



# 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.

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

**Helpful Links:**

[IPV2](#)

[Anti-Collusion Certification](#)

[Supplemental Notice](#)



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

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- 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.
<b>Grand Total</b>	<b>3,010</b>				

### 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 on 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.

### AT WHAT POINT IN THE APPLICATION PROCESS MUST A CRN COMMITMENT BE SELECTED?

Applicants making a CRN commitment as a component of a GUMBO 2.0 application must do so during the round the application is originally submitted. For example, a Round 1 application that is unawarded and automatically carried forward to Round 2 cannot change its CRN commitment status in Round 2; in other words, if CRN commitment status is desired for such an application, the CRN selection must be made in Round 1 and cannot be added to the application in Round 2. Similarly, new Round 2 applications (such as is permitted for SPAs not receiving any bids in Round 1) may select CRN commitment status during Round 2.

### 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.

### **IS THE ADMIN USER THE SAME AS THE AUTHORIZED ORGANIZATION REPRESENTATIVE (AOR) FROM THE ORIGINAL PREQUALIFICATION APPLICATION?**

Yes. The user granted administrative privileges in the Application Bidding Platform will be the same AOR as the prequalification application. You may add up to four additional users to your account.

### **WILL ADJUSTMENTS BE MADE TO THE APPLICATION BIDDING PLATFORM BETWEEN THE MOCK OPENING AND OFFICIAL ROUND 1 OPENING?**

No significant adjustments to the Application Bidding Platform are anticipated between the mock opening and official application rounds. The only difference providers can expect is to use new assigned IDs to set up their account and add additional users.

### **WILL OTHER USERS BE ABLE TO SEE THE INFORMATION I AM ENTERING INTO THE APPLICATION BIDDING PLATFORM?**

No. Other users cannot see your information in the Application Bidding Platform. The information in your application is only available to the admin and users that providers assign from their organizations.

### **CAN I DOWNLOAD MY APPLICATION AS A PDF?**

No. You can download it from the system as a CSV file only.

### **DOES THE APPLICATION BIDDING PLATFORM REJECT APPLICATIONS OVER 200% ABOVE THE REFERENCE PRICE?**

Yes. The Application Bidding Platform will not save applications over 200% above the reference price.

### **IS THERE LOGIC IN PLACE TO PREVENT APPLICANTS FROM SUBMITTING THE APPLICATION FOR APPROVAL IF NO SPA IS SELECTED?**

Yes. The Application Bidding Platform will not allow submission of applications with no SPAs selected.

### **CAN APPLICANTS “STACK” SPAS IN AN APPLICATION?**

Yes, an applicant can have multiple SPAs and multiple applications. The funding amount applies to all SPAs associated with each application.

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

### **WHAT DO THE COLORS ON THE SPA MAP REPRESENT?**

Each color represents a different SPA.

### **HOW CAN SPA SELECTION INCLUDE TWO COMPLETE PARISHES?**

Using the multi-SPA selection tool, first select the parish, then highlight all of the SPAs and add to the selected SPA list. Repeat the process with each additional parish you want to add.

### **IS THERE A WAY TO REVIEW THE LIST OF SPAS SELECTED ON THE MAP TO ENSURE THE LIST MATCHES THE SPAS I WANT TO INCLUDE IN MY APPLICATION?**

Yes. Select: Actions > Map, which lets you see all the SPAs you've selected.

### **CAN THE SUMMARY REPORT BE SAVED AND DOWNLOADED AS A PDF?**

No. The summary report cannot be saved as a PDF, but in the next set of options in that section of the Application Bidding Platform, you can export the SPA details and location IDs within those SPAs as a csv. We want to ensure that you have that list to ultimately know your commitment. However, the location ID export does not include geocoordinates, only location IDs.

### **HOW CAN I VIEW THE SPAS ASSOCIATED WITH AN APPLICATION?**

Under “edit,” you can view SPA selections at the top. Once providers have selected SPAs, each application has a SPA summary at the top of the application.

### **IS THERE AN OPTION TO RESUBMIT AN APPLICATION IF IT HAS BEEN RETRACTED?**

No. An application cannot be deleted from the Application Bidding Platform, so it would have to be recreated or copied. However, if you make a mistake, you can copy and edit your application, and then resubmit it for approval.

### **THE ADMIN CAN CREATE AN APPLICATION, BUT CAN OTHER USERS EDIT IT?**

Any user can create/view applications. Any user can edit an “in-progress” application, but only the admin can approve and submit applications. When an application round ends, access to the application is turned off to all users. The banner at the top of the page indicates the date and time the round closes, and applications are no longer accessible after that time. We recommend downloading your applications to ensure you have everything that you've submitted for your records.

### **IF AN APPLICANT IS IN A CONSORTIUM AGREEMENT WITH MULTIPLE COMPANIES, IS ACCESS TO THE APPLICATION BIDDING PLATFORM STILL LIMITED TO FIVE USERS?**

Each Application Bidding Platform account is limited to five users, even if an application involves a consortium of companies.

Inactive users do not count toward the limit, but you can still view people as creators of an application even if they've been deactivated. You may send invites to consultants, but you are still limited to only four users and one AOR per applicant.

### **CAN A DOCUMENT BE MADE INACTIVE TO PREVENT ACCIDENTAL SELECTION OF AN OLDER VERSION?**

No. Once a file is uploaded, it can be added to any application. It is the responsibility of applicants to ensure the correct file is selected.

### **IF AN APPLICATION HAS MULTIPLE USERS, HOW DOES THE APPLICATION BIDDING PLATFORM SAVE THE LATEST VERSION WHILE TWO USERS HAVE AN APPLICATION OPEN?**

Applications in the Application Bidding Platform allow for single user access only. When an application is being edited, it will turn blue, and a lock will appear for that user. The user must unlock it in order to allow another user to edit it. A locked application can still be copied. Users can contact the support desk/submit tickets regarding issues related to locked applications.

### **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.

### **IN APPLICATION ROUND 2, HOW DOES SCORING FACTOR INTO THE COMPLETION PROCESS?**

The same scoring criteria will be used in Round 2 as in Round 1, but the deconfliction process will look at the highest scoring application. Any applications that overlap with the awarded application will be removed. If there are any separable SPAs, they will be created.

### **IF AN APPLICANT’S EXISTING APPLICATION IS CARRIED FORWARD FROM ROUND 1 INTO ROUND 2, CAN THAT APPLICANT ALSO CREATE AND SUBMIT AN ENTIRELY NEW APPLICATION?**

Yes, applicants are allowed to create new applications in Round 2. These applications can include no-bid SPAs (SPAs that no applicant included on a Round 1 application) as well as any unawarded SPAs from that applicant’s deemed withdrawn applications. Note that applicants cannot retract or delete any application that is carried forward in Round 2. However, applicants can change or edit these applications with the constraints outlines in IPv2. For example, the funding request can be decreased, the applicant can add unawarded SPAs to their application and they can make SPAs separable. The system will not allow users to add a SPA that has already been awarded.

### **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 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.

### **IF THE STATE ALLOWS A CHANGE IN REFERENCE FUNDING BETWEEN ROUNDS 1 AND 2, WILL FURTHER INFORMATION BE PROVIDED ABOUT THOSE CHANGES IN REFERENCE PRICES WHEN ROUND 2 OPENS?**

This will be determined soon.

### **IS THERE A FIXED TIMELINE BETWEEN ROUNDS 1 AND 2?**

While we cannot provide an exact timeline yet, there will be a few weeks open between rounds.

## 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.

### HOW DO YOU PREVENT CONFLICTING SEPARABILITIES FOR THE SAME SPA ON TWO APPLICATIONS?

Marking a SPA as separable does not remove the SPA from an application.

Establishing a SPA as separable indicates that the applicant is willing to accept an award for this SPA individually. The separable SPA application is only considered if the overall application is deconflicted from consideration based on an award. At that point, assuming the separable SPA was not awarded, the separable SPA application would be created.

If an applicant includes a SPA on two applications in Round 2, and then identifies that SPA as separable on both applications, and both overall applications conflict with an awarded application, then the system will consider both separable SPA applications. The selection process would be the same as all applications, based on priority projects and scores.

### **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.**

Additionally, entities comprising more than a single party (i.e., multi-entity partnerships and consortia) must describe their organizational structure and the roles and relationships of the participants in the application and may point to the capabilities and experience of the participating entities in support of the application.

#### 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.

## Challenge Process

FOR FAQs ASSOCIATED WITH CHALLENGE PROCESS, PLEASE SEE BEAD CHALLENGE FAQs SECTION OF OUR WEBSITE [HERE](#).

### Subgrant Agreements for Successful Applicants

#### WHEN WILL CONNECTLA PROVIDE DRAFT GUMBO 2.0 SUBGRANT AGREEMENTS FOR REVIEW BY APPLICANTS?

Applicants should expect draft subgrant agreement language prior to the opening of Round 1.

#### WHAT SHOULD APPLICANTS LOOK FOR IN THE DRAFT GUMBO 2.0 SUBGRANT AGREEMENTS? FOR EXAMPLE, WHAT UPDATES OR CHANGES FROM GUMBO 1.0?

Applicants should review the draft GUMBO 2.0 subgrant agreement carefully, as there are material differences between the draft GUMBO 2.0 subgrant agreement and GUMBO 1.0 agreements. These differences reflect the different federal statutes authorizing the grant programs, the BEAD Program's more detailed rules, and lessons learned from GUMBO 1.0, and include:

- Incorporation by reference of Department of Commerce Federal Financial Assistance Standard Terms and Conditions;
- Language implanting Louisiana's decision to utilize fixed amount subawards (see separate FAQ below); and
- Expanded reporting requirements.

#### HOW WILL CONNECTLA STRUCTURE SUBRECIPIENT AGREEMENTS FOR AWARDS MADE TO MULTI-ENTITY PARTNERSHIPS AND CONSORTIA?

ConnectLA will structure awards to multi-entity partnerships and consortia in a manner that best serves the goals and interests of the program. ConnectLA may, at its discretion, enter into subrecipient agreements with the individual entities in a multi-entity partnership or consortia, while in others it will require the multi-entity partnership or consortia to identify a lead subrecipient. ConnectLA will consider, among other things, the organizational structure of the winning bidder, the roles and responsibilities each constituent entity is to play in connection with the award and their individual qualifications and capabilities, and any administrative efficiencies that may be realized. Regardless of how ConnectLA chooses to structure an award, all subrecipient agreements will comply fully with the requirements of the BEAD program.

#### WHEN WILL GUMBO 2.0 AWARDS BE FINAL?

NTIA must review and approve all Gumbo 2.0 awards as part of Louisiana's BEAD Program "Final Proposal." ConnectLA will finalize Gumbo 2.0 awards as soon as possible after NTIA's approval.

#### WHAT SHOULD PROVISIONAL AWARDEES EXPECT TO PROVIDE CONNECTLA IN SUPPORT OF THE FINAL PROPOSAL TO NTIA?

ConnectLA may request additional information from provisional awardees in support of Louisiana's Final Proposal. ConnectLA may, for example, require the submission of additional information regarding the project-specific qualifications of the provisional awardee, such as the specific technical and operational capabilities that will enable the provisional awardee to deliver a local CRN commitment.



### 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.

### HOW WILL MATCH WORK IN GUMBO 2.0?

ConnectLA will evaluate match by comparing the proposed budget for a subgrant agreement to the amount of BEAD funds awarded, and in a manner consistent with the federal Uniform Guidance,<sup>1</sup> the BEAD NOFO,<sup>2</sup> and any further guidance provided by NTIA.

### WHEN DOES AN APPLICANT NEED TO PROVIDE A FULL PROPOSED BUDGET FOR ELIGIBLE EXPENSES?

At the conclusion of the main subgrantee selection process, provisionally selected applications will be required to provide full proposed budgets to achieve the deployment commitments for all included SPAs. At that time, applicants should develop full budgets based on the guidance in this Supplemental Notice, the BEAD NOFO, Initial Proposal volume 2, 2 CFR part 200 (as modified by the UGPN), and all other applicable law. ConnectLA will review proposed budgets may request adjustments or amendments before incorporating each proposed budget into final subgrant agreements for submission as part of the state's Final Proposal.

## Fixed Amount Subawards

### WILL LOUISIANA ISSUE FIXED AMOUNT SUBAWARDS FOR GUMBO 2.0 BROADBAND INFRASTRUCTURE PROJECTS?

Yes. See [Supplemental Notice V2.0](#) for additional information.

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<sup>1</sup> See 2 CFR § 200.306.

<sup>2</sup> See BEAD NOFO at 20-22, § III.B.

### GUMBO 2.0 Disbursements

#### WHAT EXPENSES ARE ELIGIBLE FOR REIMBURSEMENT UNDER A GUMBO 2.0 SUBGRANT?

See [Supplemental Notice V2.0](#) for additional information.

#### WHAT ARE THE MILESTONES FOR GUMBO 2.0 FUNDING DISBURSEMENT?

See [Supplemental Notice V2.0](#) for additional information.

#### WHAT INFORMATION WILL BE REQUIRED FROM SUBGRANTEES WHEN THEY REQUEST DISBURSEMENT AT A GIVEN MILESTONE?

As stated in the UGPN, Louisiana’s “authority to issue fixed amount subawards is conditioned upon a requirement that [Louisiana] monitors the reasonableness of the subrecipient costs.”<sup>3</sup> As such, subgrantees will be required to submit in conjunction with any request for reimbursement:

1. Certification that qualifying broadband is available at the relevant percentage of locations; and
2. One of the following:
  - a. A report showing project expenses using Generally Accepted Accounting Principles or other standard accounting practices; or
  - b. A report showing the relative proportion of costs across the following key spending areas:
    - professional services (e.g., engineering, environmental and historic preservation permitting, legal expenses, etc.);
    - construction services (e.g., digging trenches, erecting towers, blowing fiber, constructing and improving buildings, etc.);
    - outside plant, towers, and poles (e.g., fiber plan, conduit, towers, poles, emergency power generational equipment, etc.);
    - network and access equipment (e.g., broadband routing equipment, broadband transport equipment, network broadband access equipment, wireless base stations, antennas, etc.);
    - operating equipment (e.g., office furniture and fixtures, work equipment and vehicles, etc.);
    - customer premise equipment;
    - contingency funds; and
    - all other expenses; or
  - c. A report demonstrating that the project’s projected cost per location reached is consistent with the project budget.

#### WHAT ARE THE AUDIT REQUIREMENTS ASSOCIATED WITH GUMBO 2.0?

ConnectLA, NTIA, DOC, or another authorized Federal agency may conduct audits at any time. Non-federal entities are required to submit single audits or program-specific audits to the Federal Audit

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<sup>3</sup> See UGPN at 6.

## Louisiana GUMBO 2.0 FAQs

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Clearinghouse,<sup>4</sup> while commercial entities will be required to maintain records sufficient to support ConnectLA's audit obligations under Federal rules.<sup>5</sup>

### 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
7.0	July 29, 2024

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<sup>4</sup> See 2 CFR § 200.501(a).

<sup>5</sup> See 2 CFR §§ 200.501(h); 200.332.