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Funding Program Name	Broadband Equity Access and Deployment (BEAD) Program
Funding Request Name	South Carolina-BEAD-Final Proposal-Programmatic
Applying Organization	EXECUTIVE OFFICE OF THE STATE OF SOUTH CAROLINA
Applicant Name	James Stritzinger

1.1 Subgrantee Selection Process

Describe how the Eligible Entity's deployment Subgrantee Selection Process undertaken is consistent with that approved by NTIA in Volume II of the Initial Proposal as modified by the BEAD Restructuring Policy Notice.

South Carolina's BEAD Program is focused on accelerating the deployment of reliable, high-speed broadband infrastructure to facilitate statewide connectivity and close the digital divide. By leveraging data-driven planning, stakeholder collaboration, and targeted support for providers and communities, South Carolina aims to maximize the impact of federal investment and build a cost-efficient, sustainable, future-ready broadband network.

To meet these objectives, the South Carolina Broadband Office (SCBBO), housed within the South Carolina Office of Regulatory Staff (ORS), conducted the BEAD subgrantee selection process in a fair, transparent, and competitive manner to provide high-quality, reliable, and cost-effective broadband service to unserved and underserved areas across the state.

The process followed the methodology outlined in South Carolina's BEAD Initial Proposal Volume II (IPv2 available at: <https://ors.sc.gov/sites/scors/files/Documents/Broadband/BEAD/Intake%20Summary-Volume%202-08-20-2024%2011-30-EXECUTIVE%20OFFICE%20OF%20THE%20STATE%20OF%20SOUTH%20C-GRN-000156.pdf>), as amended by the BEAD Restructuring Policy Notice (RPN available at: <https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf>) on June 6, 2025, and the SC Initial Proposal Modification Letter (IPMOD available at: [https://ors.sc.gov/sites/scors/files/Documents/Broadband/BEAD/SCBBO%20IP%20Mod%20Letter%20\(EXECUTED%202025-06-19\).pdf](https://ors.sc.gov/sites/scors/files/Documents/Broadband/BEAD/SCBBO%20IP%20Mod%20Letter%20(EXECUTED%202025-06-19).pdf)) which was approved by NTIA on June 27, 2025.

Modifications to South Carolina's Initial Proposal Volume II

The IPMOD letter made the following process changes to SC's approved IPv2:

- **Project Area Definition** – The SCBBO changed the project area definition from Zip Code Tabulation Area (ZCTA) to a single BEAD-eligible Broadband Serviceable Location (BSL). By doing so, each BSL was evaluated discretely. Internet Service Providers (ISPs) were able to bid for as many BSLs as they

desired in a single application. Following the selection of preliminary winners for each BSL, project areas were drawn to include all BSLs won by the ISP.

- Subgrantee Selection | Gating – Once project areas were drawn, winning ISPs were gated to obtain all remaining submissions that were required as part of IPv2.
- Subgrantee Selection | Application Publication – Due to time restrictions, the SCBBO did not publish all applications for comment during Subgrantee Selection. However, as required by the BEAD RPN, the SCBBO provided a seven-day public comment period for the draft Final Proposal beginning on September 19, 2025 and ending on September 29, 2025.
- Coverage for Locations with No Proposals – At the conclusion of Subgrantee Selection, the SCBBO negotiated in good faith directly with ISPs to obtain a high-speed broadband solution for BSLs with no proposals .
- Subgrantee Accountability – The SCBBO eliminated the provision in IPv2 that would have reduced the match rate requested from the Subgrantee by 1% for each month the project goes over the project completion date listed in the application.
- Enforceable Commitments – The SCBBO reserved the right to continue to make enforceable commitments up to the submission date of the BEAD Final Proposal with non-BEAD funds.

Subgrantee Selection Process

As approved in IPv2 and the IPMOD letter, the SCBBO conducted the subgrantee selection process in two main phases:

1.Prequalification Phase

To serve as a prerequisite to the Main Subgrantee Application, the SCBBO conducted an initial Prequalification round, which initially closed in early 2025. This round captured relevant gating criteria from prospective subgrantees, including, but not limited to information pertaining to an applicant's:

- Financial capability
- Managerial capability
- Technical capability
- Compliance with applicable laws
- Operational capability
- Ownership
- Other sources of public funding
- Record of past compliance with federal labor and employment laws
- Compliance with cybersecurity and supply chain risk management requirements

At the start of the “Benefit of the Bargain Round,” prospective applicants that did not submit during the Prequalification phase were permitted to do so as part of their Main Application materials.

2.Main Application Phase / “Benefit of the Bargain Round”

In accordance with the BEAD Notice of Funding Opportunity (NOFO), BEAD RPN, and IPv2, the SCBBO structured the Main Application to collect all relevant information from eligible subgrantees for the SCBBO to determine whether the application preliminarily fulfilled requirements set forth by the SC BEAD program and associated grant guidelines.

Since the SCBBO had not yet initiated its Main Application Phase prior to the issuance of the BEAD RPN, the 'Benefit of the Bargain Round' was the initial and primary subgrantee selection round conducted .

Prior to the opening of the Main Application Phase, the SCBBO released its updated SC BEAD Main Application Guidelines (available at: <https://ors.sc.gov/sites/scors/files/Documents/Broadband/BEAD/Main%20Application%20Guidelines%208.19.2025.pdf>) that detailed application timelines and the required certifications, confirmations, attachments, and narrative responses to be submitted by eligible subgrantees.

Applicants submitted the complete application and relevant attachments through upload to the ORS ShareFile site. Additionally, the SCBBO posted a Main Application Attachment Checklist (available at: <https://ors.sc.gov/sites/scors/files/Documents/Broadband/BEAD/Main%20Application%20Checklist.pdf>) to encourage compliance and support eligible applicants in ensuring they provided all of the required documentation necessary for the SCBBO to effectively score prospective subgrantees.

1.Opening Period: The Main Application Phase opened on July 7th, 2025, and closed on July 24th, 2025. Materials submitted in the Main Application included:

- Completed Main Grant Application
- Completed, Signed, and Notarized Main Grant Application Affidavit
- BSL File of Proposed SC BEAD Locations to Serve
- Supply Chain Risk Management Plan
- Cybersecurity Risk Management Plan
- Certificate of Liability Insurance

2.Scoring & Selection: Selected applicants were notified in writing on August 21, 2025. Applicants were given three (3) business days to notify the SCBBO regarding whether they chose to move forward with the BSL(s) for which they were selected to receive. If an applicant declined to move forward, the SCBBO issued the BSL(s) to the runner up . The SCBBO applied the scoring rubric outlined in Requirement 13 of the Final Proposal to select winning applicants.

3.Gating: As approved in the IPMOD letter, applicants who had winning BSLs were required to submit additional information to fulfill all remaining gating criteria not previously provided during the Prequalification or Main Application phases. Supplemental gating attachments included:

- Financial capability attachments
- Business plans
- Audited financial statements
- Evidence of necessary funds to cover all project costs that exceed the amount of the grant
- Resumes for key management personnel
- Other public funding disclosures
- Professional engineer certification
- Network designs and diagrams
- Capital investment schedule
- Project timeline and milestone schedule

The SCBBO opted to conduct the gating process after selecting applicants to reduce administrative burden and ensure equal opportunity for all eligible participants - particularly to promote tech-neutrality within the compressed timeline of the Benefit of the Bargain Round.

Completion Check: The SCBBO conducted a completion check to verify all application fields and associated attachments were submitted as part of their grant application. In the event applications were incomplete, applicants were notified within a specific timeframe in which they were required to provide the missing information back to the SCBBO.

Curing: The SCBBO collaborated with selected applicants to refine their submissions, supporting the submission of complete and compliant applications.

4. Selection of Applicants: Following gating review, completion checks, and application curing, the SCBBO submits its complete list of proposed BEAD awardees to the NTIA. Upon the submittal of South Carolina's Final Proposal, selected applicants will be considered Provisional Subgrantees until such time a grant agreement is executed and notice-to-proceed is issued whereby their designation will officially change to SC BEAD deployment Subgrantees.

1.2 Fair, Open, Competitive Subgrantee Selection

Describe the steps that the Eligible Entity took to ensure a fair, open, and competitive process, including processes in place to ensure training, qualifications, and objectiveness of reviewers.

The SCBBO conducted a fair, open, and competitive Subgrantee Selection Process in accordance with the requirements outlined in the BEAD NOFO, the BEAD RPN, and 47 USC § 1702. The SCBBO followed a structured and transparent approach to grants management by building on best practices and durable workflow processes developed under the State's administration of the ARPA State and Local Fiscal Recovery Fund (SLFRF) and Capital Projects Fund (CPF) programs.

To uphold its commitment to transparency and compliance with all federal and BEAD-specific requirements, the SCBBO developed a comprehensive Program Administration Guide. This guide thoroughly documented the intricacies of administering BEAD funds and included detailed safeguards to ensure that the subgrant award process for last-mile broadband deployment projects was fair, open, and competitive.

Fair Subgrantee Selection

The SCBBO conducted a fair subgrantee selection process that was free from collusion, bias, conflicts of interest, and arbitrary decision-making through taking the following steps:

- **Scoring Criteria:** The SCBBO released the Applicant Scoring Criteria alongside the Main Application guidelines prior to the opening of the Benefit of the Bargain round. In accordance with the BEAD RPN, the scoring rubric prioritized the primary criteria aimed at minimizing the BEAD program's financial outlay. The SCBBO also specified the weighting of the secondary criteria, to be applied when relevant. The criteria outlined in the SCBBO scoring rubric were quantitative in nature which eliminated the potential for bias and arbitrary decision making in the selection and scoring process of grant applications.
- **Public FAQ:** Before, during, and up to the close of the application period, the SCBBO received and responded to questions through an online comment form and maintained a list of official responses through a Frequently Asked Questions (FAQ), which was revised and published on a regular basis through the ORS BEAD webpage. Subgrantees were directed to use the FAQ form to ensure all applicants received the same information simultaneously.
- **Conflicts of Interest:** The SCBBO follows the State's conflict of interest or "Ethics" policy which is consistent with 2 C.F.R. § 200.318(c). The State's conflict of interest policy is referenced as SC Code 8-13-100 et seq (1), available at: <https://www.scstatehouse.gov/code/t08c013.php>.

- **Additional Internal Controls:**

- o The SCBBO has experience in establishing and maintaining internal controls for federal awards in accordance with 2 CFR 200.303, as demonstrated through past federally funded broadband expansion

programs. This internal controls experience will support the BEAD program by facilitating continued compliance with federal regulations and building upon successful past internal controls frameworks.

- oAny/all necessary follow-up with prospective subgrantees whether telephonic, virtual, or in-person occurred with a minimum of two ORS employees present. Email correspondence was sent and or cc'd through BEAD@ors.sc.gov which is monitored by all members of the SCBBO as well as the ORS Finance department.

- oGrant agreements will be sent through an online review chain before final electronic signature, which tracks the lineage of all reviewers and approvers in a separate log file.

- o Access for the upload of required data, grant applications, attestations, and associated documentation were managed through the ORS ShareFile site for secure file transfer. Applicants requested a login through an online form posted on the ORS website. The SCBBO will align with all document record and retention policies as provided and required through the IJA BEAD program.

Open Subgrantee Selection

The SCBBO conducted an open subgrantee selection process that facilitated the participation of a wide variety of potential applicants and prevented favoritism, collusion, and abuse through taking the following steps:

- Eligibility Criteria: The SCBBO welcomed applications from all eligible technologies for South Carolina's BEAD Program. The eligibility criteria for applicants were clearly defined in the SCBBO's Main Application Guidelines, which were published and accessible to all in the public domain on ORS' website prior to the application round. As defined in the BEAD RPN, eligible technologies included fiber-optic, cable modem/hybrid fiber-coaxial, LEO satellite services, and terrestrial fixed wireless using fully licensed, fully unlicensed, or a combination of licensed and unlicensed spectrum. These technologies were also required to meet the technical performance standards outlined in the NOFO, as updated by the RPN and governing statute.

- ULFW Notification: Following the BEAD RPN, the SCBBO notified all newly eligible Unlicensed Fixed Wireless (ULFW) providers via a listserv announcement informing ULFW providers of the requisite seven-day window to inform the office of their intention to submit evidence that BEAD funding is not required for locations they serve. The SCBBO did not receive any notifications from ULFW providers within the seven-day window.

- Public Information: All relevant public-facing information pertaining to South Carolina's BEAD Grant Program is located at the following URL located on the ORS website:
<https://ors.sc.gov/broadband/office/investments/state/bead>.

- Office Hours and Technical Assistance: During the grant application period, the SCBBO hosted numerous rounds of virtual, webinar-style office hours, twice a week for all eligible applicants. These sessions covered key topics including the SC BEAD Main Application Phase, Letters of Credit and Bond Requirements, Location Data Submission, Financial Considerations, and Cybersecurity and Supply Chain Risk Management Plans. PDF versions of the PowerPoint slides are available on the SC BEAD Program Website under the 'Presentation Materials' accordion.

- Transparent Coordination: The SCBBO is committed to transparency of coordination and outreach efforts. Building upon previous broadband grant programs, the SCBBO regularly publicly posts planning documents on its website and hosts public sessions to make sure it is clear how the office is operating to extend funding to connect South Carolina.

- Public Outreach: As part of the GetConnectedSC initiative, the SCBBO obtained feedback during outreach campaigns with the public and ISPs. Findings were published as part of the SCBBO’s BEAD Five-Year Action Plan, (available at: SC BEAD Five-Year Action Plan (FINAL 2023-08-25).pdf), which served as a basis for the creation of the State’s BEAD Initial Proposal (Vol I & II).

- Distribution List: The SCBBO set up a grant notification distribution list that includes over 660 individual contacts that receive correspondence through ConstantContact on timely updates from the office. Updates on the SC BEAD program are distributed through this list, and any entity can sign-up for correspondence at any time.

Competitive Subgrantee Selection

The SCBBO facilitated a competitive subgrantee selection process that used objective evaluation criteria and did not favor one type of provider over another, through taking the following steps:

- Neutral Eligibility Criteria : Eligibility criteria were clearly defined in the Main Application Guidelines, which were published and publicly accessible on ORS’ website. The SCBBO developed clear and objective evaluation criteria for assessing grant applications as detailed in Requirement 13 of the Final Proposal.

- Negotiations: Actual negotiations between the SCBBO and Applicants were minimal due to the robust participation of ISPs. Utilizing GIS data, the SCBBO evaluated Providers with existing facilities or nearby selected locations from SC BEAD Applicants to gauge interest in providing a bid. If the bid was considered excessive or the Applicant declined to bid , the SCBBO coordinated with LEO providers to obtain a bid. As a result, all eligible locations obtained a viable bid.

- Project Deconfliction: This was a non-issue within the SC BEAD Program as the NTIA approved removal of project areas (Zip Code Tabulation Areas), from consideration per the SCBBO IPMOD. The result was that each BSL served as its own “project” and were bid individually.

- SCBBO Staff Training: All ORS employees are required to participate in mandatory ethics training annually.

- Subgrantee Selection Transparency: After locations were selected and Applicants gated, the SCBBO disclosed the results of subgrantee selection by publishing the names of the recipients, the amounts, and associated BSLs that comprise their proposed project. The SCBBO built a GIS-based web application and distributed a press release to promote transparency and accountability as part of the public comment period.

Subgrantee Application Review Process

The SCBBO is committed to ensuring a fair, open and competitive applicant review process. For the review of BEAD applications, the SCBBO established a Grant Application Review Team. All members of the review team were trained, qualified, and acted objectively. Roles and responsibility of the grant review team are outlined below:

- Director of Broadband/Senior Director of Broadband – Signatory, final reviewer, and approver of the Broadband Office on all Grant questions, rankings, and award recommendations.

- Deputy Director of Broadband – Responsible for supporting preliminary review and scoring of applications from programmatic perspective. Supports creation of draft responses from questions provided by ISPs for Senior Management’s review and approval.
- Manager, Finance and Administration – Responsible for supporting preliminary review and scoring of applications from fiscal perspective along with completeness checks of relevant information pertaining to the prospective subgrantee. Supports creation of draft responses from questions provided by ISPs relating to fiscal matters for Senior Management’s review and approval.
- Senior Data Scientist/ Data Scientist – Responsible for supporting preliminary review and scoring of applications from programmatic perspective. Responsible for evaluating projects proposed in relation to minimum requirements set forth in guidance documentation related to the Grant. Ensures data completeness of applicant submission.
- GIS Specialists/Project Managers – Responsible for supporting preliminary review and scoring of applications from programmatic perspective. Responsible for evaluating projects proposed in relation to minimum requirements set forth in guidance documentation.
- Consultants/Contract Support – Responsible for providing subject matter expertise in the evaluation, compliance check, and grant applications reviews to help ensure compliance with the minimum qualifications outlined as gating criteria pertaining to the BEAD program.

Oversight procedures

The SCBBO established oversight procedures to ensure the quality and impartiality of the subgrantee application review process.

- Documentation – The SCBBO ensured that all selection decisions were thoroughly documented in a tracking document.
- Review Oversight – Controls were established such that no single SCBBO employee could review and approve a grant for award. Final decisions on provisional selections for prospective subgrantees were reviewed by multiple staff and departments within ORS.
- Automated Scoring – All applicants submitted their application bid data using a standardized CSV template provided by the SCBBO. The SCBBO was then able to consolidate all application bids and write an automated script that scored every bid according to the scoring criteria outline in Requirement 13. The automated scoring process was run twice by two different data scientists, results were compared to ensure findings were repeatable, which allowed the SCBBO to minimize any potential for bias in the evaluation of bids.
- Conflicts of Interest – As previously mentioned, the SCBBO follows the State’s conflict of interest or Ethics policy which is consistent with 2 C.F.R. § 200.318(c).

1.3 No Applications

Affirm that, when no application was initially received, the Eligible Entity followed a procedure consistent with the process approved in the Initial Proposal.

As stated in the SCBBO IPMOD letter, at the conclusion of Main Application Phase, if no proposals for an eligible location were received, the SCBBO negotiated in good faith directly with ISPs to obtain a high-speed broadband solution. No inducements were offered during the direct negotiation process, or at any other time during the subgrantee application process.

The SCBBO affirms that it followed a procedure consistent with the process approved in its IPv2, as amended by its IPMOD letter.

1.4 CAI Revisions

If applicable, describe the Eligible Entity's methodology for revising its eligible CAI list to conform with Section 4 of the BEAD Restructuring Policy Notice.

The SCBBO was provided a list of CAIs to remove by the NTIA data team. The SCBBO removed those CAIs from any applicant that bid on those locations.

1.5 Records Retention Certification

Certify that the Eligible Entity will retain all subgrantee records in accordance with 2 C.F.R. § 200.334 at all times, including retaining subgrantee records for a period of at least 3 years from the date of submission of the subgrant's final expenditure report. This should include all subgrantee network designs, diagrams, project costs, build-out timelines and milestones for project implementation, and capital investment schedules submitted as a part of the application process.

Yes

12.1 Priority Broadband Project

Describe how the Eligible Entity applied the definition of Priority Project as defined in the Infrastructure Act and the BEAD Restructuring Policy Notice.

South Carolina prioritized BEAD funding for "priority broadband projects" as required by the IIJA. The IIJA defines a priority broadband project as one designed to:

- (i) provide broadband service that meets speed, latency, reliability, consistency in quality of service, and related criteria as the Assistant Secretary shall determine; and
- (ii) ensure that the network built by the project can easily scale speeds over time to-
 - a. meet the evolving connectivity needs of households and businesses; and
 - b. support the deployment of 5G, successor wireless technologies, and other advanced services.

The BEAD RPN further defines the term "Priority Broadband Project" as:

A project that provides broadband service at speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads, has a latency less than or equal to 100 milliseconds, and can easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services.

The SCBBO's Application of the Priority Broadband Project Definition

To support adherence to the NTIA definition of a "Priority Broadband Project," the SCBBO assessed each project area holistically to determine if the proposed technology met the NTIA's priority broadband definition.

To apply the "Priority Broadband Project" definition, the SCBBO evaluated each project area's proposed technology based on applicant narratives and available data. In addition, the SCBBO also evaluated the technology's capacity to reliably and consistently achieve minimum data rates of 100 Mbps download and 20 Mbps upload, concurrently maintaining a latency not exceeding 100

milliseconds. Finally, the SCCBO evaluated the proposed technology's inherent ability to easily scale speeds over time to accommodate the evolving connectivity demands of both residential and business sectors, alongside supporting the deployment of 5G, successor wireless technologies, and other advanced services.

When evaluating proposed technologies, the SCBBO considered a multitude of factors. First, the SCBBO reviewed Ookla speed test data for LEO satellite technology to assess reliable and consistent speeds, latency, and the relationship between subscriber density and throughput; and whether the technology is “easily” scalable. Second, the SCBBO considered South Carolina's forested geographic features hindering signal propagation, limited wireless spectrum available from the FCC, lack of existing tower infrastructure, and the costly, protracted timelines for building or replacing towers to scale. Finally, the SCBBO reviewed historical cost data from previous grant rounds to determine an objective framework by which projects may be considered fiscally excessive for priority designation.

It is important to note that in conducting these evaluations, no single factor determined that a given technology did or did not meet the definition of a “Priority Broadband Project” in South Carolina.

The SCBBO's assessment and application of the “Priority Broadband Definition” led to the strategic, diverse allocation of SC BEAD eligible locations to Fiber/Cable and LEO technologies. This outcome demonstrates a technology-neutral approach designed to achieve the best Benefit of the Bargain for the State of South Carolina.

13.1 Eligible Entity Scoring Criteria

Provide a narrative summary of how the Eligible Entity applied the BEAD Restructuring Policy Notice's scoring criteria to each competitive project application and describe the weight assigned to each Secondary Criteria by the Eligible Entity. Scoring criteria must be applied consistent with the prioritization framework laid out in Section 3.4 of the BEAD Restructuring Policy Notice.

The SCBBO evaluated subgrantee applications according to the following framework as outlined in the BEAD RPN. The SCBBO implemented this scoring rubric to ensure that every BEAD-eligible location in South Carolina gains access to fast, dependable broadband delivered in the most cost-effective way possible.

Primary Criteria – Minimal BEAD Program Outlay:

In deciding among competing applications covering the same BSL(s), the SCBBO chose the BSL(s) with the lowest cost based on minimal BEAD Program outlay. This selection was based on the total BEAD funding required to complete the project (i.e., the total project cost minus the applicant's proposed match) and the cost to the SC BEAD program per location (i.e., the total BEAD funding required to complete the project divided by the number of BSLs the project will serve).

In the case that there was only one applicant for a given BSL(s), that applicant was selected by default, provided the cost of the location was not excessive and the proposed technology met the definition of a Priority Broadband Project as outlined in Requirement 12 of the Final Proposal.

Secondary Criteria – 100 points : If multiple applications were submitted to serve the same BSL(s) and an application's cost was within 15% of the lowest-cost proposal received for the same set of BSL(s), the SCBBO evaluated such competing applications based on the following two secondary criteria:

1.Speed of the Network – 90 Points Total:

As part of the CSV/GIS submission, applicants were required to attribute at the BSL level the Maximum Download Speed in Mbps, Maximum Upload Speed in Mbps, and Latency in milliseconds (ms) for each location that would be serviceable upon completion of the project. The following is a breakdown of the three components for the Speed of the Network scoring:

a. Maximum Download Speed – 60 Points

The applicant with the highest download speed in Mbps received 60 points for the BSL. No additional points were awarded except in the event of tie, with two or more applicants claiming the same download speed, both applicants received 60 points.

b. Maximum Upload Speed – 15 Points

The applicant with the highest upload speed in Mbps received 15 points for the BSL. No additional points were awarded except in the event of tie, with two or more applicants claiming the same upload speed, both applicants received 15 points.

c. Minimum Latency Speed – 15 Points

The applicant with the lowest latency in ms received 15 points for the BSL. No additional points were awarded except in the event of tie, with two or more applicants claiming the same latency speed, both applicants received 15 points.

2. Speed to Deployment – 10 Points

As part of the CSV/GIS submission applicants were required to attribute at the BSL level the number of months needed to fully complete the work. The applicant with the fewest months listed to fully complete service to the given BSL (i.e., from Issuance of a Notice-to-Proceed to the Initiation of Operations), received 10 points. No additional points were awarded except in the event of a tie, with two or more applicants claiming the same number of months, both applicants received 10 points.

Upon completion of secondary criteria review for a set of two or more projects bidding for the same BSL, if a tie remained, the SCBBO awarded the BSL to the Applicant with the smallest amount of BEAD funds requested.

6.1 Certification of Challenge Process

Certify that the Eligible Entity has successfully completed the BEAD Challenge Process and received approval of the results from NTIA.

Yes

6.2 Public Post Website - Challenge Process

Provide a link to the website where the Eligible Entity has publicly posted the final location classifications (unserved/underserved/CAIs) and note the date that it was publicly posted.

NTIA Approved Post-Challenge Data (Posted October 2024)

Website: Broadband Equity, Access, and Deployment (BEAD) Program | Office of Regulatory Staff
(<https://ors.sc.gov/broadband/office/investments/state/bead>)

CSV File: NTIA Approved Post-Challenge Locations.csv

(<https://ors.sc.gov/sites/scors/files/Documents/Broadband/BEAD/NTIA%20Approved%20Post%20Challenge%20Locations.csv>)

This is a list of all BSLs approved by the NTIA for the BEAD program, which included eligible unserved BSLs, underserved BSLs, and unserved/underserved CAIs . This data uses version 3.2 of the Federal Communication Commission's Broadband Availability Map Fabric. This file serves as the approved SC BEAD challenge result and will not be updated to reflect eligibility changes.

7.1 Coverage of Unserved Locations

Certify whether the Eligible Entity will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2).

Yes

7.2 Unserved Locations - Financially Incapable Narrative

If the Eligible Entity does not serve an unserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.

N/A

7.3 Unserved Locations - Financially Incapable Documentation

If applicable to support the Eligible Entity's response to Question 7.2, provide relevant files supporting the Eligible Entity's determination.

7.4 Coverage of Underserved Locations

Certify whether the Eligible Entity will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2).

Yes

7.5 Underserved Locations - Financially Incapable Narrative

If the Eligible Entity does not serve an underserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.

N/A

7.6 Underserved Locations - Financially Incapable Documentation

If applicable to support the Eligible Entity's response to Question 7.5, provide relevant files supporting the Eligible Entity's determination.

7.7 Certification of No BEAD Location Documentation

Certify that the Eligible Entity has utilized the provided reason codes to investigate and account for locations that do not require BEAD funding, that the Eligible Entity will utilize reason codes 1, 2, and 3 for the entire period of performance, and that the Eligible Entity will maintain documentation, following the guidelines provided by NTIA, to justify its determination if there is a reason to not serve any unserved or underserved location on the NTIA-approved final list of eligible locations through a BEAD project. The documentation for each location must be relevant for the specific reason indicated by the Eligible Entity in the fp_no_BEAD_locations.csv file. The Eligible Entity shall provide the documentation for any such location for NTIA review, as requested during Final Proposal review or after the Final Proposal has been approved.

Yes

7.8 Certification of Enforceable Commitments

Certify that the Eligible Entity has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that the Eligible Entity was notified of and did not object to, and/or federally-funded awards for which the Eligible Entity has discretion over where they are spent (e.g., regional commission funding or Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects.

Yes

4.1 Public Waste, Fraud, and Abuse Hotline

Does the Eligible Entity have a public waste, fraud, and abuse hotline, and a plan to publicize the contact information for this hotline?

Yes

4.2.1 Oversight and Accountability - BEAD Program Monitoring Plan

(1) BEAD program monitoring plan;

SC BEAD Program Monitoring Plan-09-29-2025 04-10-EXECUTIVE OFFICE OF THE STATE OF SOUTH C-GRN-000156.pdf

4.2.2 Oversight and Accountability - Agency Documentation

(2) Agency policy documentation which includes the following practices:

- a. Distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize) or on a basis determined by the terms and conditions of a fixed amount subaward agreement; and
- b. Timely subgrantee (to Eligible Entity) reporting mandates.

SC BEAD Agency Policy Documentation-09-29-2025 04-12-EXECUTIVE OFFICE OF THE STATE OF SOUTH C-GRN-000156.pdf

4.3 Subgrant Agreement Certification

Certify that the subgrant agreements will include, at a minimum, the following conditions:

- a. Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;
- b. Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;
- c. Compliance with all relevant obligations in the Eligible Entity's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the Eligible Entity's BEAD award;
- d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;
- e. Subgrantee accountability practices that include the use of clawback provisions between the Eligible Entity and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);
- f. Mandate for subgrantees to publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) and/or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. This includes an acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer; and

g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance is consistently assessed and tracked over time.

Yes

11.1 Implementation Status of Plans - Cost and Barrier Reduction

Provide the implementation status (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment.

Many of the recommendations provided in the SCBBO's IPv2 are beyond the scope and jurisdiction of the SCBBO to engage in a direct capacity and it is the policy of the ORS to maintain impartiality regarding proposing and commenting on any legislation which may support any of the recommendations noted below or otherwise.

1. Streamline State and Federal Permitting Requirements: In Progress – A new provision in SC811 legislation includes enhanced protocols for addressing large-scale projects with ground disturbances.
2. Promote and Adopt a Dig Once Policy for South Carolina: In Progress
3. 811 Dig Locates: In Progress - New SC811 legislation: <https://sc811.com/state-law/>
4. Rail Permitting: In Progress – Railroad Legislation (In Committee): <https://www.scstatehouse.gov/billsearch.php?billnumbers=4057>

11.2 Status of Compliance - Federal Labor and Employment Laws

Affirm that the Eligible Entity required subgrantees to certify compliance with existing federal labor and employment laws.

Yes

11.4 Status of Compliance - Low-Cost Service Option

Certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.

Yes

11.6 Status of Compliance - Network Reliability and Resiliency

Certify that all subgrantees have planned for the reliability and resilience of BEAD-funded networks.

Yes

3.1 Timeline of All BEAD Grant Activities

Has the Eligible Entity taken measures to: (a) ensure that each subgrantee will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant; (b) ensure that all BEAD subgrant activities are completed at least 120 days prior to the end of the Eligible Entity's period of performance, in accordance with 2 C.F.R. 200.344; and (c) ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by the end of the period of performance for its award, in accordance with 2 C.F.R. 200.344.

As stated in the SCBBO's IPv2, one of South Carolina's objectives for the BEAD Program is to expand access and efficiently coordinate the rapid deployment of broadband infrastructure. To do so, the SCBBO has taken measures to provide broadband connections to unserved and underserved locations in South Carolina in a timely manner compliant with the BEAD Statute and NOFO.

Providing Broadband Service to Project Areas within Four Years

To ensure that each subgrantee begins providing service within four years of receiving the subgrant, the SCBBO conducted a detailed evaluation of applicants to ensure they meet the minimum qualifications required for financial, managerial, operational, and technical capabilities. Additionally, the SCBBO will enter into a binding Grant Agreement with all subgrantees that ensures adherence to all BEAD requirements as outlined in the BEAD NOFO, BEAD RPN, and 47 USC § 1702. The SCBBO verified that each selected applicant was capable of executing the funded activities competently and in full compliance with applicable federal, state, and local laws.

The SCBBO required applicants to submit the following documents to complete gating during the selection phase of the SC BEAD program:

- Technical Capability Attachments: Network designs in PDF and GIS format, BSL File of Proposed SC BEAD Locations to Serve, Network diagram, Capital Investment Schedule, Completed, Signed Professional Engineer Certification
- Financial Capability Attachments: Audited Financial Statements (only for applicants that did not previously provide audited financials), Single Audits (if applicable), Evidence of having the necessary funds to cover all project costs that exceed the amount of the grant, Commitment Letter for Letter of Credit or Performance Bond (Letter of Credit or Performance Bond due prior to grant agreement signing)
- Managerial Capability Attachments: Resumes for key management personnel and certifying engineers and examples of relevant work experiences
- Other Public Funding: Information and disclosures on other public funding received by the provisional subgrantee

Completing Subgrantee Activities 120 Days Prior to the End of the Period of Performance

To ensure all BEAD subgrant activities are completed at least 120 days before the end of the Eligible Entity's performance period, in accordance with 2 C.F.R. 200.344, the SCBBO required each selected applicant to submit a build-out timeline and project milestones. Applicants were also required to provide a capital investment schedule showing full build-out and service initiation within four years of receiving the subgrant, along with an attestation that the proposed network meets the required broadband performance standards for all project locations.

To ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by the end of the State's period of performance for its award, in accordance with 2 C.F.R. 200.344, SCBBO will conduct thorough subgrantee monitoring and oversight, as detailed in the BEAD Program Monitoring Plan that ensures key milestones are met as prescribed in grant agreements. SCBBO will adopt a phased approach to monitoring subgrantees throughout the life cycle of the BEAD grant award, which will include a subgrantee risk assessment, subgrantee kick off, monitoring and oversight activities, and subgrantee closeout.

Completing SCBBO Activities by the End of the Period of Performance

The SCBBO will ensure all other contract support services are closed out at least 120 days prior to the State's Period of Performance end date. The SCBBO will provide assistance, on an as-needed basis, as available, to all recipients of SC BEAD funds as part of the SC BEAD program in accordance and compliance with 2 C.F.R. 200.344.

5.1 Local Coordination - Public Comment

Describe the public comment period and provide a high-level summary of the comments received by the Eligible Entity during the public comment period, including how the Eligible Entity addressed the comments.

The SCBBO provided a public comment period that began on September 19 and concluded the morning of September 29, 2025, thus providing 10 full calendar days and exceeding the statutory requirement of 7 calendar days. In total, the SCBBO received 10 public comments. Entities providing feedback were:

ISP	2
Labor Union	1
National Lab	1
Non-Profit	1
SC Legislature	1
Telecomm Consultant	1
Trade Association	2
US Congress	1
TOTAL	10

Broadly, the SC BEAD Public Comments coalesced in the following categories:

Affordability

The SCBBO was asked to maintain focus on affordability and look for ways to leverage unobligated funds to bridge the affordability barrier to brighten the future of work, healthcare, and education.

Draft Grant Agreement

Multiple recommendations for edits to the BEAD Draft Agreement were received by the SCBBO.

Local Coordination

The SCBBO was encouraged to continue to notify rural and marginalized communities via multiple channels including elected officials, social media, chambers of commerce, local newspapers, political parties, and charitable and civic engagement organizations.

Prequalification Requirements

The SCBBO was encouraged to review FCC reporting for all applicants to ensure that program participants are current and capable of meeting ongoing reporting requirement.

Request for Reconsideration

The SCBBO had a request to modify one or more of its award decisions.

Unobligated Funds

The SCBBO received multiple suggestions for ways to utilize South Carolina's unobligated BEAD funds including precision agriculture, education, healthcare, leveraging "dark fiber" assets, multiple dwelling units, national security, public safety, and resilience.

The SCBBO is grateful for all of the comments it received, and many will be leveraged in the future as the SCBBO works through curing with NTIA, further guidance is provided, and draft agreements are finalized in collaboration with ISPs.

14.1 EHP Documentation Upload

Submit a document which includes the following:

Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's National Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.

Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.

Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/regional-programmatic-environmental-impact-statements>.

Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.

Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

EHP Documentation Requirement 14-09-30-2025 09-57-EXECUTIVE OFFICE OF THE STATE OF SOUTH C-GRN-000156.pdf

16.1 Prohibition on Excluding Provider Types

Does the Eligible Entity certify that it did not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for a BEAD subgrant, consistent with the requirement at 47 U.S.C. § 1702(h)(1)(A)(iii)?

Yes

17.1 Waivers

If any waivers are in process and/or approved as part of the BEAD Initial Proposal or at any point prior to the submission of the Final Proposal, list the applicable requirement(s) addressed by the waiver(s) and date(s) of submission. Changes to conform to the BEAD Restructuring Policy Notice should be excluded. If not applicable to the Eligible Entity, note 'Not applicable.'

Waiver Description | Applicable requirement(s) addressed | Date of submission

BEAD Performance Bonds less than 100% Waiver | SCBBO IPV2 did not reflect programmatic waiver from NTIA allowing for 10% performance bond | September 18, 2025

BEAD Requirement that reimbursement is for periods of no more than 6 months Waiver | SCBBO requesting approval to remove this requirement and allow for an enhanced disbursement schedule based on performance/percent completion | September 18, 2025

Final Proposal Funding Request Amount

Enter the amount of the Final Proposal Funding Request.

546535983.05

Project Narrative

Submit the Eligible Entity's project narrative.

SCBBO FPFR Project Narrative (2025-09-30)-09-30-2025 12-09-EXECUTIVE OFFICE OF THE
STATE OF SOUTH C-GRN-000156.docx

Consolidated Budget Form

Submit the Eligible Entity's consolidated budget form.

SCBBO BEAD FPFR (2025-09-30)-09-30-2025 11-03-EXECUTIVE OFFICE OF THE STATE OF
SOUTH C-GRN-000156.xlsx
