LOI was reviewed by outside auditors using standardized assessment categories: completeness, eligibility, financial capacity, and risk, which were based on consistent criteria previously used across other federally funded programs administered by BEAM. This ensured alignment with agency-wide standards while meeting the specific requirements of the BEAD program. The results of the LOI review process, including the list of eligible applicants, were published publicly on BEAM's website to maintain transparency and accountability.

Following the LOI process, BEAM released a full suite of application resources for the initial application round. These included a comprehensive BEAD Application Guide and FAQ document, both of which were made publicly available and regularly updated. To promote widespread access and applicant readiness, BEAM conducted a series of public webinars and office hours well in advance of the application window opening. All updates, including any changes made because of federal policy shifts, were tracked and annotated within the documents revisions table of the Application Guide so that applicants could easily identify modifications.

When the BEAD Restructuring Policy Notice was released mid-way through the Round I application intake window, BEAM, following NTIA guidance, made the decision to close the application window to preserve the integrity and fairness of the process. No Round I applications were reviewed or scored, and no applicants received partial credit, thereby ensuring an even playing field for all future applicants.

Upon release of the BEAD Restructuring Policy Notice, BEAM launched the BoB Round as its updated subgrantee selection process. All applicants were informed of the updated program criteria and scoring rubric through revised guidance documents, email communication, and webinars. To promote competitiveness, BEAM adopted the standardized rubric provided by NTIA and applied it uniformly to all submitted applications. Secondary criteria used for tiebreakers, such as cost-effectiveness within a 15% threshold were communicated in advance of the review process, ensuring applicants were aware of all evaluation components. In alignment with federal expectations, all eligible applicants were provided with a single opportunity to cure deficiencies in their applications. Curing opportunities were clearly communicated via both email and public webinars, and each applicant was given one business day to respond following the submission of a revision request.

BEAM established robust processes to ensure that all reviewers involved in the evaluation of applications were qualified, well-trained, and objective. To support this effort, BEAM used contracted subject matter experts and firms with expertise in

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broadband engineering, mapping, and programmatic compliance. The Project Management Firm conducted technical and financial evaluations across a range of criteria, including general completeness, financial assessments, location template accuracy, speed to deployment, infrastructure and technology assessments, and certification validation. Four engineering firms were tasked with reviewing network designs and conducting assessments on engineering feasibility, scalability, cost reasonableness, and consistency with BEAD guidelines.

To ensure reviewers were both qualified and impartial, each contracted reviewer was required to complete a conflict-of-interest disclosure form for every eligible applicant. These forms were collected and stored in BEAM's secure system of record, and any conflicts were addressed prior to application review. Reviewer assignments were made strategically. Engineers with experience in certain technologies were then assigned accordingly to ensure subject matter experts were involved in the decision-making process. BEAM hosted reviewer coordination calls to align expectations, calibrate review standards, and maintain consistency across the firms.

BEAM also implemented strong internal controls and oversight measures throughout the review process. All evaluations and scoring documentation were recorded in BEAM's system of record. BEAM developed and applied formal business rules, aligned with the Restructuring Policy Notice, to guide final determinations and to eliminate any risk of arbitrary or biased decisions. These business rules, combined with the objective application of the standardized rubric, served as key safeguards against collusion, bias, favoritism, and other actions that could undermine confidence in the process.

The openness of the subgrantee selection process was further reinforced by BEAM's commitment to inclusive communication and wide-reaching engagement. The timeline between the release of public notices and submission deadlines was designed to provide adequate time for applicants to prepare their submissions without creating unreasonable burdens. BEAM's communications strategy included broad distribution through public postings, webinars, direct email outreach, and real-time updates on its website. All updates to program materials and guidance were shared with equal visibility to ensure no applicant had privileged access to information. BEAM also refrained from engaging in provider-specific outreach until after the second full round of applications was submitted and only did so in cases where no viable applications for priority broadband projects were received for specific areas.

Round II of the Subgrantee Selection Process was designed to operate under the same principles, structure, and internal controls as the BoB round. BEAM maintained its commitment to transparency, fairness, and competitiveness by applying the same standardized rubric, reviewer qualifications, conflict of interest protocols, and

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communication strategies. All materials, training, and evaluation procedures mirrored those used in Round I, ensuring consistency and fair treatment for all applicants across rounds.

BEAM's Subgrantee Selection Process was developed and executed in accordance with federal guidance and best practices, ensuring a process that was open to all eligible participants, fair in its treatment of applicants, and competitive in its approach to awarding funds. Through proactive transparency, rigorous conflict of interest controls, consistent scoring methodologies, and wide-reaching applicant support, BEAM demonstrated a strong commitment to program integrity in achieving universal broadband access for all Mississippians.

### **1.3 Text Box: Affirm that, when no application was initially received, the Eligible Entity followed a procedure consistent with the process approved in the Initial Proposal.**

The BEAM Office affirms that it followed the procedure outlined in the Initial Proposal when no viable applications were initially received for PAUs without a priority broadband application. Specifically, after the close of the first round of application solicitations, BEAM identified areas that remained unserved or underserved and promptly initiated a second application window consistent with the plan set forth in the Initial Proposal. This second round reopened the remaining eligible areas for a seven-day period, providing another opportunity for applicants to submit proposals. A webinar was hosted for the eligible applicants to alert them of the process for the Round II application window. The list of PAUs in need of additional applications was sent out to the eligible applicants prior to the application window opening.

Following the conclusion of Round II, a subset of PAUs remained without a priority broadband application. In accordance with the procedures outlined in the Initial Proposal, BEAM initiated supplemental outreach to address these gaps. This phase involved targeted outreach to all BEAD eligible providers with infrastructure in or adjacent to the PAUs that remained unserved or underserved after both application rounds. BEAM conducted five rounds of supplemental outreach to ensure that all remaining eligible areas received adequate attention and consideration, and that the requirement of universal broadband service was reached in a manner consistent with the approved steps as outlined in the Initial Proposal Volume II as revised by the Restructuring Policy Notice.

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- 1.4 Text Box: If applicable, describe the Eligible Entity's methodology for revising its eligible CAI list to conform with Section 4 of the BEAD Restructuring Policy Notice.

In response to the updated statutory definition of Community Anchor Institutions (CAIs) outlined in Section 4 of the BEAD Restructuring Policy Notice, the BEAM Office undertook a comprehensive review of its previously approved CAI list. This process was conducted manually by BEAM staff, who individually evaluated each CAI entry to determine its continued eligibility under the revised federal definition. Through this review, 239 CAIs were removed from eligible for BEAD status.

The review involved cross-referencing each institution against the statutory criteria established by the Infrastructure Investment and Jobs Act (IIJA), ensuring that only those entities that meet the updated definition were retained. Institutions that had been included under broader or state-specific categories approved in the Initial Proposal Volume I, but which no longer aligned with the federal definition, were systematically removed from the list. This meticulous, record-by-record validation process ensures full compliance with NTIA guidance and maintains the integrity of Mississippi's Final Proposal.

- 1.5 Question (YIN): Certify that the Eligible Entity will retain all subgrantee records in accordance with 2 C.F.R. § 200.334 at all times, including retaining subgrantee records for a period of at least 3 years from the date of submission of the subgrant's final expenditure report. This should include all subgrantee network designs, diagrams, project costs, build-out timelines and milestones for project implementation, and capital investment schedules submitted as a part of the application process.

BEAM certifies that our office will retain all subgrantee records in accordance with 2 C.F.R. § 200.334 at all times, including retaining subgrantee records for a period of at least 3 years from the date of submission of the subgrant's final expenditure report. This should include all subgrantee network designs, diagrams, project costs, build-out timelines and milestones for project implementation, and capital investment schedules submitted as a part of the application process.

## **Section 3**

- 3.1 Text Box: Has the Eligible Entity taken measures to: (a) ensure that each subgrantee will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant; (b) ensure that all BEAD subgrant activities are completed at least 120 days prior to the end of the Eligible Entity's period of performance, in accordance with 2 C.F.R. 200.344; and (c) ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by the end of the period of performance for its award, in accordance with 2 C.F.R. 200.344.

BEAM has taken measures to ensure that each customer desiring broadband service will be served within four years after the date on which the subgrantee receives the subgrant. This requirement will be set forth in the subaward agreement between BEAM and the subgrantee under BEAD period of performance requirements and Section 60102(h)(4)(C) of the Infrastructure Act. This will be verified by BEAM by periodic inspections from engineers, and all subgrantees will be required to provide speed test data from its system confirming new customers in the project area are served within four years of the subaward agreement being executed.

BEAM has also taken measures to ensure all subgrant activities are completed within 120 days of its BEAD period of performance end date. BEAM will establish clear subgrant timelines with milestone-based deadlines that align with the overall performance period, incorporating these requirements into subgrant agreements, and conducting regular progress monitoring. BEAM will also provide technical assistance and proactive risk mitigation support to subgrantees, ensuring timely resolution of delays. Additionally, BEAM plans to maintain a buffer period for final reviews and closeout activities to help safeguard compliance with 2 C.F.R. 200.344.

To ensure that all programmatic BEAD grant activities undertaken by BEAM are completed by the end of the period of performance, BEAM plans to reference its comprehensive compliance and monitoring plan that includes deadlines for financial, performance, and closeout reports required under BEAD. BEAM will also assign clear roles and responsibilities across its team and contractors. Lastly, BEAM will regularly coordinate with its NTIA FPO to ensure timely submission of required documentation that further supports successful closeout.

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### Section 4

4.1 Question (YIN): Does the Eligible Entity have a public waste, fraud, and abuse hotline, and a plan to publicize the contact information for this hotline?

Yes, BEAM has a public waste, fraud, and abuse hotline. BEAM intends to publicize the contact information for this hotline.

4.2 Attachment: Upload the following two required documents:

- (1) BEAD program monitoring plan;
- (2) Agency policy documentation which includes the following practices:
  - a. Distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize) or on a basis determined by the terms and conditions of a fixed amount subaward agreement; and
  - b. Timely subgrantee (to Eligible Entity) reporting mandates.

4.3 Question (YIN): Certify that the subgrant agreements will include, at a minimum, the following conditions:

- a. Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;
- b. Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;
- c. Compliance with all relevant obligations in the Eligible Entity's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the Eligible Entity's BEAD award;
- d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;
- e. Subgrantee accountability practices that include the use of clawback provisions between the Eligible Entity and any subgrantee (i.e.,



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- provisions allowing recoupment of funds previously disbursed);
- f. Mandate for subgrantees to publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) and/or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. This includes an  
acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer; and
- g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance is consistently assessed and tracked over time.

BEAM certifies that the subgrantee agreements will include, at a minimum, the following conditions:

- a. Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;
- b. Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;
- c. Compliance with all relevant obligations in the Eligible Entity's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the Eligible Entity's BEAD award;
- d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;
- e. Subgrantee accountability practices that include the use of clawback provisions between the Eligible Entity and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);
- f. Mandate for subgrantees to publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) and/or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. This includes an  
acknowledge of the responsibility to produce copies of materials used

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- for such purposes upon request of the Federal Program Officer; and
- g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance is consistently assessed and tracked over time.

## **Section 5**

- 5.1 Text Box: Describe the public comment period and provide a high-level summary of the comments received by the Eligible Entity during the public comment period, including how the Eligible Entity addressed the comments.

The BEAM Office opened a public comment period by posting the Final Proposal and all required components on its website beginning August 27, 2025, and closing September 3, 2025, to make sure the public and interested stakeholders were aware, BEAM sent out a notice to its full email distribution list, which includes providers, community leaders, and other relevant partners.

Comments were submitted through a dedicated inbox at [msbead@beam.ms.gov](mailto:msbead@beam.ms.gov). This inbox was monitored closely throughout the comment period. BEAM tracked each submission in a centralized spreadsheet to ensure every comment was logged, organized, and ready for review. This approach allowed BEAM to manage feedback efficiently and prepare for a thoughtful and transparent response process.

## **Section 6**

- 6.1 Question (YIN): Certify that the Eligible Entity has successfully completed the BEAD Challenge Process and received approval of the results from NTIA.

BEAM certifies that it successfully completed the BEAD Challenge Process and received approval of the results from NTIA on May 8<sup>th</sup>, 2025.

- 6.2 Text Box: Provide a link to the website where the Eligible Entity has publicly posted the final location classifications (unserved/underserved/CAIs) and



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note the date that it was publicly posted.

Following the approval of the Challenge Process by NTIA and the required public comment period, BEAM publicly posted the final location classifications on their [website](#) on May 14<sup>th</sup>, 2025, for the Initial Application Round. The revised location listing, following the direction of the June 6<sup>th</sup> Revised Policy Notice, was posted on July 3, 2025.

## Section 7

- 7.1 Question (YIN): Certify whether the Eligible Entity will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2).

BEAM will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2).

- 7.2 Text Box: If the Eligible Entity does not serve an unserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.

N/A

- 7.3 Attachment: If applicable to support the Eligible Entity's response to Question 7.2, provide relevant files supporting the Eligible Entity's determination.

N/A

- 7.4 Question (YIN): Certify whether the Eligible Entity will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2).

BEAM certifies that it will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified in the NTIA-

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approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2).

- 7.5 Text Box: If the Eligible Entity does not serve an underserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.

N/A

- 7.6 Attachment: If applicable to support the Eligible Entity's response to Question 7.5, provide relevant files supporting the Eligible Entity's determination. -

N/A

- 7.7 Question (YIN): Certify that the Eligible Entity has utilized the provided reason codes to investigate and account for locations that do not require BEAD funding, that the Eligible Entity will utilize reason codes 1, 2, and 3 for the entire period of performance, and that the Eligible Entity will maintain documentation, following the guidelines provided by NTIA, to justify its determination if there is a reason to not serve any unserved or underserved location on the NTIA-approved final list of eligible locations through a BEAD project. The documentation for each location must be relevant for the specific reason indicated by the Eligible Entity in the fp\_no\_BEAD\_locations.csv file. The Eligible Entity shall provide the documentation for any such location for NTIA review, as requested during Final Proposal review or after the Final Proposal has been approved.

BEAM certifies that it has utilized the provided reason codes to investigate and account for locations that do not require BEAD funding, that it will utilize reason codes 1, 2, and 3 for the entire period of performance, and that BEAM will maintain documentation, following the guidelines provided by NTIA, to justify its determination if there is a reason to not serve any unserved or underserved location on the NTIA-approved final list of eligible locations through a BEAD project.

- 7.8 Question (YIN): Certify that the Eligible Entity has accounted for all enforceable commitments after the submission of its challenge results,

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including state enforceable commitments and federal enforceable commitments that the Eligible Entity was notified of and did not object to, and/or federally-funded awards for which the Eligible Entity has discretion over where they are spent (e.g., regional commission funding or Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects.

BEAM certifies that it has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that BEAM was notified of and did not object to, and/or federally-funded awards for which BEAM has discretion over where they are spent (e.g., regional commission funding or Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects

## **Section 11**

- 11.1 Text Box: Provide the implementation status (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment.

Mississippi is actively implementing the plans described in Initial Proposal Requirement 14 to reduce costs and barriers to broadband deployment. These include: significant progress through legislative, procedural, and operational initiatives.

The Mississippi Broadband Enabling Act, enacted in 2019, authorized rural electric cooperatives to deploy broadband networks using their existing electric infrastructure, enabling cost-effective expansion through affiliated or non-affiliated service providers. While ultimately no cooperative applied for BEAD funding, the broadband subsidiaries of electric coops have actively engaged in infrastructure buildout and participated in other grant funding programs including the CARES Act, RDOF, Reconnect, and CPF.

BEAM grant agreements will include a requirement for a pre-construction meeting to be coordinated by Mississippi 811 which is the statewide utility location clearinghouse, supporting safe excavation practices and minimizing damage pre-existing infrastructure. The Mississippi Underground Facilities Damage Prevention Board complements this effort by promoting industry best practices and educating stakeholders. Additionally, BEAM works closely with the Mississippi Department of Transportation (MDOT) which has streamlined its permitting processes for electric and communications providers by offering a centralized online portal, master agreements for expedited approvals, and localized support through seven district offices. While

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these initiatives reflect substantial progress, full implementation remains in progress as the state continues to refine and expand its strategies to further reduce deployment barriers and accelerate broadband access.

- 11.2 Question (YIN): Affirm that the Eligible Entity required subgrantees to certify compliance with existing federal labor and employment laws.

BEAM Certifies that subgrantees were required to certify compliance with existing federal labor and employment laws.

- 11.3 Text Box: If the Eligible Entity does not affirm that subgrantees were required to certify compliance with federal labor and employment laws, explain why the Eligible Entity was unable to do so.

- 11.4 Question (YIN): Certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.<sup>6</sup>

BEAM Certifies that all subgrantees selected will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.

- 11.5 Text Box: If the Eligible Entity does not certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10- year Federal interest period, explain why the Eligible Entity was unable to do so.

- 11.6 Question (YIN): Certify that all subgrantees have planned for the reliability and resilience of BEAD-funded networks.

BEAM Certifies that all subgrantees have planned for the reliability and resilience of BEAD-funded networks.

- 11.7 Text Box: If the Eligible Entity does not certify that subgrantees have planned for the reliability and resilience of BEAD-funded networks in their network designs, explain why the Eligible Entity was unable to do so.

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### **Section 12**

- 12.1 Text Box:** Describe how the Eligible Entity applied the definition of Priority Project as defined in the Infrastructure Act and the BEAD Restructuring Policy Notice.

To ensure consistent application of this definition, BEAM engaged a third-party engineering firm to conduct technical reviews of all proposed projects.

The firms assessed whether the proposed technology met the performance, scalability, and longevity standards outlined in the BEAD Restructuring Policy Notice. To further support these evaluations, the engineering firm also analyzed environmental and contextual factors such as tree canopy cover, population density, and average annual precipitation to determine the technology's ability to reliably meet the required performance thresholds under varying conditions. Only those projects that demonstrated an ability to meet or exceed these standards were considered compliant with the Priority Project definition.

### **Section 13**

- 13.1 Text Box:** Provide a narrative summary of how the Eligible Entity applied the BEAD Restructuring Policy Notice's scoring criteria to each competitive project application and describe the weight assigned to each Secondary Criteria by the Eligible Entity. Scoring criteria must be applied consistent with the prioritization framework laid out in Section 3.4 of the BEAD Restructuring Policy Notice.

The BEAM Office fully implemented the Scoring Criteria outlined in the Restructuring Policy Notice to guide its evaluation process. Upon receipt of applications, each submission was analyzed at the PAU level. Initial evaluation focused exclusively on net BEAD outlay associated with the proposed deployment. In addition to cost considerations, the BEAM Office assessed the extent of PAU coverage proposed by each applicant. If two or more applications were within 15% cost of each other, they advanced to a secondary review phase. This phase examined the technical specifications of each proposal, expected speeds, and latency performance. If competition remained unresolved after the technology review, applications were further evaluated based on projected completion timelines. This multi-tiered methodology was first applied during the initial BoB round and subsequently used throughout the Targeted PAU Application Round and all Supplemental rounds.

## **Section 14**

### **14.1 Attachment (Required): Submit a document which includes the following:**

Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's National Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.

- Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.
- Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/regional-programmatic-environmental-impact-statements>.
- Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.
- Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

Please see the link to [BEAM's NEPA & NHPA Guide](#)

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### **Section 15**

15.1 Attachment: Upload a Resolution of Consent from each Tribal Government (in PDF format) from which consent was obtained to deploy broadband on its Tribal Land. The Resolution(s) of Consent submitted by the Eligible Entity should include appropriate signatories and relevant context on the planned (f)(1) broadband deployment including the timeframe of the agreement. The Eligible Entity must include the name of the Resolution of Consent PDF in the Deployment Projects CSV file.

N/A

### **Section 16**

16.1 Question (YIN): Does the Eligible Entity certify that it did not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for a BEAD subgrant, consistent with the requirement at 47 U.S.C. § 1702(h)(1)(A)(iii)?

BEAM certifies that it did not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for a BEAD subgrant, consistent with the requirement at 47 U.S.C. § 1702(h)(1)(A)(iii).

### **Section 17**

17.1 Text Box: If any waivers are in process and/or approved as part of the BEAD Initial Proposal or at any point prior to the submission of the Final Proposal, list the applicable requirement(s) addressed by the waiver(s) and date(s) of submission. Changes to conform to the BEAD Restructuring Policy Notice should be excluded. If not applicable to the Eligible Entity, note 'Not applicable.'



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- 17.2 Attachment: If not already submitted to NTIA, and the Eligible Entity needs to request a waiver for a BEAD program requirement, upload a completed Waiver Request Form [here](#). If documentation is already in process or has been approved by NTIA, the Eligible Entity does NOT have to upload waiver documentation again.

BEAM will submit a match waiver request along with the Final Proposal for locations in project areas which face uniquely high deployment costs and limited access to local or private matching funds.

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### **Section 18**

0.1 Attachment (Required): Complete and submit the Subgrantees CSV file (named “fp\_subgrantees.csv”) using the NTIA template provided.

#### **Exhibit A**

0.2 Attachment (Required): Complete and submit the Deployment Projects CSV file (named “fp\_deployment\_projects.csv”) using the NTIA template provided.

#### **Exhibit B**

0.3 Attachment (Required): Complete and submit the Locations CSV file (named “fp\_locations.csv”) using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations .

#### **Exhibit C**

0.4 Attachment (Required): Complete and submit the No BEAD Locations CSV file (named “fp\_no\_BEAD\_locations.csv”) using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.

#### **Exhibit D**

0.5 Question (Y/N): If the Eligible Entity intends to use BEAD funds to serve CAIs, does the Eligible Entity certify that it ensures coverage of broadband service to all unserved and underserved locations, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2)?

Yes

0.6 Attachment (Required – Conditional on a ‘Yes’ Response to Intake Question 0.5): Complete and submit the CAIs CSV file (named “fp\_cai.csv”) using the NTIA template provided. Although CAIs are not included under (f)(1) deployment projects, to confirm the Eligible Entity’s compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTIA template is required. The Eligible Entity must only include CAIs funded via BEAD in this

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list; the Eligible Entity may not propose funding CAIs that were not present on the approved final list from the Eligible Entity's Challenge Process results.

Exhibit E

Exhibit F - Program Monitoring Plan

Exhibit G – EHP Plans

Exhibit H – Subrecipient Agreement

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