

NJ BEAD Final Proposal

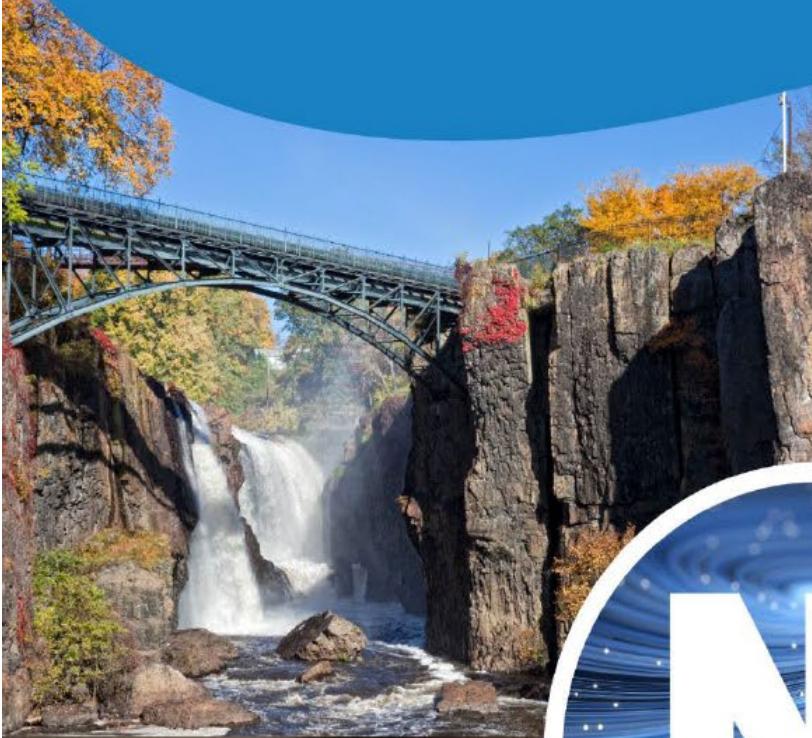


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Final Proposal Data Submission

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

See Attachment A.

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

See Attachment 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.

See Attachment 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.

See Attachment 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 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.

See Attachment E.

Subgrantee Selection Process Outcomes (Requirement 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 (RPN).

See response to Question 12.1 for additional detail.

The New Jersey Office of Broadband Connectivity's (OBC's) Subgrantee Selection Process was designed "around principles of fairness, openness, and competition"¹ while **adhering to Federal BEAD requirements (i.e., Volume II of the Initial Proposal as modified by the BEAD Restructuring Policy Notice (RPN))**. OBC designed the process to ensure 100% coverage of unserved locations and, if funding allowed, to extend service to underserved locations and CAIs, as described in NTIA's BEAD NOFO. OBC's process was conducted in accordance with the NTIA-approved New Jersey Initial Proposal Volume 2 (IPV2), the Infrastructure Investment and Jobs Act (IIJA), the Broadband Equity, Access, and Deployment (BEAD) Notice of Funding Opportunity (NOFO), and was revised pursuant to the BEAD Restructuring Policy Notice issued by NTIA on June 6, 2025.²

OBC's subgrantee selection process started with a pre-qualification process on April 14, 2025. OBC requested pre-qualification applicants to submit initial financial, operational, managerial, and technical qualifications, as well as all required certifications and authorizations. In compliance with the RPN, OBC removed select elements of the prequalification. Additionally, OBC kept the prequalification window open longer, per the RPN, to ensure that all applicants, regardless of technology type, had an additional opportunity to submit prequalification materials. Submissions were reviewed on a rolling basis through July 3, 2025, which is when OBC closed the prequalification window.

Pre-qualified applicants were notified of their status through email. While some applicants were pre-qualified immediately, others completed the review process before achieving pre-qualification. Two applicants chose to discontinue the process, informing OBC of their decision in response to curing emails. **The pre-qualification window lasted 11 weeks.** This process ensured that **providers using all broadband technologies that meet the performance requirements of IIJA, and the NTIA NOFO were eligible to participate in the New Jersey BEAD program**. All applicants who underwent the application review process completed pre-qualification, and no applicants attempted to apply without first being pre-qualified. All pre-qualification materials were reviewed by OBC staff, and no pre-qualification submissions were rejected.

As part of its outreach strategy, **OBC hosted a series of five public engagement sessions to support applicants throughout the BEAD subgrantee selection process**. This included two pre-qualification webinars (April 15 and April 29), two office hours sessions (May 29 and July 15), and a Revised Application Process webinar (June 27) held after the RPN was issued. These sessions covered key requirements, timelines, and application updates, and provided opportunities for live Q&A. OBC also released updated instructions, FAQs, and a video to further assist applicants.

¹ OBC Initial Proposal Volume II

²: NTIA's Restructuring BEAD Policy Notice (June 6th, 2025)

OBG revised its application materials in accordance with the RPN and posted them to OBC's website on June 30, 2025. It simultaneously notified all stakeholders included on OBC's outreach lists that these materials were available for review so that applicants could begin preparing for the application. OBC held one application round (i.e., the Benefit of the Bargain Round). Applicants were allowed to submit multiple applications, as described in IPV2. The instructions were designed to guide applicants in preparing a comprehensive application for evaluation and included guidance on how to submit application materials during the application phase.

Consistent with Section 4 of the RPN, New Jersey invited unlicensed fixed wireless providers to submit evidence that BEAD funding were not required for locations they serve. This period was open for seven (7) calendar days, as required by the RPN, and closed on Tuesday, June 24, 2025. OBC did not receive any responses from Unlicensed Fixed Wireless Providers. As a result, these locations were not removed from the list of eligible locations.

Revised application materials were available to applicants for approximately 3 weeks, beginning on June 30, 2025. During this period, OBC recommended to applicants that they begin working on their applications, but noted that the grant round was not officially open and they could not submit applications. OBC received a letter from NTIA approving its Initial Proposal Correction Letter on July 20, 2025. Accordingly, OBC's grant round opened on this date. Applications were due on July 25, 2025.³

OBG reviewed applications over a two-week period, beginning on July 28, 2025. As required by the RPN (and directly quoted below), OBC made key changes to its approach, including:

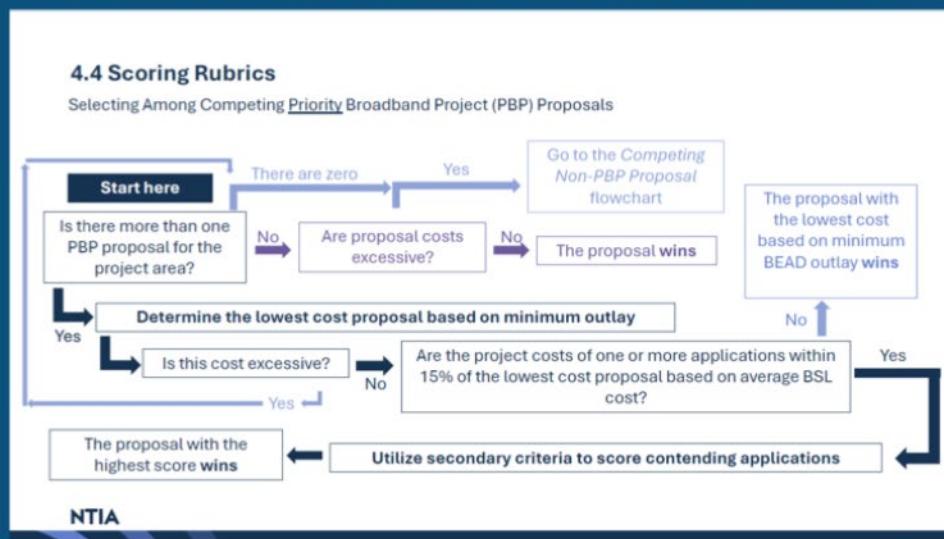
- OBC did not establish an Extremely High Cost Per Location, but per Section 3.1 of the RPN, rejected those Priority Broadband Projects with excessive costs. The term "Priority Broadband Project" was updated to mean "a project that provides broadband service at speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads, has a latency less than or equal to 100 milliseconds, and can easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services."
- Applicants were required to request OBC to treat their "application[s] as a Priority Broadband Project regardless of the technology used." The applicant's project, however, was still required to "meet the required speed and latency standards set forth in the statute and the NOFO and demonstrate that it meets the additional statutory criteria, including that the project can easily scale speeds over time to support evolving connectivity needs and the deployment of 5G and successor wireless technologies."
- Applicants were required to provide "supporting documentation sufficient for ... OBC ... to assess the network application and determine that the proposed network architecture for each specific project area meets this standard." OBC did not "categorically exclude any given technology" and "only reject[ed] treatment of an application as a Priority Broadband Project if the project could

³ Prior to the publication of the RPN, OBC's deadline for submitting its Final Proposal was November 21, 2025. The RPN rescinded the deadline extension previously granted to OBC through the BEAD Programmatic Waiver of the Final Proposal Deadline Requirements (Apr. 22, 2025). The RPN required that the Final Proposal be submitted to NTIA by September 4, 2025. To meet this deadline, OBC compressed both its application and review window.

not meet the statutory definition for a specific project area.” (Section 3.1 of NOFA)

- As described in IPV2 project areas are referred to as “Project Area Building Blocks” (PABBS). Applicants were permitted to propose the exclusion of specific BSLs deemed as “excessively high-cost locations or economically unviable for their proposed technology” within project areas. PABBS could continue to be combined. OBC used the county’s boundary as an individual PABB (Section 3.3 of NOFA).
- As described in IPV2, each full application included expanded financial, operational, managerial, and technical qualifications beyond those required in the pre-qualification phase (e.g., network designs, shapefiles of proposed project area). Applicants were also required to submit deployment timelines, technology plans, and their approach to the Low-Cost Service Option. Information originally required by NTIA, but required to be removed through the RPN (e.g., “Advancing Equitable Workforce Development and Job Quality Objectives” and “Client Resilience”), was not included.
- OBC reviewed applications using the updated scoring rubric defined in the RPN. Accordingly, when comparing priority projects in the same area and non-priority projects in the same area, OBC selected the applicant with the lowest cost on a per BSL basis, except in cases where bids were within 15% of each other. As described in the RPN, all eligible entities are required to further assess applications whose costs are within 15% on a per BSL basis using prescribed secondary criteria. As described in OBC’s NOFA, OBC chose “weigh the speed, latency, and other technical capabilities of the technologies proposed by prospective subgrantees.” (See response to question 13.1 for additional detail).
- NTIA shared scoring rubrics with states during a webinar on June 13, 2025. These rubrics visualized the new scoring requirements described in the RPN and also included in OBC’s updated NOFA. OBC adopted these visualizations (shown below) and presented them to applicants on June 23, 2025 (See response to question 12.1 for additional detail).

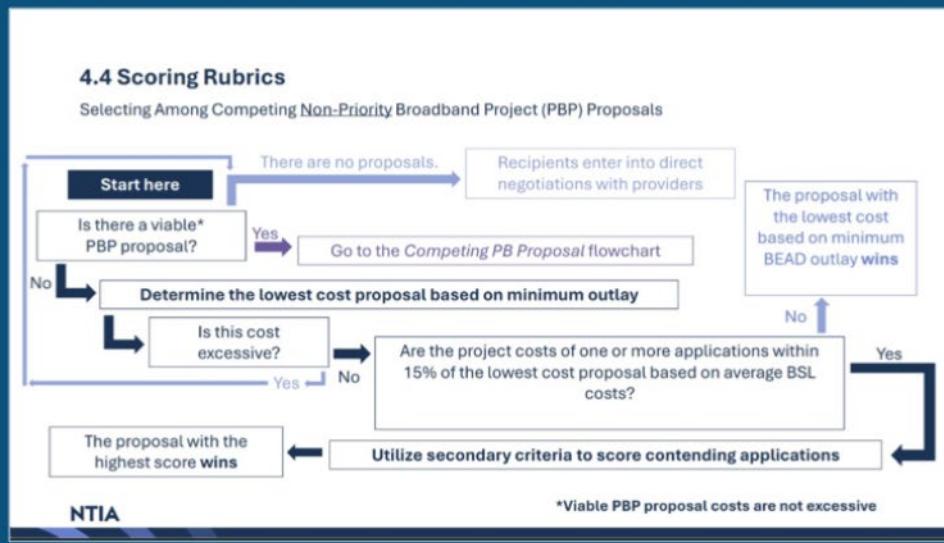
Updated flowchart: Priority Broadband Project Proposals Scoring Rubric



Source: NTIA Webinar for States 06/13/2025

CONNECT 6

Updated flowchart: Non-Priority Broadband Project Proposals Scoring Rubric



Source: NTIA Webinar for States 06/13/2025

CONNECT 7

Approximately 3% of eligible BSls and CAIs, primarily unserved, remained after identifying provisional awardees in each PABB using the RPN scoring rubric (visualized above) and an assessment of applicant capability. OBC then contacted the next lowest-cost priority project that had included locations that

remained unawarded in associated PABBs. OBC requested that the applicant provide a price to serve those locations. If that price was not excessive, OBC awarded the remaining locations to that provider. If that price was excessive, OBC requested the primary provisional awardee to update its application with those locations and price. If the request was not excessive, OBC awarded the remaining locations to that project. If the price was excessive, then OBC requested non-priority projects to provide price quotes, rejecting them only if excessive. After this process, all locations were accounted for in one application.

Consistent with Section 4 of the RPN, New Jersey provided the opportunity for broadband service providers to submit claims and evidence for locations served by their own networks that now show as served in the Version 6 Fabric BDC availability dataset. This period was open for seven (7) calendar days and closed on Tuesday, July 29, 2025. During this period, OBC received a total of 1,170 pieces of evidence from three providers. After review, OBC accepted 960 pieces of evidence as sufficient, and reclassified 873 BSLS and 28 CAIs as served. As required, OBC has identified these under Reason Code 5 (locations already served).

The subgrantee selection process was completed in 21 weeks (4/14 – 9/04), substantially less than the planned six to seven months in New Jersey's IP Volume 2. The Benefit of the Bargain round (excluding prequalification) was completed in less than 6 weeks in order to meet the Sept 4, 2025 deadline.

New Jersey Subgrant Process Timeline	Date
Application instructions released	4/11/2025
Pre-qualification materials released	4/14/2025
Pre-qualification submission window opened	4/14/2025
NTIA published BEAD Restructuring Policy Notice	06/06/2025
OBC submitted Initial Proposal Correction letter to NTIA	06/27/2025
Pre-qualification Window Closed	7/3/2025
Pre-qualification materials review and inform qualified applicants	4/14/2025 - 7/18/2025
Application materials published	7/3/2025
NTIA approves Initial Proposal Correction/ Application window open	7/18/2025
Application window closed	7/25/2025
Application processing and identification of provisional awards	07/28/2025 – 08/08/2025
Finalization of applications with applicants coverage of locations that were excluded from the preliminary awardee for that project area	08/11/2025 – 08/22/2025
Release Final Proposal for required 7-day public comment period	8/25/2025-8/31/2025
Provisional award and Final Proposal draft release for public comment	09/04/2025

OBC conducted a review of applicants' financial, operational, technical, and managerial capabilities in the context of all of their proposals to assess their capability if they were to be awarded some or all of their applications. OBC also reviewed coverage of multiple dwelling units (MDUs) and ensured CAI coverage to the extent funding allowed, which it did. If insufficient funds were available, underserved BSLS and CAIs could have been removed in accordance with BEAD guidance.

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 protect the integrity of the selection process, OBC prioritized implementing a fair, open, and competitive process for selecting subgrantees. This process was conducted in accordance with the NTIA-approved New Jersey Initial Proposal Volume 2 (IPV2), the Infrastructure Investment and Jobs Act (IIJA), the Broadband Equity, Access, and Deployment (BEAD) Notice of Funding Opportunity (NOFO), and was revised pursuant to the BEAD Restructuring Policy Notice issued by NTIA on June 6, 2025 (RPN). The process was designed to safeguard against collusion, bias, conflicts of interest, and arbitrary decision-making during the evaluation phase. By providing timely public notice of the funding opportunity, OBC intended to facilitate a competitive applicant pool. The selection process was based on a clear set of evaluation criteria, which promoted efficiency, transparency, and fairness throughout. The key activities involved were:

Fairness:

OBC aimed to implement a fair and impartial process for selecting subgrantees by establishing clear eligibility requirements and evaluation criteria. The process began with a pre-qualification review to assess whether prospective applicants met minimum qualifications, including operational and managerial capacity. All applicants that submitted a complete prequalification application were approved. Two applicants elected not to continue with the prequalification process. One elected not to proceed because it no longer believed the locations available were a suitable match for its deployment plans.⁴ The other applicant submitted a prequalification application for non-deployment activities.

To promote consistency and minimize bias, applications were reviewed by trained staff with subject matter expertise. To support the integrity of the process, reviewers were required to disclose any potential conflicts of interest. OBC reserved the right to disqualify applicants if their conduct was determined to compromise the integrity of the selection process. These measures were intended to support a process that was structured to be transparent, consistent, and aligned with applicable program requirements.

Openness:

OBC aimed to promote transparency and openness throughout the subgrantee selection process. Outreach efforts were conducted to raise awareness of the grant opportunity through multiple channels, including OBC website, press releases, webinars, and targeted emails to stakeholders and other relevant departments. These efforts were intended to ensure that interested parties had access to key program information. Public announcements included details on evaluation criteria, eligibility requirements, and program objectives to help potential applicants understand the application process.

Public notices were issued in advance of the application window, and applications were accepted beginning on a pre-determined date and time to support a consistent and structured process. In addition, OBC offered technical assistance resources to help applicants understand program requirements and navigate proposal development. To support broad participation, OBC began hosting informational workshops and webinars prior to the pre-qualification period, which were open to all interesting participants.

Competitiveness:

The subgrantee selection process was designed to support meaningful competition and advance the

⁴ Email to OBC staff, July 22, 2025

goal of achieving 100% coverage of unserved locations, and, if funding permitted, underserved locations and Community Anchor Institutions (CAIs). To facilitate this, OBC applied revised, predefined criteria and scoring rubrics (aligned with the RPN). These criteria were intended to be neutral, objective and transparent, allowing applicants to be assessed using a common standard.

Applications were submitted using Project Area Building Blocks (PABBs), which allowed OBC to assess overlapping proposals and compare submissions across providers of varying sizes and capabilities. Had eligible locations not been included in any submitted application, or if the proposed cost to serve was excessive, OBC retained the discretion to address remaining coverage gaps through direct negotiations. This approach was intended to support a competitive environment and promote high-quality broadband service proposals aligned with program objectives.

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.

Not applicable - OBC affirms that all PABBs received an application.

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 alignment with the BEAD Restructuring Policy Notice (RPN) (Section 4), OBC reviewed the list of Community Anchor Institutions (CAIs) to identify any necessary revisions. Of the 495 CAIs published as BEAD-eligible by OBC, only 4 do not fall under the categories of school (S), library (L), health clinic, health center, hospital, or other medical provider (H), public safety entity (F), institution of higher education (S), or public housing organization. After a review, New Jersey removed one, which was the only Government Building and did not fit into one of the above NTIA-approved CAI categories, and another, which may be able to be served through an alternative method.

1.5 Question (Y/N): 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.

Yes.

Timeline for Implementation (Requirement 3)

3.1 Text Box: Has the Eligible Entity taken measures to: (a) ensure that each subgrantees 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.

OCB affirms that it has implemented measures intended to support compliance with the requirement that each BEAD subgrantee begin providing service to each customer desiring broadband within the project area no later than four years after the date on which the subgrantee receives the subgrant, as outlined in the Infrastructure Investment and Jobs Act (IIJA), the Broadband Equity, Access, and Deployment (BEAD) Notice of Funding Opportunity (NOFO), and the BEAD Restructuring Policy Notice (RPN) issued on June 6, 2025. As part of these measures, OBC has ensured that applicants seeking to deploy network facilities were vetted to meet the minimum qualifications for financial and managerial capacity, technical and operational capability, and other requirements outlined in 47 U.S.C. § 1702(g)(2)(A) and the BEAD NOFO.

To support this, OBC will implement a comprehensive risk assessment and monitoring framework to promote timely completion of all project objectives. Each subgrantee will complete a risk assessment questionnaire evaluating key indicators such as their System for Award Management (SAM) record, Federal Awardee Performance and Integrity Information System (FAPIIS) records, management team qualifications, and financial stability. Based on the results, OBC will assign each subgrantee a risk category (low, medium, or high) and tailor monitoring plans accordingly.

These monitoring plans will include progress reports, site visits, invoice reviews, expenditure tracking, and regular communication to assess performance, identify challenges, and provide technical assistance as outlined in the BEAD Program Monitoring Plan. OBC will monitor administrative, financial, and programmatic compliance for each subgrant throughout the lifecycle of the award. Monitoring plans will incorporate milestone-based timelines and checkpoints to track progress, flag implementation risks, and apply corrective actions when necessary. OBC will adjust its monitoring plan in accordance with forthcoming NTIA guidance.

OCB further affirms that all BEAD subgrant-funded activities will be completed no fewer than 120 days before the end of New Jersey's period of performance, in accordance with 2 C.F.R. § 200.344.

Additionally, OBC will ensure that all programmatic BEAD grant activities undertaken by the state are concluded by the end of its BEAD award period of performance, also in compliance with 2 C.F.R. § 200.344.

To achieve this OBC will implement milestone-driven project management framework embedded in both the New Jersey BEAD Subgrant Agreement (Attachment G) and the BEAD Monitoring Plan (Attachment F). Specifically:

- **Milestone-Based Subgrant Agreements:** As outlined in Attachment G, all subgrantees must adhere to an approved Scope of Work with defined milestones. Payments are made only on a reimbursement basis and only after OBC verifies successful milestone completion, ensuring that progress is continuously documented and that delays are immediately visible.
- **Structured Monitoring and Verification:** Attachment F establishes OBC's monitoring framework,

under which subgrantees are required to submit quarterly reports and supporting documentation tied to milestones. OBC verifies performance through desk reviews, site inspections, and financial documentation before approving reimbursement.

- **Progress Benchmarks and Corrective Action:** Milestones are structured to include interim benchmarks (e.g., 25%, 50%, 75% project completion) so that subgrantees remain on track to finish with at least a 120-day buffer. If a subgrantee falls behind, OBC initiates a Performance Improvement Plan under the Monitoring Plan to enforce corrective actions, up to and including withholding or reallocation of funds.
- **Closeout Alignment:** Both Attachment G and Attachment F require that final deliverables, financial reconciliations, and reporting be completed before closeout. By mandating that subgrantee projects end 120 days prior to the federal deadline, OBC preserves sufficient time for final verification and compliance reviews.

To reinforce these safeguards, and with the understanding that some scenarios may require flexibility while still maintaining accountability, OBC may employ a mix of fixed amount subawards (FSAs) and cost reimbursement subawards, consistent with the BEAD framework and 2 C.F.R. Part 200. OBC's monitoring plans account for the distinct requirements of each award type while applying consistent accountability standards. Both FSAs and cost reimbursement agreements will remain subject to appropriate oversight and controls, including aligning monitoring intensity with award structure, maintaining clear documentation requirements, and applying milestone-based reviews across all subgrants to confirm progress toward deployment objectives.

Oversight and Accountability Processes (Requirement 4)

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

Yes.

4.2 Attachments: 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.

(1) See Attachment F – BEAD Program Monitoring Plan

(2) See Attachment G – Draft Subgrant Agreement

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

- a. Compliance with Section VII.E of the BEAD NOFO, 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 acknowledgment 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.**

Yes.

Local Coordination (Requirement 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.

OCBC certifies that New Jersey has adhered to the Final Proposal public comment requirements as described in NTIA's BEAD Final Proposal Guidance. New Jersey's 7-day public comment period was held from August 27 to September 2, and provided both the general public and political subdivisions with an

opportunity to submit comments. During this period, OBC received input from six organizations. Feedback addressed topics such as eligible BEAD locations, BEAD Non-Deployment, Subgrant Agreement provisions, and the timeline of the public comment period. All responses were reviewed and documented by OBC. All comments were about non-deployment or did not include the specificity needed to enable BPU to assess whether modifications to the proposal would be appropriate.

Challenge Process Results (Requirement 6)

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

Yes.

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 note the date that it was publicly posted.

New Jersey's list of eligible Broadband Serviceable Locations (BSLs) was initially finalized in May 2025, incorporating NTIA-approved post-challenge results, updates from FCC Fabric Version 6, and enforceable commitments (including the New Jersey Broadband Infrastructure Deployment Equity (NJBIDE) Pilot Program). Pursuant to NTIA's BEAD Restructuring Policy Notice (RPN), OBC reviewed and made modifications to its Community Anchor Institutions (CAIs) list in June 2025.

OBG notified all providers with locations that were recategorized from "underserved" or "unserved" in Fabric v4 to "served" in Fabric v6 that OBC would review evidence, and if the evidence was sufficient, remove those locations from any potential NJ BEAD award.

[New Jersey's Post Challenge Location file](#)

[New Jersey's BEAD Eligible Locations Map](#) (Last updated: June 26, 2025)

[New Jersey's Post Challenge CAI file](#) (Last updated: June 26, 2025)

Unserved and Underserved Locations (Requirement 7)

7.1 Question (Y/N): 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).

Yes.

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.

Not Applicable.

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

Not Applicable.

Coverage of Underserved Locations

7.4 Question (Y/N): 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).

Yes.

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.

Not Applicable.

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

Not Applicable.

7.7 Question (Y/N): 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 Challenge Process list 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.

Yes.

7.8 Question (Y/N): Certify that the Eligible Entity has accounted for all enforceable commitments after the submission of its challenge results, 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.

Yes.

Implementation Status of Plans for Cost and Barrier Reduction, Compliance with Labor Laws, Low-Cost Plans, and Network Reliability and Resilience (Requirement 11)

11.1 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.

The State of New Jersey is committed to deploying broadband infrastructure in a cost-effective and efficient manner, particularly to unserved and underserved areas. The New Jersey Office of Broadband Connectivity (OBC), housed within the Board of Public Utilities (BPU), outlined implementation plans in its approved Initial Proposal Requirement 14 to reduce deployment costs and barriers. These plans are currently **In Progress** and include coordinating with state agencies, promoting the use of existing infrastructure, exploring coordinated digging policies, streamlining permitting processes, and facilitating cost-effective access to essential resources such as poles, conduits, and easements. These initiatives are being actively advanced through ongoing interagency collaboration and stakeholder engagement. The following summaries reflect the status of those efforts as updated per the BEAD Restructuring Policy Notice issued on June 6, 2025.

Promoting the use of existing infrastructure: In Progress

OBG recognizes the importance of leveraging existing infrastructure, including poles and conduit, to expedite broadband deployment. OBC is maintaining close coordination with the New Jersey Department of State and an interagency planning working group to ensure alignment across state entities. This group includes New Jersey Department of Transportation (NJDOT), New Jersey Economic Development Authority (NJEDA), New Jersey Transit Corporation (NJ Transit), New Jersey Department of Environmental Protection (NJ DEP), and others. OBC has also designed subgrantee scoring criteria to incentivize use of existing infrastructure by prioritizing speed and cost efficiency in deployment proposals.

Promoting and adopting coordinated digging and dig-once policies: In Progress

While New Jersey does not have a formal statewide Dig Once policy, OBC is exploring the development of coordinated digging approaches with NJDOT and other agencies. The State's "One Call Law" (Underground Facility Protection Act) supports coordination and risk mitigation in excavation projects. OBC and NJDOT intend to use these existing tools and explore further coordination mechanisms during BEAD implementation.

Streamlining permitting processes: In Progress

OBG has identified key permitting streamlining goals and will elevate these to the Department of State's interagency working group. These include publishing a comprehensive permitting guide, expanding e-permitting systems, and coordinating with the NJ State Planning Commission's redevelopment plan update. OBC also requires subgrantees to prepare for permitting timelines in their project plans and continues to provide technical assistance on permitting requirements and compliance timelines.

Streamlining cost-effective access to poles, conduits, and easements: In Progress

OBG is engaging with the interagency working group and League of Municipalities to facilitate cost-effective access to key infrastructure elements. While BPU lacks regulatory authority over municipal pole access, it is pursuing stakeholder coordination and sharing best practices through technical assistance sessions. OBC also encourages resource-sharing agreements and joint purchasing coalitions to reduce material costs for providers.

Streamlining rights of way, including the imposition of reasonable access requirements: In Progress

OBG is partnering with NJDOT to streamline access to state rights-of-way, including compliance with FHWA's Broadband Infrastructure Deployment rule (§ 645.307(a)). OBC is also reviewing public comments related to right-of-way access fees and continues engagement with local governments and the League of Municipalities to identify best practices. Legislative or regulatory adjustments may be considered to further improve right-of-way access efficiency.

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

Yes.

11.3 Text Box (Optional – Conditional on a 'No' Response to Intake Question 11.2) 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.

Not Applicable

11.4 Question (Y/N): 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.

Yes.

11.5 Text Box (Optional – Conditional on a 'No' Response to Intake Question 11.4) 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.

Not Applicable.

11.6 Question (Y/N): Certify that all subgrantees have planned for the reliability and resilience of

BEAD-funded networks.

Yes.

11.7 Text Box (Optional – Conditional on a ‘No’ Response to Intake Question 11.6): 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.

Not Applicable.

Substantiation of Priority Broadband Projects (Requirement 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.

In accordance with the Infrastructure Act (IIJA) and NTIA’s BEAD Restructuring Policy Notice (RPN), OBC applied the updated definition of a Priority Broadband Project as defined below:

“A project that provides broadband service at speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads, has a latency less than or equal to 100 milliseconds, and can easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services.”⁵

OBC incorporated this definition into its application materials, scoring rubric, and technical review protocols to ensure consistent evaluation of whether a proposal met the Priority Broadband Project standard.

As further stated in the RPN:

“Any applicant may seek to have the Eligible Entity treat its application as a Priority Broadband Project regardless of the technology used. The applicant’s project, however, must still meet the required speed and latency standards set forth in the statute and the NOFO and demonstrate that it meets the additional statutory criteria, including that the project can easily scale speeds over time to support evolving connectivity needs and the deployment of 5G and successor wireless technologies. Applicants must provide supporting documentation sufficient for the Eligible Entity to assess the network application and determine that the proposed network architecture for each specific project area meets this standard.”

And

⁵ [NTIA BEAD Restructuring Policy Notice](#), page 9

“Eligible Entities may not categorically exclude any given technology and may only reject treatment of an application as a Priority Broadband Project if the project could not meet the statutory definition for a specific project area.”

OBG incorporated multiple factors into its review of individual Priority Broadband Project (PBP) requests, including network designs and diagrams and project area geography features, including density, tree canopy coverage, slope, and precipitation. In addition, OBC reviewed the technical capabilities asserted for specific project areas and additional information provided by applicants. For the former, OBC reviewed whether information was provided and if it was tailored to each specific project area rather than applied for the entire state. For the latter, OBC reviewed the specific additional information provided. For example, LEO applications excluded all multiple dwelling units with a unit count greater than 4 without explanation. All of this information was assessed holistically to determine whether the project demonstrated it could easily scale speeds over time to support evolving connectivity needs and the deployment of 5G and successor wireless technologies. The approach emphasized local-level review, taking into account how these factors interact in shaping the feasibility and scalability of broadband deployment.

As part of this analysis, OBC examined the average percent of tree canopy coverage using 30-meter resolution data from the 2021 National Land Cover Database (NLCD). Locations with 50% or more coverage indicated severe attenuation. Rainfall was assessed using the NOAA Precipitation Frequency Data Service GIS page. Locations with regular 3+ in/hr events / some > 4 in/hr events indicated potentially frequent packet loss latency > 200 ms. Given the relative density of New Jersey (e.g., the most densely populated state in the United States with a statewide average in 2024 of 1,291.89 persons per square mile), OBC approached the density using two methods. It reviewed density by census block, using data from the 2020 US Census, and it reviewed clusters of BSLs within 500 meters of each other, examining between 8 and >14 BSL/sq mi within the census block or cluster. Neither tree canopy coverage, precipitation, or density were by themselves determinative. Rather, OBC reviewed these together, alongside the evidence of technical capabilities provided by each applicant.

Subgrantee Selection Certification (Requirement 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.

See responses to Questions 1.1 and 12.1 for additional information.

OBG evaluated subgrantee applications according to the prioritization framework in Section 3.4 of the BEAD June 6th Restructuring Policy Notice. Below is a detailed description of New Jersey's scoring rubric:

Primary Criteria – In alignment with NTIA's Restructuring Policy Notice (RPN), New Jersey prioritized selecting project proposals in the same area based on the lowest cost to the BEAD Program.

Minimization of BEAD Program Outlay: The state assessed both the total BEAD funding required to complete each project (i.e., the total cost minus the applicant's match) and the cost per location served (i.e., BEAD funding divided by the number of BSls served).

Secondary Criteria – When multiple applications proposed to serve the same general project area and fell within 15% of the lowest-cost proposal on a per-BSL basis, New Jersey evaluated the following:

Speed of Network and Other Technical Capabilities (75 points): Applications were evaluated on certified speed, latency performance commitments, infrastructure longevity, and future scalability. A maximum of 75 points was awarded in this category.

Speed of Deployment (25 points): Points were awarded based on the subgrantee's binding commitment to provide service by a date earlier than four years after receipt of the subgrant, subject to contractual penalties. Greater weight was given to those committing to earlier deployment.

Environmental and Historic Preservation (EHP) Documentation (Requirement 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 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.**

See Attachment H.

Consent from Tribal Entities (Requirement 15)

15.1 Attachment(s) (Required if any deployment project is on Tribal Lands): 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.

Not Applicable.

Prohibition on Excluding Provider Types (Requirement 16)

16.1 Question (Y/N): 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)?

The OBC certifies that New Jersey 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).

Waivers

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.'

Not Applicable.

17.2 Attachment (Optional): 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.

Not Applicable.