



Louisiana Broadband Equity Access and Deployment (BEAD) Subgrant Program (GUMBO 2.0) Frequently Asked Questions (FAQs)

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This document lists questions posed about the GUMBO 2.0 program from prospective applicants and other stakeholders and summarizes answers provided by ConnectLA. The purpose of this list is to provide supplemental information and transparency to all parties with an interest in the state's historic BEAD program. Nothing in this FAQ list nor any other supplemental guidance provided by ConnectLA is intended to modify Louisiana's approved Initial Proposal Volume 2 (IPV2). All GUMBO 2.0 prospective participants must thoroughly review IPV2 to familiarize themselves with all program requirements prior to submitting applications.

Additionally, the SPA list released in conjunction with the FAQ Version 2.0 list is based upon BEAD eligible locations that have not yet received NTIA approval. However, ConnectLA does not anticipate any major changes to the SPAs following NTIA's approval of the underlying BEAD eligible location data. Once the eligible location list is approved by NTIA, ConnectLA will publish the final SPAs as well as a summary of any changes between the current SPA list and final SPA list.

This FAQ list will be updated as the GUMBO 2.0 program proceeds.

Helpful Links:

[IPV2](#)

[Pre-Qualification Application Guide](#)

[Anti-Collusion Certification](#)



Table of Contents

Pre-Application and Prequalification Period.....	2
Pre-Qualification Requirements	3
Sub-Project Areas (SPAs).....	5
Application Scoring and Selection	9
Separable SPAs and Other Adjustments to Included Locations in an Award	11
Extremely High-Cost Location Threshold (EHCT)	12
Joint Applications and Consortiums	13
Low-Cost Service Option	14
Other Obligations of Subgrantees	14
Requirements Prior to Grant Agreement Execution.....	15
Challenge Process.....	16

Pre-Application and Prequalification Period

WHAT IS THE TOTAL AMOUNT OF FUNDING THAT WILL BE AVAILABLE FOR THE BEAD / GUMBO 2.0 PROGRAM?

The total allocation provided to Louisiana is \$1.355 billion.

WHAT IS THE EXPECTED TIMELINE LEADING UP TO THE OPENING OF THE QUALIFICATIONS SUBMISSION (PRE-QUALIFICATION) AND ROUND 1 APPLICATION WINDOWS?

The pre-qualification window will officially open on July 1, 2024, and extend across a two-week timeframe and conclude on July 14, 2024. Following the close of the prequalification period, the ConnectLA team will begin its review process, during which ConnectLA will contact you if further clarification or information is needed. The review process will last 30 days and conclude on August 14, 2024, after which you will be notified if you have met the required criteria to participate in the program.

It is imperative that all interested providers complete the prequalification process to participate in the GUMBO 2.0 program. Without prequalification status, you will be unable to apply for grant funds later this year.

WHAT SHOULD PROSPECTIVE APPLICANTS DO NOW TO BE PREPARED FOR GUMBO 2.0?

All interested GUMBO 2.0 applicants should thoroughly familiarize themselves with the requirements of Louisiana’s approved [IPv2](#) and BEAD program guidance from NTIA. With respect to Pre-Qualification materials, IPv2 Exhibit D includes a comprehensive list of BEAD-required qualifications, most of which reflect standard BEAD program requirements that have been thoroughly documented in NTIA guidance

materials. Applicants will benefit from reviewing these requirements even in advance of ConnectLA's release of the Pre-Qualification submission requirements.

Pre-Qualification Requirements

WHAT INFORMATION IS NEEDED TO BE DESIGNATED AS AN AUTHORIZED ORGANIZATIONAL REPRESENTATIVE (AOR) IN THE PRE-QUALIFICATION PORTAL?

Full name, Title, Email, Phone number & document on company letterhead (signed by the head of the organization) or board resolution stating AOR is the authorized official of the organization and has the legal authority to contract on behalf of the organization. The document should be uploaded to the portal in PDF format.

WHAT LEVEL OF DETAIL WILL BE REQUIRED FOR PRE-QUALIFICATION MATERIALS VERSUS FINAL REQUIREMENTS FOR THE GRANT AWARD?

ConnectLA recognizes that at the Pre-Qualification stage, applicants will not know all necessary details of eventual final grant awards, such as funding amount award levels and specific included BSLs. Accordingly, the focus of Pre-Qualification review will be on demonstrating minimal compliance with BEAD-required categories as outlined in [IPv2](#) Exhibit D. Full proposed project budgets and technical engineering plans, for example, are not required during Pre-Qualification.

WHAT IS THE LETTER OF CREDIT REQUIREMENT DURING PRE-QUALIFICATION?

At the Pre-Qualification stage applicants must attest/certify that they will provide a Letter of Credit to ConnectLA prior to entering into grant agreement. Additionally, applicants must describe their plans for meeting the BEAD Letter of Credit requirement with sufficient specificity for ConnectLA to verify that the applicant has a good-faith basis for attesting to its ability to meet the requirement including identifying which qualified financial institutions they will rely on to implement which options under the NTIA Limited Waiver they plan to utilize. For further clarification, see question #15 of the Pre-Qualification Application Guide.

WHAT OWNERSHIP INFORMATION IS REQUIRED DURING PRE-QUALIFICATION FOR JOINT OR CONSORTIUM APPLICATIONS? FOR EXAMPLE, ARE MOBILE PROVIDERS THAT ARE WORKING WITH FIXED PROVIDERS REQUIRED TO BOTH SUBMIT PRE-QUALIFICATIONS?

In the case of entities comprising more than a single party, such as a joint or consortium application, ownership information must be submitted for each participant in the multi-party entity. In addition, the underlying consortium agreement between the parties must also be uploaded in order for ConnectLA to assess whether the underlying obligations amongst the parties provide for sufficient operational, technical, and managerial commitments to meet BEAD program requirements.

WHAT ELSE SHOULD PROSPECTIVE APPLICANTS UNDERSTAND ABOUT THE PRE-QUALIFICATION PROCESS?

As part of Pre-Qualification, applicants must certify and acknowledge a number of BEAD program requirements, including national program-wide requirements by the NTIA as well as Louisiana-specific requirements included in [IPv2](#). All prospective applicants should take care to review these binding certifications that will apply upon the submission of a Round 1 application.

ARE PARENT COMPANY AUDITED FINANCIALS ACCEPTABLE AS LONG AS THE FINANCIAL RELATIONSHIP BETWEEN THE PARENT COMPANY AND SUBSIDIARY IS MADE CLEAR?

If applying as a consortium, please upload audited financial statements that have been certified by an independent certified public accountant for the last 3 years for each participant in the consortium.

ARE THERE REQUIREMENTS FOR COLLABORATION AND LETTERS OF RECOMMENDATION FROM LOCAL MUNICIPALITIES?

There are no required letters of recommendation. However, it is highly recommended to communicate and establish relationships with local leaders in SPAs that you intend to apply for.

WILL THE 2023 AUDITED FINANCIALS BE REQUIRED PRIOR TO AWARD, OR ARE THE 2022 AND PRIOR YEARS SUFFICIENT (IF YOU ARE UNSURE IF 2023 WILL BE COMPLETE BY THEN)?

Yes, most recently completed audits must be submitted at the time of prequalification. If the 2023 audited financials are not yet complete at the time of prequalification, please submit the 2022 audited financials. Once the 2023 audited financials are completed, please provide them to ConnectLA. V

REQUIREMENTS NOTE THAT PROJECT PLANS MUST BE CERTIFIED BY A PROFESSIONAL ENGINEER, ARE WE EXPECTED TO PROVIDE THIS DURING PREQUALIFICATION?

The ConnectLA team realizes that at this stage you may not have the detailed network design, diagram, project costs, build-out timeline, and milestones, etc. as you have not yet decided how you will apply. Please provide a description of your company's baseline Fiber-To-The-Home/FTTH (or other technology) architecture to be deployed, **including a certification by a professional engineer that said architecture can provide the required service levels.**

As part of its Conditional Limited Programmatic Waiver and Clarification of Professional Engineer Certification, NTIA has clarified the following "the professional engineer making certifications in connection with the professional engineer certification requirement may be licensed in any of the 56 Eligible Entities." Based on this clarification, ConnectLA will accept professional engineers certified in any of the 56 Eligible Entities, which include all 50 states and the following recognized territories: American Samoa, District of Columbia, Guam, Northern Mariana Islands, Puerto Rico, and US Virgin Islands.

Please visit NTIA's website for additional information on the waiver and clarification [here](#).

Additionally, please note that full details, including the detailed network design, diagram, project costs, build-out timeline, and milestones, etc. will be required upon award.

ARE THERE FILE SIZE LIMITATIONS FOR DOCUMENTATION UPLOADED INTO THE PREQUALIFICATION PLATFORM?

Recommended file sizes should be 100 megabytes or less. However, if you have larger file sizes, please contact the Ready platform's help desk at lahelpdesk@ready.net.

ONCE A POOL OF PRE-QUALIFIED APPLICANTS IS ESTABLISHED, IS THERE A WAY FOR OTHER PROVIDERS TO APPLY FOR BEAD FUNDS WHO DID NOT PARTICIPATE IN PRE-QUALIFICATION?

No. Only entities approved via Pre-Qualification will be permitted to apply for BEAD funds in the GUMBO 2.0 subgrant process.

The sole exception to this rule stems from the BEAD program requirement that states pursue "direct negotiations" with available providers in the event any eligible BSLs remain without awards upon the conclusion of the primary application process.

Sub-Project Areas (SPAs)

WHAT IS A SUB-PROJECT AREA (SPA)?

Per section 2.4.1 of IP Volume 2: GUMBO 2.0 will use an overall approach of organizing the eligible locations in the state into a set of pre-defined areas, or "sub-project areas." Prospective subgrantees in Louisiana will have wide flexibility to define their proposed overall deployment projects, but such proposals must be submitted in the form of sets of SPAs. By including an SPA in an application, the provider commits to reach all included eligible locations.

Per section 2.4.6 of IP Volume 2: ConnectLA notes that given the distribution of BEAD-eligible locations throughout the state, GUMBO 2.0 SPAs are expected to include a diverse mix of unserved, underserved and served locations; however, only the individual eligible locations within an SPA shall be considered Unserved Service Projects or Underserved Service Projects for BEAD eligibility purposes. In other words, in GUMBO 2.0 the SPA shall function as an "application unit" to be used in submitting applications, but only individual eligible locations shall be treated as Unserved Service Projects or Underserved Service Projects that are eligible to receive BEAD subgrant funding.

HOW WERE THE SPAS DEVELOPED?

A clustering process, using the statewide list of BEAD-eligible locations and a combination of geospatial and statistical analysis, aggregates the BEAD-eligible locations into SPAs. To align with the requirements established in the LA IP Volume 2, the SPAs have been constrained to not cross parish borders. The ConnectLA Sub-Project-Area is a collection of eligible locations driven by the following parameters:

- Target SPA Size in BSLs: 800
- Maximum Hex Separation Distance (ft): 25,000
- Minimum Hex per Cluster: 5
- Maximum Distance to Cluster Centroid (ft): 25,000

Louisiana GUMBO 2.0 FAQs

- Maximum Hex Separation Distance (ft): 15,000
- Minimum BSLs per Square Mile: 5
- Maximum Search Distance (Ft): 264,000

For further details regarding SPAs please see, the IPv2 section 2.4.1 and 2.4.6.

HAVE ANY CHANGES BEEN MADE TO THE LIST OF SUB-PROJECT AREAS (SPAS) THAT ADDRESS ISSUES HIGHLIGHTED IN THE PUBLIC COMMENT CYCLE?

Several public comments noted that some SPAs were subdivided by waterways. The algorithm that creates the SPA groupings was modified to test if roadways interconnected the BSLs within the SPA. If one or more BEAD-eligible BSLs within a cluster were isolated from the road network, the algorithm could separate the BSLs from the rest of the cluster. This approach led to an overall increase in the quantity of SPAs. A summary of the comments received, and the resolutions taken are included in the following table:

Comment Category	Count of Comments	Percent of Comments	Category Type	General Category Description	Resolution
CAI ID	40	1.3%	Location Related	The CAI ID is not in the fabric	There is no resolution for this. There are CAI's in the CLA program which are not in the FCC fabric. These locations have a LocationID that starts with a "2".
CAI Location	1,376	45.7%	Location Related	The CAI location does not have a Latitude or Longitude	These records will be addressed in the final version of Eligible locations approved by NTIA.
CRN	54	1.8%	SPA Related	The identification of the SPA as a CRN is at issue	The identification of a SPA as a CRN is being reviewed and subject to change in the final SPAs that will be published.
Fabric Inaccurate	416	13.8%	Location Related	The FCC provided BSL is considered inaccurate	There is no resolution for this. Per the NTIA's guidelines, the FCC Fabric locations cannot be challenged.
Fabric V4	109	3.6%	Location Related	The FCC provided BSL in V3.2 of the Fabric is not in V4 of the Fabric.	There is no resolution for this. ConnectLA is using version 3.2 of the FCC Fabric.
Location Coverage	846	28.1%	Location Related	The eligibility of the BSL is being challenged	There is no resolution for this. ConnectLA ran a coverage challenge process and the current output of the challenge is final.
Not Clear	1	0.0%	SPA Related	The description was not clear as to why the SPA was being challenged	There is no resolution for this.
SPA Challenging	26	0.9%	SPA Related	The BSLs included in the SPA are challenging to provide service to	The membership of SPAs is being reviewed and subject to change in the final SPAs that will be published.
SPA Highway	1	0.0%	SPA Related	The BSLs included in the SPA exist on two sides of a highway	The membership of SPAs is being reviewed and subject to change in the final SPAs that will be published.
SPA Membership	18	0.6%	SPA Related	The BSLs included in the SPA should be assigned to another SPA	The membership of SPAs is being reviewed and subject to change in the final SPAs that will be published.
SPA RFA	13	0.4%	SPA Related	The SPA's Reference Funding Amount is insufficient to cover the anticipated build cost	The Reference Funding Amount for SPAs is being reviewed and subject to change in the final SPAs that will be published.
SPA Water	110	3.7%	SPA Related	The BSLs included in the SPA exist on two sides of a body of water (river, lake, etc.)	The membership of SPAs is being reviewed and subject to change in the final SPAs that will be published.
Grand Total	3,010				

HOW WILL REFERENCE FUNDING LEVELS FOR EACH SPA BE CALCULATED?

Reference funding levels will be established using the per-BSL cost data provided by NTIA to states in the “Eligible Entity Toolkit.” Reference funding for a given SPA will reflect this baseline assessment of required investment of BEAD funds given deployment costs and overall business case in a given local area.

ConnectLA emphasizes that reference funding levels are not intended as a precise prediction of required funding for any particular provider, nor to function as a maximum permissible funding level. Instead, reference funding levels are simply an objective tool based on neutral, third-party data for comparing BEAD funding requests as between different project proposals, especially those that overlap in some SPAs but not in others.

For further details regarding funding levels for SPAs please see IPv2, Section 2.4.6

WILL THE FINAL LEVELS ANNOUNCED PRIOR TO THE BEGINNING OF ROUND 1 CHANGE LATER IN THE PROCESS?

As provided in [IPv2](#), reference funding levels for SPAs included in no application in Round 1 may be increased in Round 2 in order to provide additional incentive for new Round 2 coverage of such SPAs. Any SPA that is included in at least one Round 1 application will see no change in reference funding level.

HOW WILL REFERENCE LEVELS FOR ROUND 1 SPAS RELATE TO THE MAXIMUM FUNDING LEVEL THAT CONNECTLA WOULD AWARD?

Under the rules of IPv2, during the primary Round 1 and Round 2 application review process, the maximum funding that may be requested for a SPA is 200% of the reference funding level. This constraint exists in order to allow the 2-round process to proceed in a more automated fashion. However, 200% of the reference funding is not itself a limit on permitted funding; instead, the only fundamental constraint on funding for a given project is the state’s total BEAD allocation.

Therefore, as an example, an award higher than 200% of the prior reference funding level could result from a direct negotiation step after the end of Round 2, as long as sufficient BEAD funds remained available.

HOW ARE THE BEAD ELIGIBLE LOCATIONS DETERMINED?

Louisiana State BEAD challenge process, modifications, and de-duplication as approved in IP Volume 1, and as validated by NTIA.

HOW WERE ED SPAS DETERMINED?

Per section 2.4.1 of IP Volume 2: Certain SPAs will be designated as “Economically Disadvantaged” based having particularly poor business cases for broadband deployment; these SPAs will receive additional scoring weight in order to create an incentive for providers to serve these traditionally left-behind regions of the state. Specifically, ConnectLA has relied on BEAD High-Cost Areas as determined by NTIA in making Economically Disadvantaged designations.

HOW WERE CRN SPAS DETERMINED?

Per section 2.11.1 D of IP Volume 2: The GUMBO 2.0 subgrant process identifies certain areas of the state as “Critical Resiliency Need” Sub-project Areas (CRN-SPAs) that lack the minimal mobile broadband service needed to afford residents and businesses access to mobile communications in the critical times before, during, and after a natural disaster when access to fixed communications infrastructure may be disrupted. These targeted commitments to deploy new mobile broadband infrastructure as a resiliency solution in areas also benefiting from new BEAD-funded fixed infrastructure will advance both the BEAD goals of improved broadband access and climate resiliency. Specifically, a CRN-SPA shall be an SPA in which any BSL lacks access to at least 5G mobile service from at least one facilities-based mobile provider, as reported via the most recent FCC Broadband Data Collection data as of the time of SPA designation.

AFTER THE BEGINNING OF ROUND 1, CAN SPAS CHANGE?

No. The SPAs cannot change once final. The only attribute that can change, per IP Volume 2, is the reference funding amount which can change at the discretion of the state after Round 1.

HOW DO I PROVIDE PUBLIC COMMENTS TO CONNECTLA ON SPA BOUNDARIES OR REFERENCE FUNDING?

Public comments were accepted by the office from April 18, 2024, through May 18, 2024. ConnectLA used comments received to assist in determination of final SPAs and reference funding to best achieve the goals of the BEAD program in LA, as provided in approved IP Volume 2. See table summarizing comments and ConnectLA’s response in question above.

CAN YOU EXPLAIN THE MEANING OF “WIDE FLEXIBILITY” TO DEFINE THEIR PROPOSED OVERALL DEPLOYMENT PROJECTS IN RELATION TO SPAS?

This means a proposed project may be as small as one SPA or as large as all SPAs

WHY ARE THERE LOCATION_ID IN THE LIST OF ELIGIBLE LOCATIONS THAT BEGIN WITH A “2”? THESE DO NOT MATCH ANY LOCATION_ID IN THE NTIA FABRIC DATASET AND ARE INCONSISTENT WITH THE COSTQUEST LOCATION_ID STANDARD.

While identifying eligible locations, Louisiana found CAIs that are not currently included in the fabric and thus do not have an official location_id. These locations were assigned a preliminary location_id that begins with a “2.” This ensures they are not confused with the official fabric location_id and provides a basis for tracking the locations as they proceed through the NTIA BEAD process.

WHY ARE THERE LOCATION_ID IN THE LIST OF ELIGIBLE LOCATIONS THAT ARE NOT IN THE LATEST VERSION OF THE FABRIC?

The LA BEAD eligible list of locations is based on v3.2 of the NTIA release. Location changes made after that release will not be included in the BEAD eligible list.

Application Scoring and Selection

WILL THERE BE A USER GUIDE FOR SUBMITTING GUMBO 2.0 APPLICATIONS?

Yes. It will be released for review by prospective applicants in advance of Round 1.

WILL APPLICANTS BE ABLE TO DO A “DRY RUN” TO TEST THE APPLICATION PROCESS BEFORE FORMAL ROUND 1 SUBMISSIONS ARE REQUIRED?

Yes. Applicants will receive application bidding platform training and a full “mock application” process will be made available to prospective applicants in advance of Round 1.

WHAT ARE THE CRITERIA FOR AN AWARD AFTER ROUND 1? IS THERE ANY FLEXIBILITY TO AWARD A “DECISIVELY HIGHER SCORE” THAT IS NOT QUITE 100 POINTS BETTER THAN A COMPETING APPLICATION, BUT THAT CONNECTLA VIEWS AS A STRONG APPLICATION?

No. The requirements of [IPv2](#) must be followed, and section 2.4.2 clearly establishes that the “decisively higher score” criterion is a 100-point difference.

Note, however, that applicants are not required to reduce requested funds nor make any other changes to an application from Round 1 to Round 2. Therefore an “almost 100 points better” application in Round 1 would begin Round 2 with a significant advantage even if the applicant makes no changes.

WILL AN APPLICATION THAT ONLY OVERLAPS WITH ANOTHER APPLICATION FROM THE SAME APPLICANT (“SELF-OVERLAP” ONLY) BE AWARDED IN ROUND 1?

[IPv2](#), section 2.4.6 provides that “subgrantees may submit any number of applications (comprising one or more SPAs) in Round 1 and are also permitted to include the same SPA in up to two separate applications...” (emphasis added). Section 2.4.2 separately provides that one category of Round 1 awards is “FTTH applications that do not overlap with any other application of any technology type, and that request funding no greater than the reference funding levels for all included SPAs.” (emphasis added) For purposes of these two rules, an application that overlaps only with a second application from the same applicant therefore will not be awarded in Round 1, as such “self-overlap” is a form of “overlap with any other application.”

WHICH APPLICATION WILL BE SELECTED IF TWO APPLICATIONS FROM THE SAME APPLICANT “SELF-OVERLAP” IN ROUND 2?

In Round 2, “self-overlap” will be treated no differently than the general case of “conflicting overlap” with another applicant. In other words, in Round 2, if two applications from the same applicant overlap only with each other, the higher priority or higher scoring application will be awarded and the second will be subject to the standard de-confliction process outlined in section 2.4, including the application of any applicable separable SPA preferences for the lower-scoring application.

IF A PROVIDER HAS OPERATED IN LOUISIANA FOR AT LEAST FIVE YEARS WITH A CLEAN FEDERAL AND STATE LABOR LAW COMPLIANCE RECORD, WHAT ELSE IS NECESSARY TO ACHIEVE THE FULL 101 POINTS IN THE FAIR LABOR PRACTICES PRIMARY SCORING CATEGORY?

If an applicant has a record of federal and state compliance for at least 5 years, it automatically receives 91 points. Additionally, that provider receives 10 points for having a plan that complies with the minimal requirements in the Fair Labor Plan as defined in [IPv2](#) section 2.7.1.B. See section 2.4.2.1(3) for a full description of the Fair Labor scoring rubric.

HOW WILL CONNECTLA MEASURE THE 90% REQUIREMENT FOR BURIED FIBER TO ACHIEVE A SCORING BONUS?

During the main application process, applicants will be asked whether a given application includes a commitment to 90% buried fiber. If that option is selected and the application is selected, the applicant will be required to submit full technical engineering information for the deployment project associated with the grant award verifying that at least 90% of the linear mileage of new fiber to be deployed using subgrant support will be buried.

WITH RESPECT TO POINTS AWARDED FOR INFRASTRUCTURE HARDENING, IS THERE ANY OPPORTUNITY TO DEMONSTRATE THAT THE BURIED FIBER REQUIREMENT IS INFEASIBLE IN A GIVEN SPA?

No. GUMBO 2.0 will leave the determination as to whether buried fiber is feasible in a given area up to the competitive process. If in fact buried fiber is not feasible then no applicant will include that scoring element.

IS THERE ANY ABILITY FOR A FIXED-ONLY APPLICANT TO WIN THE POINTS FOR WIRELESS TOWER/MOBILE BROADBAND INFRASTRUCTURE COMMITMENTS IN CRITICAL RESILIENCY NEED (CRN) SPAS?

The only way to secure CRN-SPA points is to make the commitment to deploying new mobile broadband infrastructure, as provided in [IPv2](#) section 2.4.2.1(4) and 2.11.1.D. That commitment may be delivered via joint application or contractual agreements between providers with respective capabilities in FTTH and mobile broadband infrastructure.

HOW ARE BONUS POINTS FOR ECONOMICALLY DISADVANTAGED AREAS, INFRASTRUCTURE HARDENING AND RESILIENCY COMMITMENTS, AND NUMBER OF LOCATIONS IN A PARISH AWARDED TO DIFFERENT APPLICATIONS BY THE SAME APPLICANT? IF A PROVIDER, FOR EXAMPLE, SUBMITTED 15 APPLICATIONS FOR DIFFERENT SPAS IN A PARISH, WOULD THE PROVIDER ONLY RECEIVE THE BONUS POINTS PER APPLICATION?

All scores are determined solely at the application level. In the example mentioned, each of the 15 applications would be scored separately based on the number of included BSLs in each application. The same approach applies for all other scoring categories.

HAS A PAYMENT PROCESS BEEN ESTABLISHED FOR FUND REIMBURSEMENT AFTER COMPLETING A PROJECT MILESTONE?

A process has not yet been established but will be detailed and released to award recipients at a later date.

Separable SPAs and Other Adjustments to Included Locations in an Award

AT WHAT POINT IN THE ROUND 2 REVIEW OF APPLICATIONS WILL THE DESIGNATION OF “SEPARABLE” SPAS WITHIN AN APPLICATION BE LOOKED AT BY CONNECTLA? WHAT IS THE ORDER OF OPERATIONS IN ROUND 2 FOR THESE SPAS?

“Separable” SPAs within an application will be resolved during Round 2 as follows:

Round 2 applications remain fully “intact” – with underlying separable SPA designations not visible to the application process – until the application is determined to overlap with at least one other higher-scoring application (also noting that FTTH applications receive selection priority over non-FTTH applications, as provided in [IPv2](#) section 2.4.6).

Upon identification of such an overlap condition, the following actions will result:

- The highest scoring application of the overlapping set will be selected.
- All other overlapping applications will be “separated” into a new group of single-SPA applications for any separable SPAs designated, and with any SPAs not designated as separable removed from consideration for award to the given applicant.

The new set of single-SPA applications resulting from this step then will be re-scored based only upon the characteristics of the single SPA and returned to the set of remaining applications to be resolved for overlap and de-confliction according to the remaining standard Round 2 process.

Applicants should recognize in their application plans that this re-scoring of “separated” SPAs on a single-SPA application basis could substantially impact point totals available from secondary scoring categories that depend on the volume of BSLs in a parish and/or the number of ED-SPAs or CRN-SPAs in an application.

WHAT HAPPENS TO SPAS THAT ARE NOT DESIGNATED AS “SEPARABLE” IF AN APPLICATION LOSES TO A HIGHER-SCORING COMPETITIVE APPLICATION?

They are removed from Round 2 consideration for award to the given applicant via that application.

IS THERE ANY OPPORTUNITY FOR AN APPLICANT TO DEMONSTRATE (AS PART OF AN ORIGINAL ROUND 1 APPLICATION) TO CONNECTLA THAT A SPECIFIC LOCATION OR SUBSET OF LOCATIONS WITHIN AN SPA IS DISPROPORTIONATELY COSTLY (SUCH THAT IT WOULD UNDULY BURDEN THE REQUIRED BEAD OUTLAY SHOULD BE REACHED BY AN ALTERNATIVE TECHNOLOGY)?

During Round 1 and Round 2, all eligible BSLs in any included SPAs must be included in the applicant's deployment obligation using its selected technology for the entire SPA. Adjustments for particularly costly BSLs may be made during the EHCT phase after Round 2, if necessary, as provided in [IPv2](#) sections 2.4.9 and 2.4.10.

THE POSSIBILITY THAT CONNECTLA COULD REMOVE UP TO 20% OF THE LOCATIONS FROM AN APPLICATION SEEMS LIKE A DIFFICULT ISSUE FOR APPLICANTS TO PLAN FOR BECAUSE IT COULD MATERIALLY CHANGE THE SCOPE OF A PROJECT. DOES CONNECTLA EXPECT TO TAKE THAT STEP FOR MANY APPLICATIONS?

No. The 20% removal is included only as a "last ditch" tool to maximize coverage of eligible BSLs if slightly overlapping applications cannot be de-conflicted using any of the other steps included in GUMBO 2.0. As stated in IPv2 section 2.4.6: "in order to advance the BEAD priority goal of ensuring service to 100% of eligible locations, in the event that two otherwise selectable applications pose a small amount of overlap that cannot be resolved via the stated "separability" preferences of the applicants, the state will de-scope one or both of the applications only to the amount necessary to award both applications." (emphasis added).

[IPv2](#) ALSO PERMITS CONNECTLA TO REMOVE CAIS OR UNDERSERVED LOCATIONS FROM A FINAL GRANT AWARD ON A UNILATERAL BASIS. COULD YOU EXPLAIN THE JUSTIFICATION FOR THIS REQUIREMENT?

This requirement exists to comply with the federal BEAD statutory requirement that, in the event not all eligible locations can be funded, states must ensure that all unserved locations are funded before underserved and CAIs, and that locations with higher socio-economic need are prioritized within these categories if not all are fundable within the allocation available. Applicants must certify and acknowledge the ability of ConnectLA to implement this federal requirement in the event insufficient funds are available for coverage of all eligible BSLs.

Extremely High-Cost Location Threshold (EHCT)

ARE THERE CIRCUMSTANCES IN WHICH AN INITIALLY SELECTED FTTH APPLICATION AFTER ROUND 2 COULD BE DESELECTED IN FAVOR OF A NON-FTTH APPLICATION BASED ON THE APPLICATION OF THE EHCT?

Any initially selected FTTH application that is determined to exceed the states' EHCT level will first have an opportunity to adjust its funding request, including via the use of alternative lower-cost technologies for certain locations, in order to come within the EHCT level. Only if the initially selected applicant is

unable to so reduce its funding request would alternative applications, including non-FTTH applications, be considered for alternative selection in a given area.

HOW WILL CONNECTLA WORK WITH INITIALLY SELECTED APPLICATIONS TO MAKE ADJUSTMENTS IN ORDER TO ENSURE THAT TOTAL REQUESTED FUNDING IS BELOW THE EHCT? For example, is there a mechanism to do this on a more granular, per-location basis such that an entire SPA does not fall to non-FTTH if only a few, isolated locations are responsible for the increase in cost?

Yes. [IPv2](#) section 2.4.10 provides that if an initially selected FTTH application is above the EHCT, “to reduce requested funds, the applicant will be permitted to shift certain costly locations from FTTH to an alternative lower-cost Reliable broadband technology, or to remove those locations from its application if an alternative lower-cost Reliable application is available for all such locations.”

Joint Applications and Consortiums

ARE JOINT OR CONSORTIUM APPLICATIONS INVOLVING MULTIPLE PARTIES APPLYING AS A SINGLE ENTITY PERMITTED IN GUMBO 2.0?

Yes; however, given the BEAD requirement that state subgrant plans ensure fairness, openness, and competitiveness in the award of subgrants, including compliance with Louisiana’s BEAD program Anti-Collusion and Prohibited Communication Certification, any party that participates in a joint or consortium application entity **may join only one such entity and may not separately apply on an individual basis.**

WHAT SHOULD PROSPECTIVE APPLICANTS KEEP IN MIND IF THEY ARE CONSIDERING JOINING A CONSORTIUM TO APPLY FOR BEAD FUNDS IN LOUISIANA?

Several things. First, a given party may only have an interest in a single BEAD applicant entity; in other words, if a party joins a joint or consortium entity, that will be the only way it is permitted to participate in the GUMBO 2.0 process. In other words, it is not permitted to participate in more than one joint entity nor to participate both in a joint entity and as an individual entity.

Second, each joint or consortium entity must submit details of the underlying agreement(s) amongst its members in order for ConnectLA to determine whether the entity meets the required Pre-Qualification requirements of the BEAD program. For example, the BEAD NOFO provides “that subgrantees may be able to, or required, to demonstrate their capabilities in a variety of manners. A newly established special purpose vehicle established by a consortium of entities may point to the capabilities and experience of those entities in support of its application.” NOFO IV.D.

For these reasons, at the Pre-Qualification stage any joint or consortium applicant must include as part of its Ownership submission sufficient information about the underlying agreement(s) amongst the parties for ConnectLA to evaluate whether the entity as a whole meets required qualifications.

THE SCORING BONUS ASSOCIATED WITH CRITICAL RESILIENCY NEED COMMITMENTS REQUIRES DEPLOYMENT OF BOTH FIXED BROADBAND AND MOBILE BROADBAND INFRASTRUCTURE. CAN A MOBILE PROVIDER THAT DOES NOT CURRENTLY PROVIDE FIBER INFRASTRUCTURE IN LOUISIANA WORK WITH A FIBER PROVIDER SUCH THAT THE MOBILE PROVIDER HANDLES THE MOBILE SIDE, AND THE OTHER COMPANY HANDLES THE FIBER SIDE?

Yes. This could be accomplished via a joint application, as part of a broader consortium application, or via a contractual commitment from one of the providers to the other. For example, NTIA notes that “[a] prospective subgrantee that has significant experience deploying broadband networks but no experience operating them may be able to demonstrate operational capability by entering a binding contract with another entity with such experience.” NOFO IV.D.

Low-Cost Service Option

IPV2 PERMITS APPLICANTS AND SUBGRANTEES TO REQUEST “A MODIFICATION TO THEIR LOW-COST SERVICE OPTION FROM THE \$30 TARGET EFFECTIVE RATE” BASED ON EVIDENCE THAT THE TARGET RATE WOULD BE “FINANCIALLY UNSUSTAINABLE” IN A GIVEN SERVICE AREA. WHAT EVIDENCE MUST BE PROVIDED WITH SUCH A REQUEST?

For example, does submission of a provider's current low-cost offering count as sufficient to demonstrate that the \$30 low-cost rate is unsustainable?

Supporting evidence for modification requests must fall into one of the categories listed in [IPv2](#) section 2.12: “[p]er-subscriber costs in an area indicating that the target effective rate above would be financially unsustainable; and/or [t]he impact on average revenue per user (ARPU) and total project revenue of the target effective rate above would be financially unsustainable given actual or projected subscriber adoption patterns.” Only modification requests providing evidence in at least one of these categories will be considered for approval.

Other Obligations of Subgrantees

WHEN DO ANTI-COLLUSION RESTRICTIONS ON COMMUNICATIONS BETWEEN APPLICANTS KICK IN?

As provided in the Louisiana Broadband Equity Access and Deployment Subgrant Program (GUMBO 2.0) Anti-Collusion and Prohibited Communication Certification, the "quiet period" begins on July 31, 2024.

WHAT ARE GUMBO 2.0'S REQUIREMENTS WITH RESPECT TO ACCESS TO CONDUIT, INCLUDING IN PUBLIC RIGHTS OF WAY?

The BEAD NOFO establishes the following requirement for conduit access points: “[a]ny Funded Network deployment project that involves laying fiber-optic cables or conduit underground or along a roadway must include interspersed conduit access points at regular and short intervals for interconnection by unaffiliated entities. Where a project proposes to lay conduit, Eligible Entities shall require prospective subgrantees to propose to deploy a reasonable amount of excess conduit capacity and to propose a conduit access point interval as part of the grant application process and shall consider the adequacy of the prospective subgrantee’s proposed excess conduit capacity and access points when evaluating the application.” NOFO IV.C.2.b.ii.

[IPv2](#) section 2.10.1.A provides that in order to promote the use of existing infrastructure, with respect to public rights of way the Louisiana Department of Transportation and Development (DOTD) “will allow only one conduit or single-multi-strand fiber optic cable per location in its right-of-way, depending on width availability. The conduit or cable will be expected to be large enough to facilitate multiple providers. The company installing the conduit will be required to allow competitors access, ensuring future growth and competition.”

IS THE REQUIREMENT THAT FOR "ANY NON-BURIED FIBER INFRASTRUCTURE, ANY SUBGRANT APPLICATION PROPOSING THE DEPLOYMENT OF NEW POLES IN SUPPORT OF AERIAL PLANT [TO] INCLUDE STEEL POLES AND INCLUDE ACCESS TO BACKUP POWER" A FREESTANDING REQUIREMENT OR IS IT PART OF SCORING?

It is a freestanding requirement of all BEAD subgrants.

IS THE REQUIREMENT TO PROVIDE 100% BURIED PLANT TO CAIS A FREESTANDING REQUIREMENT OR IS PART OF SCORING?

It is a freestanding requirement of all BEAD subgrants.

IS 90% BURIED FIBER A FREESTANDING REQUIREMENT OR IS PART OF SCORING?

It is an optional scoring element but is not required.

Requirements Prior to Grant Agreement Execution

WHEN WILL GRANT AGREEMENTS FOR SELECTED SUBGRANT APPLICATION BE EXECUTED?

Final grant agreements will be awarded after NTIA approval of Louisiana’s Final Proposal. Although the timeline required for NTIA’s review and approval is unknown, selected applicants should anticipate a delay of at least several months between notification of preliminary award by ConnectLA and final grant agreement execution.

WHEN ARE LETTER OF CREDIT COMMITMENT LETTERS, BANKRUPTCY OPINION LETTERS, AND FINAL LETTER OF CREDIT ISSUANCE REQUIRED?

Letter of Credit commitment letters are required during the submission of additional materials in support of initial award selection. Final Letter of Credit and bankruptcy opinion letters are required as a condition of final subgrant agreement issuance. All Letter of Credit materials must comply with the requirements of [IPv2](#) section 2.4.11, including financial commitment levels consistent with an awardee's total BEAD funding award and the available compliance options listed in NTIA's Limited Waiver to the BEAD Letter of Credit requirement.

Challenge Process

WHAT WAS THE PURPOSE OF COMPLETING A CHALLENGE PROCESS? WILL COMPANIES CHALLENGE WHEN AWARDS ARE ANNOUNCED?

As required by statute, the initial eligibility determinations for funding eligibility under the Broadband Equity Access and Deployment (BEAD) program are based on the Federal Communication Commission's (FCC) National Broadband Map.

The BEAD State Challenge Process was designed to provide stakeholders in Louisiana with an opportunity to dispute the data from the National Broadband Map and challenge the eligibility of locations, based on the process approved by the National Telecommunications and Information Administration (NTIA).

This challenge process was designed to take earlier in the process to ensure that the application and award process is based on the most accurate and up-to-date data available.

WHO WAS ELIGIBLE TO CHALLENGE THE MAP?

Under the BEAD program, the NTIA defined "Permissible Challengers" as broadband service providers, units of local governments, units of tribal governments, and non-profit organizations. Only these entity types were eligible to submit challenges, although they were allowed to submit data collected from residents.

WHAT VERSION OF THE MAP WAS USED?

ConnectLA conducted the BEAD Challenge Process using the August 29, 2023, update of the FCC Broadband Availability Map, which is based on Version 2 of the FCC Broadband Serviceable Locations Fabric. Following the challenge process, ConnectLA migrated the challenge results to Version 3 of the Fabric and updated the locations with the February 20, 2024, update of the FCC Broadband Availability Map.

HOW WERE CHALLENGES SUBMITTED AND ADJUDICATED?

Challenges and rebuttals were submitted by Internet Service Providers, Non-profits, and units of local governments. These challenges and rebuttals were adjudicated by Connect Louisiana.

WHO ADJUDICATED THE MAP?

ConnectLA thoroughly reviewed each challenge and rebuttal that was submitted and made a decision to reject or sustain each challenge using the best available evidence.

WHAT HAPPENS IF I AM NOT LISTED? WILL I EVER GET INTERNET?

ConnectLA is required to use the locations provided in the FCC Fabric as the authoritative dataset for the pool of possible eligible locations. If your location is not listed, please reach out to ConnectLA to discuss how your location can get added to the map through the FCC challenge process.

WHAT HAPPENS IF MY DOT IS CONSIDERED SERVED WHEN I KNOW IT IS NOT SERVED BASED ON SPEED TEST?

Now that the challenge process is completed, the list of locations has been finalized pending NTIA approval. The BEAD funding is required to be distributed based on this final list of locations.

WERE SPEED TESTS USED? WHAT HAPPENED TO THAT SPEED TEST YOU WANTED ME TO USE?

No, speed tests were not accepted in the BEAD challenge process to dispute the download or upload speeds of Internet service. However, data on the latency from performance tests were allowed in the BEAD challenge process.

WHAT HAPPENS IF THE INFORMATION PROVIDED IS INCORRECT?

Now that the challenge process is completed, the list of locations has been finalized pending NTIA approval. The BEAD funding is required to be distributed based on this final list of locations.

WHO IS THE BEST CONTACT TO GET IN TOUCH WITH IF I HAVE A QUESTION ON THE MAP?

Please submit all questions to Connect@la.gov.

WHY ARE THERE LOCATION ID IN THE LIST OF ELIGIBLE LOCATIONS THAT ARE NOT IN THE LATEST VERSION OF THE FABRIC?

The LA BEAD eligible list of locations is based on v3.2 of the NTIA release. Location changes made after that release will not be included in the BEAD eligible list.

Version history

FAQ version	Release date
1.0	March 14, 2024
2.0	April 17, 2024
3.0	May 16, 2024
4.0	June 3, 2024
5.0	June 14, 2024
6.0	July 1, 2024