



BEAD Program Technical Assistance Resource

BEAD Milestones LEO Capacity Subgrant

Resource Version:

Version	Date
1	9/15/2026

Resource Details:

Category	Milestones
Summary	Subrecipients are required to meet specific performance milestone requirements to receive payment for BEAD awards. This document provides an overview of what documentation is generally required to meet each milestone for a LEO Capacity Subgrant, and how to request review of completed milestones. The Commission reserves the right to request additional supporting documentation for milestone completion. Note, the milestones described below are the baseline and individual projects may have amended milestones. This document provides milestone related technical assistance for BEAD LEO Capacity Projects. The technical assistance document for deployment projects is available here .
WI BEAD contact:	PSCBeadGrants@wisconsin.gov

Disclaimer: This document is intended solely to assist subrecipient in better understanding the Wisconsin BEAD program and associated policies/processes. This document does not supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the terms and conditions of the award, or the Grant Agreement. In all cases, statutory and regulatory mandates, the terms and conditions of the award, and NTIA policies and guidance shall prevail over any inconsistencies contained in this document.

Introduction

Wisconsin's BEAD Grant Awards are considered Fixed Amount Subawards (FASA), which are a type of grant program where payments are based on meeting specific milestones. Section 7.0 of the Grant Agreement outlines the baseline milestones for the award. Milestones may be changed upon mutual agreement via a formal Grant Agreement Amendment. Every item within the milestone must be completed to receive the allowable payment for that specific milestone. The requirements for each part of every milestone are listed in the table below.

Table: Milestone Achievement Documentation

Milestone Number	Milestone	Required Documentation	How to Submit
1	Subrecipient and Commission enter into a fully executed Grant Agreement, which includes approved scope of work, project budget, network design, details on the low-cost service option, and deployment schedule(s).	Executed Grant Agreement.	No submission necessary. Commission will add executed Grant Agreement to the Grants Management System (GMS) .
	Subrecipient submits required Protecting the BEAD Program from Default Certification.	Default Certification.	Upload to your BEAD Letter of Intent project within the GMS using "Attestation" as the document type.
	Subrecipient submits Commission Onboarding Questionnaire and documentation.	Completed Onboarding Questionnaire.	Complete the questionnaire using this link: https://forms.office.com/g/QGSat36vsH .
	If applicable, subrecipient submits Tribal Consent.	Tribal Consent Resolution (If applicable).	Return completed documents to PSCBeadGrants@wisconsin.gov .
	Subrecipient submits a Letter of Credit OR Performance Bond for the proper amount accepted by the Commission.	Letter of Credit OR Performance Bond.	Upload to your BEAD Letter of Intent project within the GMS using "Onboarding" as the document type.
	Subrecipient provides evidence of actual Eligible Costs that equal OR exceed 10% of the BEAD Award. Expenses reviewed and approved by Commission.	Documentation of eligible expenses equaling at least 10% of the BEAD award.	Submit in the 'Expenses' tab of the project in the GMS .

2	Subrecipient has submitted the BEAD Environmental Impacts and Documentation Screening (EIDs) Packet for the project and the associated GIS files. OR subrecipient has submitted an Attestation with sufficient detail that project fits the NTIA guidance for a NEPA exemption.	Complete and submit accurate EIDS Packet for the project. OR Attestation with sufficient detail that project qualifies for an exemption.	Upload to specific BEAD project within the GMS using the "NEPA Environmental Questionnaire" as the document type. OR upload to a specific BEAD project within the GMS using the "Attestation" as the document type.
	Subrecipient attests that all required permits have been applied for OR that the permit needs to be applied for closer to the planned construction.	Letter attesting that all required permits have been applied for, including a list of permits that have already been applied for and a detailed timeline for applying for the remaining permits.	Upload to specific BEAD project within the GMS using the "Letter" document type.
	Subrecipient provides evidence of actual Eligible Costs that equal OR exceed 20% of the BEAD Award. Expenses reviewed and approved by Commission.	Documentation of eligible expenses equaling at least 20% of the BEAD award.	Submit in the 'Expenses' tab of the project in the GMS.
3	Subrecipient has received a NEPA Decision Memo for the entire project. OR the Commission has reviewed and accepted the Attestation requesting the exemption.	NEPA Decision Memo for the entire project. OR letter from the Commission accepting the exemption request.	No submission necessary. Commission will add NEPA Decision Memo OR a letter accepting the exemption request to the BEAD project in the GMS.
	Subrecipient provides evidence of a pre-construction meeting OR meeting invitation. OR documents that no underground facilities will be impacted.	Pre-Construction Documentation may include the pre-construction meeting minutes OR if a meeting did not occur, provide evidence that the subrecipient attempted to contact the affected	Submit the Pre-Construction Meeting Documentation to the specific BEAD project within the GMS using the "Letter" document type.

		utility owners to schedule a preconstruction meeting OR provide evidence that the project has no impact on underground facilities.	
	Subrecipient provides evidence of actual Eligible Costs that equal OR exceed 30% of the BEAD Award. Expenses reviewed and approved by Commission.	Documentation of Eligible Expenses equaling at least 30% of the BEAD award.	Submit in the 'Expenses' tab of the project in the GMS .
4	Subrecipient submits Certification Request to the Commission that it has sufficient capacity for each BSL in the project and it can initiate broadband service within 10 business days to every BSL in the Grant Agreement Scope of Work with no charges OR delay attributable to the extension of service including for subscribers that do not wish to self-install.	A letter certifying that the subrecipient has sufficient capacity for every BSL in the project. The letter must include an Excel attachment with each serviceable BSL and whether the customer at that BSL is currently subscribed OR at what speed.	Upload the letter and Excel file to the specific BEAD project within the GMS using the "Attestation" document type.
	Subrecipient provides evidence of actual Eligible Costs that equal OR exceed 40% of the BEAD Award. Expenses reviewed and approved by Commission.	Documentation of expenses equaling at least 40% of the BEAD award.	Submit in the 'Expenses' tab of the project in the GMS .
	Subrecipient provides documentation of 50% of required matching funds. Match reviewed and approved by Commission.	Sum of BEAD Match Templates with documentation equaling at least 50% of match requirement.	Submit match – using the BEAD Match Template – to the 'Expenses' tab of the project in the GMS .
5	The Commission has reviewed and accepted the request to certify capacity grant including completion of any initial performance testing.	Letter from the Commission. The Commission may require additional data OR inspection prior to certification.	No submission necessary. Commission will add a letter accepting the certification request once their review is complete to the BEAD project in the GMS .

	Subrecipient provides evidence of actual Eligible Costs that equal OR exceed 50% of the BEAD Award. Expenses reviewed and approved by Commission.	Documentation of expenses equaling at least 50% of the BEAD award.	Submit in the 'Expenses' tab of the project in the GMS .
	Subrecipient provides documentation of 75% of required matching funds. Match reviewed and approved by Commission.	Sum of BEAD Match Templates with documentation equaling at least 75% of match requirement.	Submit Match – using the BEAD Match Template – to the 'Expenses' tab of the project in the GMS .
6	Subrecipient must provide documentation demonstrating that at least 10% of BSLs within the project area have subscribers to service that either: 1. Initiated after the date the Subrecipient submitted its request for project certification; OR 2. Received new customer premises equipment after the date of the certification request – if customer was existing.	Templated list showing 10% of BSLs initiated service OR received new customer premise equipment after the subrecipient posted a letter certifying sufficient capacity and list of serviceable BSLs that included current customers.	Additional template will be forthcoming after milestone 4 is reached.
	Subrecipient provides evidence of actual Eligible Costs that equal OR exceed 60% of the BEAD Award. Expenses reviewed and approved by Commission.	Documentation of expenses equaling at least 60% of the BEAD award.	Submit in the 'Expenses' tab of the project in the GMS .
7	Subrecipient must provide documentation demonstrating that at least 20% of BSLs within the project area have subscribers to service that either: 1. Initiated after the date the Subrecipient submitted its request for project certification; OR 2. Received new customer	Templated list showing 20% of BSLs initiated service or received new customer premise equipment after the subrecipient posted a letter certifying sufficient capacity and list of serviceable BSLs that included current customers.	Additional template will be forthcoming after milestone 4 is reached.

	premises equipment after the date of the certification request – if customer was existing.		
	Subrecipient provides evidence of actual Eligible Costs that equal OR exceed 70% of the BEAD Award. Expenses reviewed and approved by Commission.	Documentation of expenses equaling at least 70% of the BEAD award.	Submit in the 'Expenses' tab of the project in the GMS .
8	Subrecipient must provide documentation demonstrating that at least 25% of BSLs within the project area have subscribers to service that either: 1. Initiated after the date the Subrecipient submitted its request for project certification; OR 2. Received new customer premises equipment after the date of the certification request – if customer was existing.	Templated list showing 25% of BSLs initiated service OR received new customer premise equipment after the subrecipient posted a letter certifying sufficient capacity and list of serviceable BSLs that included current customers.	Additional template will be forthcoming after milestone 4 is reached.
	Subrecipient provides evidence of actual Eligible Costs that equal OR exceed 80% of the BEAD Award. Expenses reviewed and approved by Commission.	Documentation of expenses equaling at least 80% of the BEAD award.	Submit in the 'Expenses' tab of the project in the GMS .
	Subrecipient provides documentation of 100% of required matching funds. Match reviewed and approved by Commission.	Sum of BEAD Match Templates with documentation equaling at least 100% of match requirement.	Submit Match – using the BEAD Match Template – to the 'Expenses' tab of the project in the GMS .
9	Subrecipient must provide documentation demonstrating that at least 45% of BSLs within the project area have subscribers to service that either: 1. Initiated after the date the	Templated list showing 45% of BSLs initiated service OR received new customer premise equipment after the subrecipient posted a letter certifying sufficient capacity and list of	Additional template will be forthcoming after milestone 4 is reached.

	Subrecipient submitted its request for project certification; OR 2. Received new customer premises equipment after the date of the certification request – if customer was existing.	serviceable BSLs that included current customers.	
	Subrecipient has submitted all grant Close Out Reports.	Final Close Out Reports submitted.	Additional guidance is forthcoming.
	All required inspections and evidence of complete and approved performance testing for every year of the extended performance period.	Additional guidance is forthcoming.	Additional guidance is forthcoming.
	The entire performance period is complete, including the 10-year extended performance period which is 10 years from the date the Commission accepts the certified network.	Dates established in the Grant Agreement.	No submission necessary. The Commission will determine based on the date the Network Capacity Certification is approved and as outlined in the Grant Agreement.
	Subrecipient provides evidence of actual Eligible Costs that equal OR exceed 100% of the BEAD Award. Expenses reviewed and approved by Commission.	Documentation of expenses equaling at least 100% of the BEAD award.	Submit in the 'Expenses' tab of the project in the GMS .

Milestone Review Request

Per section 6.15 of your Grant Agreement, subrecipients must submit all evidence of costs that have been paid at least every six months in alignment with the semi-annual reporting period and must promptly request review of any completed milestone not later than 30 days of achieving the milestone.

Once all the required documentation for a milestone has been submitted, the subrecipient must go into the project's 'Milestones' tab within the Grants Management System and check the "Request Review of Milestone" box associated with the specific milestone. Commission staff will then review submissions and reach out with any questions.

Project Details	Contacts	Budget	Expenses	Payments	Milestones	Uploads	Related
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Grant Project Milestones					
-- Choose Milestone --					
Sort Order	Name	Description	Percent Cap	Request Review of M...	
1	BEAD milestone 1	Executed Grant Agreem...	10	☒	
2	BEAD milestone 2	Subrecipient has submitt...	20	☐	
3	BEAD milestone 3	Subrecipient has receive...	30	☐	
4	BEAD milestone 4	Subrecipient provides do...	40	☐	
5	BEAD milestone 5	Subrecipient provides ev...	55	☐	
6	BEAD milestone 6	Subrecipient provides ev...	70	☐	
7	BEAD milestone 7	Subrecipient provides ev...	85	☐	
8	BEAD milestone 8	Subrecipient provides ev...	100	☐	

Additional Resources:

- BEAD Grant Agreement (Sections 6 & 7)
- [NTIA BEAD Guidance on NEPA and NHPA for LEO Satellite Service](#)
- [Utility Locating Pre-Construction Meeting](#) Technical Assistance Document
- [BEAD Match Template \(June 24, 2026\)](#) | [Resource Document](#)
- BEAD Cost Evidencing: [Webinar Recording](#) | [Webinar Slides](#) | [Resource Document](#)
- [BEAD Initial Requirements Submission Reference Sheet v.2 \(June 25, 2026\)](#)
- [EIDS Instruction and Resources Version 3 \(April 2026\)](#)
- [EIDS Questionnaire Version 3 \(April 2026\)](#)
- Grants Management System (Getting Started): [Webinar Recording](#) | [Webinar Slides](#) | [Resource Document](#)
- Grants Management System (Projects Tour): [Webinar Recording](#) | [Webinar Slides](#) | [Resource Document](#)