

**Broadband, Equity, Access, and Deployment (BEAD) Program
Benefit of the Bargain (B.O.B.) Solicitation Round**

No. 2026-MBI-03

Questions and Answers
July 18, 2025

| | Question | Answer |
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| 1 | Were Round 1 applicants notified if they were a Preliminary Grantee in Round 1? Will MBI be notifying applicants about their status as a Preliminary Grantee? | No. MBI's review of Round 1 BEAD applications earlier this year did not result in notification to applicants. MBI will not be publishing the list of applicants that MBI has identified as preliminary subgrantees. |
| 2 | If a Round 1 Applicant wants to stand on its existing BEAD application, is it required or allowed to submit other information such as scalability? | <p>No. An applicant to the BEAD B.O.B. round that submitted an application under Round 1 has two options:</p> <p><u>Option 1</u> - Stand on the existing Round 1 application. In this instance, the Applicant is not allowed to submit additional or new information or documentation. Potential applicants should carefully read Section 4.6.1 of the Solicitation to inform the applicant's determination on whether to stand on an existing application or submit a new application. Potential applicants standing on a Round 1 application must ensure that the existing budget for each PSA is still accurate: (1) for each corresponding PSA in the BEAD B.O.B. round (which may have changes in the broadband serviceable locations and/or the community anchor institutions); and (2) does not include any costs to comply with BEAD Program subgrantee requirements and obligations, including reporting and compliance requirements, that were eliminated by NTIA in the BEAD Restructuring Policy Notice. Potential applicants should also determine if their existing application contains sufficient information to support their proposed project status as either a Priority Broadband Project or a Non-Priority Broadband Project.</p> <p><u>Option 2</u> - complete and submit a new application. If the applicant elects to submit a new application, the applicant must submit a new full application and can include information</p> |

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| | | that directly addresses issues such as the scalability requirement for Priority Broadband Projects. |
| 3 | Is a Round 1 Applicant able to “recycle” its existing BEAD application to keep most of the responses and make minimal changes? | No. Please refer to the answer to Question #2. |
| 4 | Do we need to still have some sort of schematic plan submitted as part of the application? | Yes, there is still a requirement in Section 5.3.2 of the Solicitation to submit a high-level network design that includes geospatial data and associated narrative(s). There are also additional narrative requirements in Section 5.3.5 for projects utilizing fixed wireless and low earth orbit (LEO) satellite technologies and in Section 5.3.6 for Priority Broadband Projects. |
| 5 | What is a Priority Broadband Project? | The term “Priority Broadband Project” means 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 should also review Sections 5.3.2 and 5.3.6 of the Solicitation for more information on Priority Broadband Projects. |
| 6 | Can we still propose a fiber build out? | Yes. |
| 7 | Can we include incidental overbuild costs? | The Applicant must demonstrate that the proposed overbuild portions of the Project are the most cost-effective and necessary approach to reaching unserved or underserved BSLs. Incidental overbuild costs cannot exceed 15% of the total Project cost. Please refer to Sections 3.2 and 4.2 of the Solicitation for additional information. |
| 8 | Is there a threshold on incidental overbuild regarding number of fiber miles? | No, overbuild is not measured in miles of infrastructure. Given the likely variability of proposed projects, MBI has established a 15% maximum of the total Project cost for incidental overbuild. Please refer to Section 3.2 and 4.2 of the Solicitation for more information. |
| 9 | Does the provider still need to secure a letter of agreement from the town’s selectboard? | No. Due to the compressed timeframe for Massachusetts to submit a BEAD Final Proposal to NTIA by September 4, the Solicitation does not |

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| | | include a requirement to submit a municipal letter of support. |
| 10 | How is MBI defining what an overbuild is? | Section 3.2 of the Solicitation defines Overbuild as “the construction of broadband infrastructure that passes or otherwise makes broadband service available to location(s) that are not Unserved or Underserved.” |
| 11 | Is an Applicant allowed to absorb project costs exceeding 15% of total project budget for incidental overbuild? Can this be included as part of the match? | No. Any expenses for the overbuild portions of the proposed network that are determined by MBI to be allowable as incidental overbuild costs are capped at 15% of the total Project cost. All other overbuild costs are the sole responsibility of the applicant and may not be included in the Project budget and therefore may not be applied by the applicant to satisfy any portion of the match requirement. |
| 12 | How do you treat PSAs where the Applicant selects a portion of BSLs that have a higher cost associated with them? | <p>NTIA’s BEAD Restructuring Policy Notice allows an applicant to exclude from a Project Service Area any broadband serviceable locations that the applicant determines are excessively high-cost locations. The Policy Notice does establish a quantitative threshold for excessive cost. The Policy Notice also indicates that states should not fund projects that would incur excessive costs. MBI will make determinations of whether a project would incur excessive costs as required by and consistent with the goals and objectives of the Policy Notice. MBI will look at the total amount of the outlay of BEAD funds required for a Project Service Area as well as the cost on per location basis.</p> <p>Please note that as stated in Section 4.5 of the Solicitation, MBI reserves the right to determine at its sole discretion whether the proposed exclusion of BSL(s) from a PSA would materially alter the composition of the PSA and may therefore be rejected by MBI.</p> |
| 13 | Is this grant inclusive of the \$147 million announced for BEAD? | Yes. Massachusetts has not made any subgrant awards for the BEAD Program and is required by NTIA to conduct a Benefit of the Bargain round as part of the subgrantee selection process. |
| 14 | What are eligible locations to serve? Should I consult the FCC National Broadband Map? | Applicants should only refer to the Proposed BEAD BSL List posted on the BEAD B.O.B. solicitation webpage for the complete list of |

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| | | eligible broadband serviceable locations. This list contains location IDs that tie to the FCC BSL Fabric. |
| 15 | Are CAIs also included in the solicitation? | <p>Applicants may submit applications to serve community anchor institutions (CAIs) in any Project Service Area where the applicant is applying to serve broadband serviceable locations. Applicants will complete and submit the Proposed BEAD CAI List. Applicants will be required to submit a separate budget for each CAI that the applicant proposes to serve. There is also a separate section of the Application for CAIs in the online Submittable BEAD B.O.B. Application. Please note that NTIA has issued a new definition for a community support organization in Version 12 of the BEAD Program FAQs (refer to Section 2.27) that was published on July 15. MBI has not made any determinations as to which CAIs satisfy the new definition for a community support organization.</p> <p>Please note that in Section 4.5 of the Solicitation, it states that the inclusion of CAIs is not mandatory and there is no minimum threshold for the number of CAIs that an applicant must include in a proposed Project Service Area. Section 4.5 further states that MBI reserves the right to determine the extent to which CAIs will be funded through this solicitation after all remaining unserved and underserved BSLs have been awarded.</p> |
| 16 | The BSL list has slightly changed since Round 1. If changes are in a town where my application has been filed, am I able to stand on a previously filed application? | Please refer to the answer to Question #2. |
| 17 | The CAI list has slightly changed since Round 1. If changes are in a town where my application has been filed, am I able to stand on a previously filed application? | Please refer to the answer to Question #2. |
| 18 | If an Applicant decides to stand on their existing application, how will MBI treat components of the application that are no longer aligned to the BEAD Program, per the NTIA Policy Notice (e.g., if Applicant had originally proposed a middle-service tier)? Would the Applicant still be held to their | Any elements of the BEAD Program that were eliminated by the NTIA BEAD Restructuring Policy Notice that were included in an existing Round 1 application will not be considered by MBI as part of the threshold review and scoring process for the BEAD B.O.B. round if an applicant elects to stand on its existing Round 1 application. |

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| | response, or would those items not be considered? | |
| 19 | As long as the applicant can stay within the original budget, even if the BSLs within that budget have changed, is there an opportunity to stand on previously submitted application? | Please refer to the answer to Question #2. |
| 20 | Do we still need to complete the Project Financial Workbook? | Yes, the Project Financial Workbook is still a required component of the BEAD B.O.B. application. The link to the Project Financial Workbook has been posted by MBI on the BEAD B.O.B. solicitation webpage . |
| 21 | In the scoring, will MBI consider the fact that fiber is future proofed much more than some of the other permissible alternative technologies? How will MBI view cost as a component of scoring between fiber and LEO? | <p>The BEAD Restructuring Policy Notice issued by NTIA has eliminated the preference for fiber and has adopted a technology-neutral approach. All technologies listed in the definition of “Reliable Broadband Service” in Section 3.2 of the Solicitation are eligible for BEAD funding as a Priority Broadband Project if the proposed network satisfies the performance and technical requirements in the BEAD B.O.B. solicitation. Priority Broadband Projects will receive preference over Non-Priority Broadband Projects when there are competing proposals for the same Project Service Area.</p> <p>Please refer to Section 6.3 of the Solicitation for more details on the Scoring Rubric, including descriptions of Primary and Secondary Scoring Criteria.</p> |
| 22 | Is there a limit as to how much funding an applicant may receive? | No, there is no cap on the cumulative amount of BEAD funding that an individual Applicant can be awarded under the BEAD B.O.B. solicitation. |
| 23 | Who should submit the application: the municipality or the ISP? | Applications should be submitted by the entity that will be responsible for undertaking the project, executing the BEAD grant agreement, and complying with all BEAD Program requirements. Please refer to Section 4.1 of the Solicitation for the list of entities that are eligible to apply for BEAD funding. |
| 24 | Can applicants remove BSLs in a PSA if they are at risk of being determined as an excessive high-cost? | Yes. Please refer to the answer to Question # 12. |
| 25 | What is the definition of Community Anchor Institution (CAI) that MBI is adhering to for the BEAD B.O.B.? | The general definition of Community Anchor Institution (CAI) is in Section 3.2 of the Solicitation, which complies with NTIA’s BEAD |

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| | | Restructuring Policy Notice. MBI will also comply with all other guidance issued by NTIA regarding CAIs, including the clarification on community support organizations in Version 12 of the BEAD Program FAQs (refer to Section 2.27) published by NTIA on July 15. |
| 26 | Can a Performance Security letter from Round 1 be used in the BOB Round? | Yes, a Performance Security letter from Round 1 can be used in the BEAD B.O.B. round provided that (1) it is still valid from the issuing entity; and (2) the dollar amount referenced is not less than the cumulative subaward total amount across all proposed Projects |
| 27 | While putting up fiber, could the fiber be passed over to areas outside of the underserved areas since it's being stringed up. | Please refer to the answers related to overbuilds in Questions #7, 8, 10 and 11. |
| 28 | Is it possible to pull up a Round 1 application and make necessary changes? | No. Please refer to the answer to Question #2. |