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June 19, 2025

Courtney Dozier
Acting Director Broadband Equity, Access, and Deployment Program
National Telecommunications and Information Administration
1401 Constitution Avenue, NW
Washington, DC 20230

RE: June 6, 2025, BEAD Restructuring Policy Notice

Dear Mrs. Dozier,

The SC Broadband Office (SCBBO) which is housed within the South Carolina Office of Regulatory Staff, and on behalf of the Executive Office of the State of South Carolina (Eligible Entity) submits this letter to request an Initial Proposal (IP) correction pursuant to the June 06, 2025, BEAD Restructuring Policy Notice (Notice). This letter requests incorporation of the terms of the Notice into our IP. The SCBBO confirms that it must modify its previously approved subgrantee selection process to conform to the terms of the Notice. It will also take all other actions needed to conform the implementation of its BEAD award to the requirements contained in the Notice. The SCBBO will not submit a budget modification to accompany this IP correction request.

To meet the 90-day requirements of, and as a complement to the Notice, the SCBBO will also be making the following changes to the IP to streamline the application process and accelerate the deployment of BEAD funds in South Carolina. The following additional modifications are directly necessary to comply with the Notice:

Project Area Definition – The SCBBO is changing the project area definition from Zip Code Tabulation Area (ZCTA) to a single BEAD-eligible Broadband Serviceable Location (BSL). Each BSL will be evaluated by itself. Internet Service Providers (ISPs) will be able to bid for as many BSLs as they desire in a single application.

Subgrantee Selection | Gating – The SCBBO will first score all projects and then winners (as defined by the Notice) will be gated following all applicable elements remaining as part of the IP.

Subgrantee Selection | Application Publication – Due to time restrictions, the SCBBO will no longer publish all applications for comment during Subgrantee Selection.

Coverage for Locations with No Proposals – If necessary, at the conclusion of Subgrantee Selection, the SCBBO will negotiate in good faith directly with ISPs to obtain a high-speed broadband solution.

Subgrantee Accountability – The SCBBO is eliminating the provision 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 – 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.

BEAD Eligibility | Status of Locations – On June 13, 2025, NTIA notified the SCBBO that it <u>did</u> <u>not receive</u> notice of any defaults or change in service area for Federal enforceable commitments in South Carolina. In addition, by the June 17, 2025, deadline, the SCBBO <u>did not receive</u> any responses from Unlicensed Fixed Wireless (ULFW) providers claiming existing services in South Carolina. Therefore, the SCBBO will continue to use the NTIA-approved post challenge locations list without modification.

In conclusion, the SCBBO believes that the above IP modifications, in combination with the mandatory changes from the Notice, will result in the most streamlined deployment of BEAD resources for South Carolina. Our ability to meet the 90-day requirements of the Notice are predicated on NTIA's timely written confirmation and acceptance of this letter as soon as possible. Accordingly, we are respectfully requesting confirmation and acceptance by Tuesday June 24, 2025.

If you have any questions, or further clarification is required, I may be reached at (803) 606-6398 or jstritzinger@ors.sc.gov.

Sincerely,

James R. Stritzinger, Jr.

Director, SC Broadband Office