

**NOTE: This document is intended solely to assist Applicants in better understanding the Broadband Equity, Access, and Deployment (BEAD) Program and the requirements set forth in the Infrastructure Investment and Jobs Act, Notice of Funding Opportunity (NOFO), as modified by the BEAD Restructuring Policy Notice (RPN). This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the terms and conditions of the award, or the specific application requirements set forth in the NOFO not modified by the RPN. In all cases, statutory and regulatory mandates, the terms and conditions of the award, and follow-on policies and guidance, shall prevail over any inconsistencies contained in this document.**

**Please review the questions and answers carefully as the release of the RPN has impacted previously published answers. Versions of the BEAD Frequently Asked Questions and Answers published prior to the release of the RPN are no longer valid.**

Category	Question	ORS Response
General BEAD Question	What is the timeline for the BEAD main application? Will it be made available on the webpage: <a href="https://ors.sc.gov/broadband/office/investments/state/bead">https://ors.sc.gov/broadband/office/investments/state/bead</a>	Confirmed. Application templates and Guidelines are published on the SC BEAD page available at: <a href="https://ors.sc.gov/broadband/office/investments/state/bead">https://ors.sc.gov/broadband/office/investments/state/bead</a>
General BEAD Question	What will the process be post award if we discover awarded BSLs without power or that aren't BSLs during construction? Will ISPs have an avenue to amend their award with supporting evidence?	Yes, if a grantee discovers an awarded location is not a BSL there will be a method for the location to be removed from the grant agreement. Details of this process will be discussed with applicants post award in accordance with NTIA guidance.
General BEAD Question	If multiple providers provide for BSLs on the same street, is there a chance two providers could receive awards to serve different BSLs on the same street?	Yes, multiple providers could win different locations on the same street.
General BEAD Question	If an awarded CAI location that has access to coax today has indicated they don't want or need service from the awarded ISP, will the ISP still be obligated to build to them.	Per the NTIA restructuring policy notice, the Grantee will be obligated to serve the location within 10 business days of a request with no charges or delays attributable to the extension of the network of the provider
General BEAD Question	When will the grant reimbursement distribution begin?	<del>Grantees will be reimbursed per project area once it is fully closed out. Each grant agreement will include one or more project area(s).</del> Grantees will be reimbursed based on the milestone schedule outlined in exhibit D of the grant agreement. There may be further revisions to exhibit D before grant agreements are actually executed.
General BEAD Question	Can you please provide more details or direct us to more information on the 10-year federal interest period? What will awarded ISPs be obligated to during this 10 years, beyond the low cost option?	BEAD Uniform Guidance "[...requires real property and equipment acquired or improved with a subgrant to be held in trust for the beneficiaries of the BEAD program. The Federal interest in all real property or equipment acquired or improved as part of a subgrant for which the major purpose is a broadband infrastructure project will continue for 10 years after the year in which the subgrant for a project has been closed out in accordance with 2 CFR 200.344. For example, for all subgrants closed out in 2027, regardless of the month, the Federal Interest Period will last until December 31, 2037." In addition, there will be audit and reporting requirements through the federal interest period. Each applicant should consult with their own legal counsel for advice pertaining to BEAD.
General BEAD Question	Is there a way to designate a group of BSLs as the project for the award so we are not awarded one BSL out the group, making it uneconomical?	<del>Applicants provisionally chosen for a subaward will be given the opportunity to aggregate successfully bid locations into Project Areas. Project Areas will then become the framework for milestone payments.</del> Applicant will be given the opportunity to move forward or withdraw each of the BSLs they are selected for by the SCBBO.

Category	Question	ORS Response
General BEAD Question	<p>If our current low cost offering is \$50 for the first 12 months and \$75 after that, is that allowable under the low cost requirements?</p> <p>If as a company we implemented a price increase across all tiers to accommodate market and economic conditions, including our low cost offering, can that be applied to BEAD customers?</p>	<p>Per the NTIA BEAD FAQs issued on July 11, 2025: "Applicants must offer an LCSO throughout the 10-year federal interest period, or in the case of a LEO subgrant, the 10-year period of performance (see RPN, Appendix C). If an applicant seeks the flexibility to change the cost of the LCSO over time, then it must state the methodology it will use to set the LCSO in the future (e.g., tied to inflation or changes in the FCC's urban rate benchmark, etc.) in its subgrant application." If an applicant is provisionally selected for a subaward they will be given the opportunity to provide this information to the SCBBO during curing.</p>
General BEAD Question	<p>Does a BSL designated as Pending, which has been approved as a BEC, need to be included in the Proposed Served Structures File?</p>	<p>BSLs marked as pending are in the process of being put under an enforceable commitment by the SCBBO, the NTIA requires State Broadband Offices to publish all locations resulting from the BEAD challenge process, (including those BSLs that may fall under an enforceable commitment). Applicants may bid on them under the BEAD program but will not win the bid if the location(s) are added as enforceable commitment using non-BEAD funds.</p>
General BEAD Question	<p>In the South Carolina BEAD program, if you are proposing to serve multiple contiguous DSLs (Designated Service Locations)—and one or more in the middle are denied or awarded to another provider, what happens.</p>	<p>See Appendix C - Application Selection of the Guidelines.</p>
General BEAD Question	<p>Will awarded projects and their associated applications be posted online, and if so, when?</p>	<p>Selected projects will be posted in a table during the final proposal comment period along with an online GIS web map depicting funded locations by selected Applicant, which is currently scheduled for September 19, 2025. Applications will not be posted.</p>

Category	Question	ORS Response
General BEAD Question	Have you received any additional guidance from NTIA on Davis Bacon?	<p>While the ORS cannot provide legal advice, the NTIA provided the following additional guidance:</p> <p><i>"•The Davis-Bacon Act generally applies to Federal contracts and subcontracts. It only applies to Federal grants if specifically mandated by law through a 'Davis-Bacon Related Act.' An example in the Infrastructure Act is the Davis-Bacon Related Act language in Division D, Energy, which states that Davis-Bacon prevailing wage requirements apply to any construction work on a project that receives even partial funding under Division D. <b>There is no parallel Infrastructure Act requirement for BEAD</b>. Given that this was a discretionary labor and employment reporting provision in the NOFO, it was removed by the [Restructuring Policy Notice] RPN (see page 4). Removing it included removing the structure whereby subgrantees for projects over \$5M could provide a Davis-Bacon certification or choose to provide other information.</i></p> <ul style="list-style-type: none"> <li><i>•An Eligible Entity is not required to incorporate Davis-Bacon compliance or reporting into the terms of its subgrant agreements. Eligible Entities may require subgrantees to certify compliance with federal labor and employment law in their subgrant applications</i></li> <li><i>•The BEAD Restructuring Policy Notice (RPN) eliminated extralegal labor, employment, and workforce development requirements imposed in the NOFO and prohibited Eligible Entities from imposing obligations removed by the RPN. Footnote 11 of the RPN states that if an Eligible Entity has its own labor or employment laws that conflict with this removal, the state must ask NTIA for a waiver to apply requirements that the RPN eliminated. The BEAD NOFO did not impose prevailing wage requirements on BEAD projects. Instead, the NOFO gave strong preference to projects with extensive labor and employment commitments and required additional reporting for BEAD projects not subject to prevailing wage laws. The RPN eliminated both of those requirements. Therefore, an Eligible Entity may apply an existing state prevailing wage law without a waiver, so long as it does not reintroduce the preferencing or additional reporting requirements that were eliminated by the RPN. Finally, to stay within federal grant guidelines on reasonable costs and ensure that prevailing wage laws are applied consistently, states applying prevailing wage laws should accurately classify workers in the context of a broadband network deployment and clarify wage and/or worker classifications for potential subgrantees.</i></li> <li><i>•To be clear, <b>Davis-Bacon may impose certain requirements on BEAD grantees and subgrantees that they'd still have to follow, as they would with any federal law.</b> As a matter of application certifications, Eligible Entities may still require subgrantees to certify their compliance with federal labor and employment law, consistent with the statutory requirement that Eligible Entities consider such compliance in awarding broadband deployment subgrants (see 47 USC 1702(h)(1)(A)(iv)(IV)). It's always a good idea to consult with your legal counsel."</i></li> </ul>
GIS Data	Upon reviewing the latest map data, there are still locations that are marked as eligible that we serve. Is there anything that can be done at this point?	The SCBBO encourages the applicant to review Appendix B (Applicant Scoring) in the main application guidelines.
Main Project Application and Guidelines	<p>Will a webinar be held to review the expected changes for the main application requirements?</p> <p>Is there a projected date that the main application will release?</p>	Main Application was released on 7/7/2025. A webinar will be occurring soon and a notification will follow

Category	Question	ORS Response
Main Project Application and Guidelines	<p>Regarding the risk assessment plan, if a company has a POAM (plan of actions and milestones):</p> <p>1) Would the POAM be sufficient?</p> <p>2) If we apply for an area that we do not serve today, do our plans need to be ready for operation upon providing service in that area?</p> <p>3) The requirements still refer to NIST CSF version 1.1. Is this still the case now that version 2.0 has been released? If the POAM is based on 2.0, is that acceptable?</p>	<p>The company POAM may be a sufficient submission for the Cybersecurity and Risk Management plans requirement, as long as it complies with the BEAD NOFO and Main Application Guidelines. We encourage applicants to review the Main Application Guidelines posted on the SCBBO website for more information about the Cybersecurity and Risk Management Plans to ensure that their submissions have all required elements. At the time of BEAD NOFO publication, NIST CSF Version 2.0 was not yet published. Per the Main Application Guidelines "The plan should comply with Version 2.0 or the latest version of the NIST Cybersecurity Framework and include the security and privacy controls required by Executive Order 14028". Additionally, per the BEAD NOFO (Pg. 70), "plans must be ready to be operationalized upon providing service, if the prospective subgrantee is not yet providing service prior to the grant award."</p>
Main Project Application and Guidelines	<p>Does the low cost service option need to be offered to businesses customers as well or only residential customers?</p>	<p>Per the NTIA BEAD Restructuring Policy notice the LCSO needs to be offered to Eligible Subscribers. "Eligible subscribers are defined as any households seeking to subscribe to broadband internet access service that is eligible for the FCC's Lifeline Program."</p>
Main Project Application and Guidelines	<p>Would the lease or purchase of transmission fiber, lit or dark, from an existing provider, with the purposes of delivering broadband under a grant project, qualify as an eligible expense?</p>	<p>Per the BEAD NOFO, "Long-term leases (for terms greater than one year) of facilities required to provide qualifying broadband service, including indefeasible right-of-use (IRU) agreements is an eligible expense." See NOFO, NTIA Guidelines, Guidance and Notices, BEAD Program General Terms and Conditions, and ORS Main Application Guidelines for additional information on eligible/ineligible expenses.</p>
Main Project Application and Guidelines	<p>Would personnel time and consulting fees for the development of cybersecurity and supply chain management plans qualify for pre-award costs?</p>	<p>Contingent upon award, Grantees may be reimbursed as prescribed in section D2 of the guidelines up to \$100,000. Reasonable application preparation fees may include but are not limited to the Cybersecurity Plan and Supply Chain Risk Management Plan. Grantees must account for pre-award costs within their ["ISPname"]_Proposed _Served _Structures.csv file using the BEAD_Funds and Total_Cost columns. See data dictionary for additional details.</p>
Main Project Application and Guidelines	<p>How many individual applications can each ISP submit?</p>	<p>An ISP only needs to submit one application and fully attributed proposed location list. The proposed locations file can not have any duplicated records (Cannot submit multiple bids on the same BSL inside the same CSV file).</p>
Main Project Application and Guidelines	<p>Please confirm that with the new BEAD guidelines, the only requirements for the low-cost offering is that it deliver speeds of 100/20 Mbps and latency performance of no more than 100 milliseconds and must be available for 10 years? Does the 10 years apply to the rate or just the speeds?</p>	<p>Per the NTIA BEAD FAQs issued on July 11, 2025: "Applicants must offer an LCSO throughout the 10-year federal interest period, or in the case of a LEO subgrant, the 10-year period of performance (see RPN, Appendix C). If an applicant seeks the flexibility to change the cost of the LCSO over time, then it must state the methodology it will use to set the LCSO in the future (e.g., tied to inflation or changes in the FCC's urban rate benchmark, etc.) in its subgrant application." If an applicant is provisionally selected for a subaward they will be given the opportunity to provide this information to the SCBBO during curing.</p>

Category	Question	ORS Response
Main Project Application and Guidelines	Does the low-cost option have to be in place at the time of the main application or after the close of the main application submission deadline?	The low-cost option must be in place upon completion of the project area.
Main Project Application and Guidelines	Will you be providing a capital investment template? If so, can you provide it prior to provisional awards so we can review and prepare in advance?	Yes
Main Project Application and Guidelines	Can an entity apply for BEAD funding where an affiliate or another company is the owner of the fiber?	SCBBO is awaiting further guidance from NTIA.
Main Project Application and Guidelines	Can an entity apply for BEAD funding with a partner or a "co-awardee" similar to the process allowed by RUS/USDA?	
Main Project Application and Guidelines	All of our affiliates all filled out pre-qualification documents and were approved by ORS. Can you please provide guidance as to if you would like the parent company to be the applicant for BEAD or would you rather have each affiliate be the applicant?	Applicants may apply at the affiliate level or the parent level; whichever entity applies will be the entity with which an agreement is negotiated between the SCBBO and the ISP and will be subject to the 10 year federal interest period.
Main Project Application and Guidelines	If my company can already serve a location at zero cost, how should this be handled in the .csv file? Should BEAD Funds in Column K be marked as zero, and Total Cost in Column L also be marked as zero? How should the end date be handled in this scenario?	The SCBBO encourages the applicant to review Appendix B (Applicant Scoring) in the main application guidelines.
Main Project Application and Guidelines	The AFFIDAVIT OF COMPLETION AND ACCURACY OF BEAD GRANT APPLICATION template appears to contemplate execution by the CEO or CFO.	All applications will require execution of an affidavit of the CEO, CFO or appropriate Corporate Officer with signing authority.  The template has been modified to accommodate more than just the CEO and CFO.
Main Project Application and Guidelines	Please confirm that the certification of any officer of the Applicant is acceptable.	
Main Project Application and Guidelines	Certificate of General Liability Insurance. What are the minimum requirements?	Current insurance documents must be submitted, ORS at its sole discretion may require that insurance coverage be modified if it's determined they're inadequate for the grant and the Applicant is provisionally chosen for a subaward.

Category	Question	ORS Response
Main Project Application and Guidelines	<p>Can the parent company apply for a BEAD application for all affiliates as a joint venture with all affiliate companies? Since they are owned by the same parent company? OR Should each affiliate provide their own stand-alone applications?</p>	<p>Each applicant should provide their own application. If an affiliate or a joint venture is submitting a grant application as the applicant, it should provide its own application and not rely upon a parent entity.</p>
Main Project Application and Guidelines	<p>We understand the main application now requires submission of an excel file with BSLs we propose to serve and cost to serve those and you intend to award on a BSL by BSL basis. There does not appear to be a field in the excel that allows for us to identify the BSL as part of a group that is a priced together for build efficiency. Is it your instruction, then, that we should be pricing each BSL as if it were built as a stand-alone construction project without leveraging any infrastructure that would be shared among nearby BSLs if they were included in the project?</p>	<p>The SCBBO cannot dictate how Applicants should bid on BSLs. The SCBBO encourages the applicant to review Appendix B (Applicant Scoring) in the Main Application guidelines.</p>
Main Project Application and Guidelines	<p>Is there a way to note addresses are dependent upon one another in the BEAD application?  For instance, say we needed to build a long transport fiber to get to a group of 10 BEAD Eligible addresses. If we are costing out price per address, do we need to include the WHOLE transport fiber in the cost of every one of the addresses? I'm afraid if we were to include it on just the one address at the front of the neighborhood, we wouldn't get awarded that address but would get the addresses that are close together with small incremental builds. Alternatively, if we were to portion out the transport fiber cost over all 10 addresses, if we only get awarded 1 or 2 of them, we are now on the hook for the whole transport build but only got 2/10ths of the transport fiber cost covered.  I could see a scenario where multiple providers are awarded individual BSLs in the same area if they aren't treated in groups.</p>	<p>The SCBBO cannot dictate how Applicants should bid on BSLs. The SCBBO encourages the applicant to review Appendix B (Applicant Scoring) in the Main Application guidelines.</p>
Main Project Application and Guidelines	<p>If you have an application that comprises both coax BSLs and fiber BSLs, but the fiber speeds for the low-cost option differ from the coax speeds for the low-cost option, how should this be handled?</p>	<p><del>The only speed requirements set for by the NTIA is that it meets the BEAD minimum requirements of 100/20 with 100 ms (or less), latency.</del>The only speed requirements set forth by the NTIA for the Low-Cost Service Option is that it meets the BEAD minimum requirements of 100/20 with 100 ms (or less), latency.</p>

Category	Question	ORS Response
Main Project Application and Guidelines	When you say cybersecurity plans 'must be ready to be operationalized upon providing service, if the prospective subgrantee is not yet providing service prior to the grant award', is that in reference to providing service in the grant project area, anywhere as an ISP?	If the Applicant currently provides service, the plan must be operationalized regardless of the grant project area for which the ISP applies. See NTIA General Terms and Conditions, item 36: <a href="https://broadbandusa.ntia.gov/funding-programs/policies-waivers/BEAD_IPFR_GTC_April_2024">https://broadbandusa.ntia.gov/funding-programs/policies-waivers/BEAD_IPFR_GTC_April_2024</a>
Main Project Application and Guidelines	The supply chain risk management plan section notes: "For network facilities owned or operated by a third party, the Applicant must obtain cybersecurity information from that network provider."  Is this a requirement for just the BEAD project area or the ISP's entire network?	This requirement is for the Applicant's entire network.
Main Project Application and Guidelines	In regard to your latest FAQ update regarding the federal interest period. You mention: "In addition, there will be audit and reporting requirements through the federal interest period." On page 93 of the original NOFO, Section G Audit Requirements states: "any non-federal entity that expends federal awards of \$750,000 or more in the recipient's fiscal year to conduct a single or program-specific audit in accordance with the requirements set out in the Subpart." Is the audit requirement active as long as the project is ongoing, or is the audit requirement active for a period of 10 years, the federal interest period?	Per the April 2024 General Terms and Conditions for the NTIA BEAD Program Funds, "2 CFR Part 200, Subpart F, adopted by the Department of Commerce through 2 CFR 1327.101, requires any non-Federal entity that expends Federal awards of \$750,000 or more in the Grantee's fiscal year to conduct a single or program-specific audit in accordance with the requirements set out in the Subpart. Additionally, unless otherwise specified in the terms and conditions of the award, entities that are not subject to Subpart F of 2 CFR Part 200 (e.g., commercial entities) that expend \$750,000 or more in grant funds during their fiscal year must submit to the Grants Officer either: (i) a financial related audit of each DOC grant or subgrant in accordance with Generally Accepted Government Auditing Standards; or (ii) a program-specific audit for each grant or subgrant in accordance with the requirements contained in 2 CFR § 200.507. Grantees and its Subgrantees are reminded that NTIA, the Department of Commerce Office of Inspector General, or another authorized Federal agency may conduct an audit of an award at any time." Please also see other BEAD governing documents for additional information on single audit and other audit requirements, including BEAD NOFO Section VII.G. and NTIA Policy Notice titled Tailoring the Application of the Uniform Guidance to the BEAD Program published 12/26/2023. Applicants are encouraged to consult with their CPAs and legal counsel on audit requirements applicable to their specific organizations.
Main Project Application and Guidelines	I think you mentioned in the BEAD Office Hours that ORS was going to continue to try to get addresses off the BEAD map before final BEAD contracts by adding them to other enforceable commitments. If I understood that correctly, what is the mechanism to alert ORS that an ISP can add a BSL to an existing enforceable commitment?	Per the SCBBOs Approved Initial Proposal Correction Letter: "If non-BEAD funds become available, the SCBBO reserves the right to continue to make enforceable commitments up to the submission date of the BEAD Final Proposal. "

Category	Question	ORS Response
Main Project Application and Guidelines	Our cybersecurity risk management and cybersecurity supply chain risk management plans are compiled into a single document. Can we upload this single document with our application, or does it need to be split in to two?	The plans should be two separate documents. Please refer to the main application guidelines for the requirements.
Main Project Application and Guidelines	<p>Joint Venture applications:</p> <p>Should applications for a joint venture be filed in the same directory as those filed for a single applicant? Please provide some clarification on the process and procedures.</p>	Applicants can upload all documents to the same directory as those filed as a single applicant or request an additional directory be created.
Main Project Application and Guidelines	According to the main application guidelines, a completed, signed Professional Engineer Certification Template will be due upon request if the Applicant is provisionally awarded a project for a BSL(s). Does the PE have to be certified in the State of South Carolina?	The Conditional Limited Programmatic Waiver and Clarification of Professional Engineer Certification NTIA issued on March 7, 2024, states as follows: "OICG clarifies that the professional engineer making certifications in connection with the PE Certification Requirement may be licensed in any of the 56 Eligible Entities." ORS is not able to provide legal advice regarding any state law requirements or limitations. ORS does not have jurisdiction regarding professional engineer licensure or certification.
Main Project Application and Guidelines	To reach the 20 broadband serviceable locations (BSLs), we must build 3 miles of transport fiber. The first location (Point 1) will appear to have a higher cost because it must absorb the full transport expense. However, this transport infrastructure serves all 20 locations. If Point 1 is not selected for funding or build-out, the cost of the transport fiber will need to be reallocated to the next selected point, increasing its per-location cost accordingly. In short, excluding the first point doesn't eliminate the transport cost—it simply shifts that cost downstream, which may impact cost-efficiency evaluations across the remaining points. How would we communicate the above scenario in the application	The SCBBO cannot dictate how Applicants should bid on BSLs. The SCBBO encourages the applicant to review Appendix B (Applicant Scoring) in the Main Application guidelines.