

Solicitation No. 2024-MBI-01 for Broadband Infrastructure Gap Networks Grant Program- Questions and Answers Batch #3

#	Question	MBI Response
1.	Is the applicant required to build to every unserved address though some within the massbroadband.map show no physical structures?	Applicants are required to build to all unserved and underserved broadband serviceable locations (BSLs) in each municipality within a proposed Project Service Area. MBI encourages all applicants to do their due diligence in identifying unserved and underserved BSLs.
2.	Within massbroadband.map the unserved data in the “Broadband & Digital Equity Indicators” section show a higher number of unserved versus the number of red dots within the map – how does an applicant determine the correct number of unserved within any municipality?	Within the Massachusetts Broadband Map the number of unserved and underserved locations in the broadband and digital equity indicator section should match the number of red and orange dots for the selected area on the map. Make sure that the boundaries drop down menu is set for the correct geography. In the event that there is a discrepancy, applicant should do their own due diligence to identifying unserved and underserved BSLs, including referring to the FCC Broadband Map.
3.	If applicant is submitting multiple PSAs, the municipalities within each PSA do not have to be contiguous to other PSAs, correct?	Proposed Project Service Areas (PSAs) do not need to be contiguous to one another. However, only municipalities that are contiguous can be included within a single PSA.
4.	Will MBI provide a map of proposed PSAs, or will PSAs be defined by program applicants to propose? Will PSAs be defined by municipal boundaries, census tracts, and/or BSLs? Will proposing a PSA that includes BSLs in a municipality by extension require a program applicant to include all unserved and underserved BSLs within that municipality for the purposes of the program application, and would the answer vary regarding whether a program applicant is a municipal entity or a non-municipal entity? (<i>Section 4.4.1. Eligible Locations</i>)	Project Service Areas (PSAs) are defined by the applicant. PSAs should be defined by municipal boundaries. Applicants must include all unserved and underserved broadband serviceable locations (BSLs) within each municipality that is included in a proposed PSA. This requirement is the same for municipal and non-municipal applicants.
5.	It is noted that “The grant application must include a letter of support from the governing body of each municipality that will be served by the proposed project.” It will not be feasible for program applicants to request official letters of support from	A written letter of support from the municipality’s governing body is a mandatory requirement for each municipality that is included in a

	municipal governing bodies, as during the holiday season public meetings are typically canceled or abbreviated. What formal action and/or resolution (if any) is required for the letter of support to be considered as being from the governing body of each municipality? Is this letter of support only required if the PSA covers more than one municipality? (Section 4.4.1. Eligible Locations)	proposed Project Service Area (PSA). If a written letter cannot be secured before the Round 1 deadline of December 11, 2023, then Applicants are encouraged to submit those PSA(s) as part of a Round 2 application.
6.	Are there datasets available for download in CSV and GDB format of BSLs that are considered by MBI (not the FCC) to be unserved and underserved, in two distinct datasets? Currently, the BSLs available for download appear to be a collective dataset that does not distinguish between served, underserved, and unserved locations.1 (Section 4.4.3. Overbuild)	No.
7.	Does MBI use solely ISP advertised speeds (also known as “marketing speeds”) versus actual (experienced) speeds at the premises and other performance metrics such as reliability and operational availability (such as the prevalence of intermittent slowdowns and network outages) to define whether a BSL is served or underserved/unserved? (Section 4.4.3. Overbuild)	MBI, as well as the FCC, use the ISPs advertised speeds. Issues related to quality of service may be addressed through the Challenge Process for the BEAD Program that will be administered by MBI in 2024.
8.	Is the intended text “Applicants may request funding to cover the cost of a “non-standard” customer installation that normally requires the customer to contribute to the upfront, non-recurring cost of the installation.”? Otherwise, the wording as originally stated implies that the customer could be potentially liable for the full or partial amount of the installation NRC. (Section 4.4.4. Long Drop, Non-Standard Customer Installations)	The interpretation of the language in Section 4.4.4 of the grant solicitation is essentially accurate. The applicant may apply for grant funding for the portion of the cost of a non-standard installation that would be covered by the customer. There is a \$10,000 cap per non-standard installation and this is only available for customers that reside in unserved or underserved broadband serviceable locations (BSLs) that are within a proposed Project Service Area (PSA).
9.	Will the grantee invoice submissions be “high level” (rolled up dollar figures) or shall the invoice submissions include all corresponding invoices from vendors and service contracts, which tally up to the submitted invoice amount on a line-by-line basis? Will invoice submissions be treated as confidential (vendor and service contract pricing information) or will these documents become subject to public disclosure? (Section 5.3. Funding Match Verification)	Please refer to Section 3(a)(v) of Exhibit 2, Statement of Work, in the Gap Networks Federally Funded Grant Agreement Template for a detailed description of how invoices and their supporting documentation are to be prepared. All documentation is subject to public disclosure unless a statutory exemption applies as determined by MassTech’s General Counsel.
10.	Will it be established that grantees are expected to invoice at the exact billing amount assessed by their vendors and service contracts, or will an invoice “pass through fee” be allowable? (Section 5.3. Funding Match Verification)	Please refer to the grant agreement template, Exhibit 2 section 3. V. which refers to documentation to be submitted with invoices. It is expected that vendor and service contracts will be invoiced at the actual

		<p>costs charged, without a pass through fee.</p> <p>The applicant can submit for reimbursement of personnel costs for staff required for carrying out the project and costs associated with monitoring and reporting requirements.</p>
11.	<p>What terms will be in place for reimbursement of approved invoice submissions? In other words, what is the expected duration between invoice submission, the release of the reimbursable funds by MBI to the grantee, and the receipt of funds by the grantee? Typically, industry vendors and service contracts are payable "net 30." (Section 5.3. Funding Match Verification)</p>	<p>As stated in the grant agreement template: MassTech shall pay funds to Participant within forty-five (45) days of a complete request for payment (or within fifteen (15) days of MassTech's receipt of payment from the Executive Office of Economic Development, if later).</p>
12.	<p>We fully understand that there is detailed process to request submitted materials for the purposes of applying to this grant program be treated as confidential before submitting, otherwise all submissions "shall become MBI's property and shall be subject to public disclosure." However, it is not clear once the grant program is implemented how submitted documentation such as quarterly status reports (and ongoing invoice submission documents) will be handled. Will these documents be posted to MBI's website by default? (Section 7.2. Submission)</p>	<p>It is not MassTech's current practice to post such documents on its website.</p>
13.	<p>Have the slides and the meeting recording from the November 17th "Technical Assistance Webinar" been posted to MBI's website?</p>	<p>Yes.</p>
14.	<p>Will all of the submitted questions regarding the Broadband Infrastructure Gap Networks Grant Program be posted to MBI's website?</p>	<p>Yes.</p>
15.	<p>Will MBI take into consideration the November 14th to November 17th delay of the "Technical Assistance Webinar," as well as the delay to the deadline for program questions (November 17th to November 22nd), and extend the December 11th application deadline to January 2024?</p>	<p>The submission deadline will not be changed for Round 1. All Round 1 applications must be submitted by 5:00PM on December 11, 2023. MBI will administer a Round 2 of the Gap Networks Grant Program.</p>
16.	<p>The Treasury Department has stated that Build America, Buy America Act ("BABA") does not apply to broadband infrastructure projects using funds from the Coronavirus State and Local Fiscal Recovery Funds ("SLFRF") program authorized by the American Rescue Plan Act. See Treasury SLFRF FAQ at 44, Question 6.18 ("Awards made under the SLFRF program are not subject to the Buy America Preference requirements set forth in section 70914 of the Build America, Buy America Act included in the Infrastructure Investment and Jobs Act, Pub. L. 117-58."), https://home.treasury.gov/system/files/136/SLFRF-Final-Rule-FAQ.pdf. The Capital Projects Fund was also created by the American Rescue Plan Act. Can MBI confirm that BABA does not</p>	<p>Please refer to Section 10.2.5 of the grant solicitation for information on the applicability of Build America, Buy America.</p>

	apply to projects funded by the Broadband Infrastructure Gap Networks Grant Program, Solicitation No. 2024-MBI-01?	
17.	Under the outlined conditions in section 4.4.3., and considering the likely presence of existing wired or wireless infrastructure in a PSA by incumbent providers, how will MBI evaluate and potentially approve incumbent proposals for overbuilding, particularly the construction of fiber or equivalent infrastructure in place of the incumbent's pre-existing obsolete infrastructure?	MBI will conduct appropriate due diligence to evaluate the nature, extent and necessity of any proposed overbuilds.
18.	In the evaluation process, would applicants showcasing speeds and reliability substantially surpassing the minimum requirements be granted a more favorable consideration as potential partners, and if so, could the criteria or benchmarks defining "significantly beyond" be clarified in the context of partnership attractiveness? The goal here being to incentivize robust, future-forward standards vs. just meeting the bare minimum	Speed offerings that exceed the 100/100 minimum are scored higher than speeds that meet the 100/100 minimum. Please refer to 8.2.2.4(C) in the grant solicitation for further details on point allocations related to the maximum broadband speed tier offered by the applicant.
19.	Will recipients of the MBI GAP funding be mandated to leverage and implement the new FCC broadband labels, how will MBI reconcile the integration of these labels to guarantee customer transparency and awareness, and what specific mechanisms or strategies will be employed to address potential compliance failures in the deployment or delivery process	Applicants are required to apply with all applicable laws, including the Order(s) issued by the Federal Communications Commission relative to Broadband Consumer Labels. More information on Broadband Consumer Labels can be found on the FCC's website at https://www.fcc.gov/broadbandlabels .
20.	Will MBI factor in the consumer performance history and feedback compiled by the Department of Telecommunications and Cable for GAP applicants, especially those with subpar performance track records?	MBI will apply the detailed evaluation criteria listed in section 8.2 of the grant solicitation.
21.	Please confirm whether an Applicant can use existing, new, non-depreciated equipment and materials as part of their Funding Match or otherwise account for the actual costs of such equipment and materials.	Please refer to section 5.2 of the grant solicitation, which states "In-kind contributions including, but not limited to, manufacturer or vendor discounts, income generated from the proposed project, and non-cash items including existing infrastructure, land, or other pre-existing inventory or facilities, will not be accepted as part of an Applicant's Funding Match."
22.	Please confirm Plan Speeds and Costs in section 5.1(4)(b) may be estimated.	The applicant should provide Plan Speeds and associated Costs that will be advertised to customers to be served in each proposed Project Service Area (PSA).
23.	Please confirm an organizational chart in response to 5.2(2)(a)(i) may be limited to only show relevant entities based on the applicant, rather than all affiliates.	Yes, the organizational chart may be limited to relevant entities, provided that the applicant should also show the direct relationship with its parent company if the parent company will be providing financial support to the applicant.

24.	Please confirm whether and how Applicants can suggest edits to the proposed grant agreement.	Applicants can either (1) redline the downloadable MS Word version of the Gap Networks Federally Funded Grant Agreement template; or (2) provide a list that clearly describes all proposed edits. The redlined version of the agreement or list of all proposed edits can be uploaded as a supporting document in Section 3.5 of the online grant application.
25.	Please confirm whether applications that are not funded in Round 1, will be rolled over automatically into Round 2 for consideration of funding. Additionally, will Round 1 applications be held confidentially until Round 2 is closed?	<p>MBI will clarify the disposition of Round 1 applications prior to the opening of Round 2, including whether any Round 1 applications will be rolled over into Round 2.</p> <p>Round 1 applications will be exempt from public disclosure until Round 2 has closed, pursuant to Mass. Gen. Laws Chpt. 4, §7(26)(h).</p>
26.	We have used local ARPA funding to start the survey requests for some of our BSLs and have determined that we are not able to complete the process without the GAP funding. Can we finish this process using state ARPA if we have used Local ARPA on earlier portions of the projects?	Gap Networks Grant Program funding is not allowed to be used for survey activities as described in the question.
27.	Since we use MBI as our Middle Mile we consider all of Greenfield Infrastructure as Last Mile. Do you concur?	Yes.
28.	8.2.2 sub D. What is included in grant applications pricing for service? I.E Is the price absent of all discounts and promotional/introductory prices? Is all inclusive (including equipment and fees/taxes)?	Section 8.2.2.1(D) explains that pricing should include all related fees that will be charged to customers, such as equipment and other fees. The pricing should be the standard rates and should not reflect discounts, promotional or introductory pricing.
29.	We believe Greenfield’s unserved locations should be divided into three different PSAs due to requirements, i.e. delivery medium such as aerial and underground using conduit and locations. Can we do this or is one municipality considered one PSA?	A Project Service Area (PSA) is one municipality or a set of geographically contiguous municipalities. PSAs may not be broken up or delineated on the basis of construction type.
30.	4.5.1 Can you define “construction and installation” and “Network Equipment, fiber/cabling/facilities, and materials”? We are looking for a definition to be sure we can use this to purchase construction equipment to enable us to use inhouse labor versus third party contractors (which is much more expensive).	<p>“Construction and installation” is directly associated with the cost of the labor and construction equipment used during the installation of broadband infrastructure.</p> <p>“Network Equipment, fiber/cabling/facilities, and materials” is directly associated with the cost of fiber optic cables, networking devices, electronics devices, facilities, poles</p>

		<p>and other hardware. <ask Lisa to check this></p> <p>General use of construction equipment is not an allowable cost under this program. The portion of the depreciation of the construction equipment related to the project can be included as a direct cost during the period of performance.</p>
31.	<p>8.2.2.2 Sub A, 1 Request of application and parent company. We are applying as GCET and is our Parent Company the City of Greenfield? Do you need both sets of financials?</p>	<p>Yes. Five years of audited financial statements or financial records should be provided for both the applicant and parent company.</p>
32.	<p>What are the ACP documents needed?</p>	<p>Applicants that are already participating in the Affordable Connectivity Program may provide a screenshot from the USAC online search tool that is available at https://cnm.universalservice.org/. The USAC search should be set on the home internet filter. If you are not currently participating in ACP then you need to submit the documentation explained in section 4.1.2. of the grant solicitation.</p>
33.	<p>Does an MLP/Municipality need a Certificate of Compliance? And is there a standard form for this?</p>	<p>The officer certification of compliance is required by all Applicants. While MBI has not published a standard form, the Certificate of Compliance must, at a minimum, attest to compliance with (1) local, state, and federal tax laws; (2) all applicable regulatory requirements. The certificate of compliance must be signed by an officer of the applicant.</p>
34.	<p>Organizational Capacity, requests for personal resumes, are job descriptions sufficient for this request?</p>	<p>Applicants must provide resumes or appropriately detailed bios for the key project personnel.</p>
35.	<p>Can Massachusetts Technology Collaborative confirm that the proposal due date is 12/20/2023 at 5 pm EST, and that the December 11, 2023 deadline for Round 1 of the Gap Networks Grant Program will not impact the submittal date for proposals?</p>	<p>There is only one deadline for the submission of applications and all supporting materials for Round 1, which is December 11, 2023 at 5:00 pm.</p>
36.	<p>If the applicant provides its own data regarding unserved and underserved locations, what methods/processes for collecting the data will MBI accept?</p>	<p>Applicants should match their unserved and underserved locations to the MBI BSL data or FCC Fabric and provide the matching unique BSL_ID for the MBI data or Location_ID for the CostQuest FCC Fabric. If a location is not in the MBI or FCC BSL datasets, include the location with the address</p>

		data source set to "Other." If the unserved/ underserved status does not match the MBI or FCC maps, set the Current Service Source to "Other."
37.	Will this webinar be recorded and the link available after the fact?	Yes, there is a recording of the webinar and the recording has been published on the procurement page for this program on the MBI website. You are able to download and/or stream the recording.
38.	My question regarding the MBI "Broadband Infrastructure Gap Networks Grant Program" is our eligibility as a state agency— Massachusetts Department of Correction (DOC). While "public safety entities" were listed as a "Community Anchor Institution," it was unclear as to where the DOC qualified both as an agency and potentially in terms of individual facilities (prisons and buildings). Any clarification in this area is greatly appreciated	The Massachusetts Department of Correction (DOC) would only be an applicant for Gap Networks Grant Program funding if the DOC intends to design, construct, own and operate the broadband network that will serve all unserved and underserved locations in the proposed Project Service Area. DOC facilities would be eligible locations if they are unserved or underserved.
39.	Massachusetts Department of Correction (MA DOC) – a state correctional agency that operates 14 prisons across the state is interested to apply for this grant. However it's not clear if the department qualifies to be an applicant. 4.1.1. Eligible Entities The following entities are eligible for grant application submission: Private entities (e.g., corporations, limited liability companies, general partnerships, limited partnerships, etc.). Local governmental entities (e.g., municipalities or municipal light plants that offer broadband service), Native American Indian Tribes, and non-profit organizations. Co-operatives, electric co-operatives, and utilities. Public Private Partnerships, which are long-term agreements between local government entities and private entities for the delivery and funding of broadband services. Other entities that develop and/or operate broadband networks and can demonstrate the experience, capacity and financial resources and stability to satisfy the grant obligations. Please advise if MA DOC is eligible to submit an application.	The Massachusetts Department of Correction (DOC) would only be an applicant for Gap Networks Grant Program funding if the DOC intends to design, construct, own and operate a broadband network that will serve all unserved and underserved locations in the proposed Project Service Area. DOC facilities would be eligible locations if they are unserved or underserved.
40.	Providers generally define 1 Gbps speed as a number close to but not precisely 1 Gbps due to factors such as "overhead" usage that consume part of the theoretical top speed. This is common industry practice that the FCC has recognized in its universal service program. Will you clarify that proposed projects that serve passings with 1 Gbps symmetrical speeds are understood to include speeds close to 1 Gbps and will earn maximum points	Scoring will be based on the Applicant's advertised speeds. Please note that this answer is separate and distinct from the process that MBI will utilize to determine whether the applicant has achieved final completion of a broadband network

	<p>under the evaluation criteria provided at page 16 in the program guidelines? (See Connect America Fund, <i>FCC DA 18-710</i>, released July 6, 2018, at Paragraph 55) (noting that, because of technical limitations, it is unrealistic to expect that providers obligated to provide gigabit service, i.e., speeds of 1,000 Mbps, achieve actual speeds of 1,000 Mbps download at the customer premises because, among other reasons, typical customer premises equipment, including equipment for gigabit subscribers, permits a maximum throughput of 1 Gbps, and the overhead associated with gigabit Internet traffic (whether in urban or rural areas) can reach up to 60 Mbps out of the theoretical 1 Gbps; customer premises equipment with higher maximum throughput are generally more costly and not readily available; and thus, even if a gigabit provider were to overprovision its gigabit service, the subscriber would not experience speeds of 1,000 Mbps). For the Connect America Fund, the FCC “requires gigabit carriers to demonstrate that 80 percent of their testing hours download speed tests are at or above 80 percent of 1,000 Mbps, i.e., 800 Mbps.” See DA 18-710 at Paragraph 55.</p>	<p>that delivers residential or commercial service, as appropriate, that reliably meets or exceeds 100 Mbps symmetrical speeds.</p>
<p>41.</p>	<p>According to the “Key Dates” timeline on the FCC’s Broadband Data Collection web page (fcc.gov/BroadbandData), the FCC expects by the end of this month (November 2023) to update its National Broadband Map to show Fabric Version 3 location data and broadband availability data as of June 30th, 2023 (National Broadband Map Version 3). Depending on when National Broadband Map Version 3 is released, it will be difficult if not impossible for applicants to incorporate the new data into their proposals by the December 11th application deadline. A deadline extension of at least 45 days would be necessary so that applicants avoid spending time and resources working to finalize grant applications based on current information only to have to significantly alter or even abandon those in-progress applications after National Broadband Map Version 3 is released. Please confirm that MBI expects applicants to propose projects based on National Broadband Map version 2 and, if MBI expects otherwise, please advise whether a deadline extension will be granted to allow applicants sufficient time to incorporate the new data into their proposals.</p>	<p>Applicants should use the most current version of the data to conduct their analysis. MBI will use the most current version of the data available at the time of our review. MBI will follow-up with Applicants regarding any discrepancies found between the versions.</p> <p>The submission deadline will not be changed for Round 1. All Round 1 applications must be submitted by 5:00PM on December 11, 2023.</p>
<p>42.</p>	<p>We appreciate MBI’s recognition that there are differences between MBI and FCC maps regarding the service status of Broadband Serviceable Locations (BSLs). What data points would be most useful for MBI to receive from applicants to demonstrate a BSL’s unserved or underserved status and help resolve discrepancies between MBI and FCC data?</p>	<p>MBI expects Applicants to do their own due diligence to confirm that the proposed locations are unserved or underserved. The Address Data Template contains a Current Service Source that should be populated with “MBI Map”, “FCC Map”, “Applicant” or “Other.” Applicants should be confident in the unserved and underserved locations submitted. MBI will follow-up with Applicant if the sources are specified are “Applicant” or “Other.”</p>

43.	Do Community Anchor Institutions qualify for this funding? If so, do you have an inventory of Anchor Institutions that are eligible?	Community Anchor Institutions (CAIs) are eligible locations if they fit the definition of unserved or underserved. MBI does not have an inventory of eligible CAIs.
44.	Was a PDF of the grant application template posted on the MBI website yesterday? We've been unable to locate it.	The PDF of the grant application overview and requirements has been published. The online application became available on 11/16/23.
45.	<p>We are a small town that has several locations that are not served by Comcast, and are looking for financial resources that might help us extend those networks, and provide resources to help pay for customer connections. The "Gap Networks Grant Program" sounds like a great option, but the requirement that the applicant participate in the ACP (info here) is confusing. Would the Town, as principal applicant, be required to fund subsidies for internet service for income-qualifying residents? Or am I misreading the nature of that program?</p> <p>Any assistance you can provide would be helpful.</p>	Funding under the Gap Networks Grant Program is available to eligible entities that will design, construct, own and operate a broadband network that will serve all unserved and underserved locations in a proposed Project Service Area. The Town would be the applicant only if it intends to take on these responsibilities. All awardees are required to participate in the Affordable Connectivity Program.