



INTERNET FOR ALL WISCONSIN

*Broadband Equity, Access, and
Deployment Grant Program (BEAD)*

*Post-Award
Frequently Asked Questions*

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Change Log	
Updated	Content updated
4/29/2026	Added question 53.
3/10/2026	Republished FAQ for post-award administration. See historical versions for pre-award questions.
6/27/2025	Pre-Award FAQ published See PSC ERF #551843 .

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Contact: PSCBEADGrants@wisconsin.gov

Disclaimer: The guidance provided in this document is informational and cannot supersede Wisconsin or federal law, National Telecommunications and Information Administration (NTIA) guidance, BEAD General Terms and Conditions, or the contents of the approved BEAD Final Proposal for Wisconsin. The Wisconsin Broadband Office (WBO) reserves the right to modify this guidance as necessary to effectuate the goals of the BEAD program and remain compliant with any new or updated NTIA guidance or requirements.

General Public FAQs

1. What locations were awarded BEAD funding? How can I figure out if my location has a BEAD award?

175,464 homes and businesses in Wisconsin lacking capable broadband service speeds of 100/20 Mbps were awarded BEAD funding. Visit the [Wisconsin BEAD Awardees Map](#) to see which locations have a BEAD award. The Wisconsin BEAD Awardee map allows a user to search by address.

2. What is a broadband serviceable location (BSL)?

According to the FCC, a broadband serviceable location (BSL) is “a business or residential location in the United States at which mass-market fixed broadband Internet access service is, or can be, installed.”

For more information, see FCC’s help article [here](#).

3. My location was not awarded BEAD funds, but my internet is insufficient. Do I have other options?

Visit the PSC’s [Wisconsin Broadband Map](#) and search the location information to see what other internet service options are currently available and to check if a location is included in any other in progress or completed state or federally funded internet expansion program.

Locations not awarded BEAD funding could be eligible for future state grants - per Wis. Stat. § 196.504(2) - as funding is made available.

4. When can I expect BEAD awarded projects to be completed and when can I access service?

NTIA requires that all BEAD subgrantees must deploy the planned broadband network, regardless of the technology utilized, and be able to perform a standard installation for each customer that desires broadband services within the project area not later than four years after the date on which the subgrantee signs the Grant Agreement. In some circumstances a BEAD project may be eligible to receive an extension of time beyond the initial four years. Grant agreements are anticipated to be signed in 2026 which will require the BEAD projects to be completed by 2030, unless an extension is approved.

5. My location was originally eligible for BEAD but did not receive a BEAD award. Why not?

It is likely that your location was determined to no longer be eligible for BEAD funding under the updated BEAD Restructuring Policy Notice or because it now has access to 100/20 Mbps or better service. See page 13 of the [NTIA BEAD Restructuring Policy Notice](#) for more details on optimizing eligible locations.

6. I had previously seen in the news that my location was planned to be constructed with fiber internet. Why is this no longer happening?

In June, 2025, the federal government released the [BEAD Restructuring Policy Notice](#), drastically changing the rules regarding how states could administer BEAD funding. This Policy Notice required Wisconsin to cancel its previous preliminary awards and rerun its awarding process under new rules, which removed the preference for fiber technology and most of the scoring components.

Before the restructuring of the BEAD program, Wisconsin intentionally designed the competitive grant round to include a diverse set of scoring criteria that included community support and engagement, but the restructuring of the program moved qualitative scoring to a secondary tier of the selection process. The primary selection criteria mandated that states award applications based on lowest cost per location.

7. What is a community anchor institution (CAI), and are they eligible for BEAD funding?

A “community anchor institution” (CAI) must conform to the statutory definition of a CAI established under the Infrastructure Investment and Jobs Act (IIJA), which means an entity such as a school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, public housing organization, or community support organization that facilitates greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals. CAIs eligible for BEAD funding were those locations lacking access to 1000/1000 Mbps symmetrical broadband service.

8. My location was on the list of community anchor institutions (CAIs) eligible for funding but does not appear to have been awarded funding. Why not?

NTIA does not require all eligible CAIs to be served. Instead, applicants had the option of proposing to serve CAIs alongside their BEAD awards. In many cases, no applicant proposed to serve a CAI and thus no additional funding was awarded.

9. What is the Low-Cost Service Option for the provider serving my location?

NTIA’s BEAD Restructuring Policy Notice removed some of the previous low-cost service plan criteria. The new low-cost service plan criteria allows providers to submit their own low-cost service plan. Submitted plans must offer speeds of at least 100/20 Mbps and latency performance of no more than 100 milliseconds. Applicants that already offer a low-cost option that meets the service requirements may satisfy the low-cost service requirement by proposing to offer their existing low-cost option to eligible subscribers.

See the following table for offered low-cost service plans by BEAD subrecipient:

Entity	Technology	LCSO	ERF #
AMG Technology Investment Group, LLC	Fixed Wireless	\$65	PSC REF#: 571022
Bertram Communications LLC	Fiber	\$30	PSC REF#: 571023
Hilbert Communications	Fiber	\$55	PSC REF#: 571027
Hilbert Communications	Fixed Wireless	\$55	PSC REF#: 571028
Comcast Cable Communications Management LLC	Fiber	\$29.95	PSC REF#: 575830
Connect Holding II LLC	Fiber	\$49	PSC REF#: 571026
Country Wireless	Fixed Wireless	\$49.99	PSC REF#: 571029
CTC Telcom Inc.	Fiber	\$65	PSC REF#: 571033
East Central Energy	Fiber	\$65	PSC REF#: 571034
Edge Broadband LLC	Fiber	\$29	PSC REF#: 571035
Frontier North Inc.	Fiber	\$30	PSC REF#: 571036
Hillsboro Telephone Company, Inc.	Fiber	\$70	PSC REF#: 571037
La Valle Telephone coop	Fiber	\$63	PSC REF#: 571038
Lac du Flambeau Band of Lake Superior Chippewa	Fiber	\$58	PSC REF#: 571039
Lakeland Communications Group, LLC	Fiber	\$85	PSC REF#: 571041
Lemonweir Valley Telephone Company	Fiber	\$40	PSC REF#: 571042
Marquette-Adams Telephone Cooperative	Fiber	\$70	PSC REF#: 571043
Mount Horeb Telephone Company	Fixed Wireless	\$46	PSC REF#: 571044
Mount Horeb Telephone Company	Hybrid	\$46	PSC REF#: 571045
NEIT Broadband LLC	Fiber	\$40	PSC REF#: 571046
NET LEC LLC	Fiber	\$35	PSC REF#: 571047
NET LEC LLC	Fixed Wireless	\$49	PSC REF#: 571048
Norvado Inc.	Fiber	\$85	PSC REF#: 571049
Pierce Pepin Cooperative Services	Fiber	\$59	PSC REF#: 571050
Pierce Pepin Cooperative	Hybrid	\$59	PSC REF#: 571052
Richland Grant Telephone Coop	Fiber	\$63	PSC REF#: 571053
Sokaogon Chippewa Tribe	Fiber	\$60	PSC REF#: 571054
Space Exploration Technologies Corp.	LEO Satellite	\$80	PSC REF#: 571055

Entity	Technology	LCSO	ERF #
Spectrum Mid-America LLC	Fiber	Existing low-cost plan	PSC REF#: 574211
St. Croix Chippewa Indians of Wisconsin	Fiber	\$80	PSC REF#: 577412
Waypoint Experts	Fiber	\$50	PSC REF#: 571057
Waypoint Experts	Fixed Wireless	\$50	PSC REF#: 571058
Wisconsin Bell LLC	Fiber	\$35	PSC REF#: 571060
Wittenberg Telephone Company Inc.	Fiber	\$50	PSC REF#: 571061
Wittenberg Telephone Company Inc.	Fixed Wireless	\$50	PSC REF#: 571062

10. What households will be eligible for the low-cost service option?

Eligibility to enroll in a low-cost service plan is the same as the FCC’s Lifeline Program, therefore, include households that participate in at least one of the following qualifying programs:

- Medicaid
- Foodshare
- Supplemental Security Income (SSI)
- Federal public house assistance (Section 8)
- Certain Tribal Assistance Programs
- Veterans and Survivors Pension Benefit

Or, if household income is at or below 135 percent of the federal poverty guidelines.

Subrecipient FAQs

Grant Management

11. What is an Authorized Organization Representative or AOR? Who should my organization (award subrecipient) designate as the AOR?

AOR means the authorized organization representative. This is the designated individual for the entity (subrecipient) who is entrusted with and has the legal authority to commit the organization to binding grant-related obligations, including signing the Grant Agreement. The AOR will be included in any major grant-related communications, including decision point/critical update emails, documents posted to ERF, any monitoring activities, etc.

12. Who will receive communications about my grant projects?

Those designated as the AOR and Primary contacts for your project will receive communications regarding your projects, other contact types will be included at the discretion of Commission staff based on the nature of the communication.

13. Where do I upload documents?

Requirement	To satisfy requirement	Mode of Submittal	Before/After GA
Build America, Buy America (BABA) compliance plan	1 per entity. Only needed if not already submitted with LOI. Certification to comply with BABA requirements (purchases or waiver) See also: Supplier self-certification disclaimer list https://www.commerce.gov/sites/default/files/2024-07/Disclaimer_Final.pdf	Grants System: BEAD LOI	Before GA
Cybersecurity Risk Management plan	1 per entity. Only needed if not submitted with LOI or if the entity has a new version since submission.	Grants System: BEAD LOI	Before GA
Supply Chain Risk Management plan (SCRM)	1 per entity. Only needed if not submitted with LOI or if the entity has a new version since submission.	Grants System: BEAD LOI	Before GA
Professional Engineering Certification	1 per project (as sent by the Wisconsin Broadband Office on 10/10/2025)	Grants System: BEAD LOI	Before GA
Letter of Credit/Performance Bond* (actual letter of credit/performance bond)	1 per project. Letter of Credit is due prior to the Grant Agreement being executed. Performance Bond is due within 60 days of the Grant Agreement execution. Note: entities may submit one LOC that lists all projects.	Grant System: Specific BEAD Project	LoC: Before GA Performance Bond: (Before or) after GA
Tribal Consent (if applicable)	1 per Tribe per project.	Email: PSCBEADGrants@wisconsin.gov	Before GA
Affirmative Action	Documents per project.	Grant System: specific BEAD project(s)	After GA
Onboarding Questionnaire	1 per entity.	Respond to the link that will be emailed.	After GA
Protecting BEAD from Default certification	1 per entity.	Grant System: BEAD LOI	After GA

Requirement	To satisfy requirement	Mode of Submittal	Before/After GA
NEPA Pre-Construction Timeline	Per project/subproject.	Grants System: Specific BEAD Project	After GA
Environmental Impacts and Documentation Screening Questionnaire	Per project/subproject.	Grants System: Specific BEAD Project	After GA
GIS requirements	Per project/subproject.	Grants System: BEAD project/subproject.	After GA

14. Will documents uploaded through the PSC Grants Management System (GMS) be posted to ERF?

This depends on the document type. Please see the [Grants System User’s Guide](#) “Document Types” section for more information on what types of documents get posted to ERF.

15. How do I request confidential handling of a document I need to submit?

First, check with the WBO to make sure that the file is allowed to be filed confidentially. There are specific reasons pursuant to Wisconsin Statute and Administrative Code that allow portions of certain documents to be filed confidentially.

If uploading a document directly to ERF, click on the “Confidential & Public Redacted” button under “Upload Documents”. Fill out each section of the request form, making sure to upload both a public redacted version and confidential unredacted version of the document(s). PSC does not accept documents that are completely redacted or blacked out.

When you are requesting confidential treatment for uploaded documents, you must either:

- Complete Section 3 of the confidentiality request form or
- Attach an affidavit, and the affidavit must be notarized.
 - The affidavit should contain all of the following:
 1. The name and address of the person making the request.
 2. The name and position of the individual filing the request on the person’s behalf.
 3. An accurate and complete summary of the contents of the record.
 4. How the record satisfies one of the criteria specified below:

Wis. Admin. Code § PSC 2.12; Wis. Stats §§ 196.14, 196.72 and 196.795 governs confidentiality under the following:

There is a reasonable basis to conclude that the record, or portion of a record, is one of the following:

- 1) The record contains trade secrets as defined in Wis. Stat. §134.90.
- 2) The record contains information which would aid a competitor of a public utility in competition with the public utility making the request under Wis. Stat. §196.14.
- 3) The record is an accident report under Wis. Stat. §196.72.
- 4) The record is protected business information under Wis. Stat. §196.795(9).
- 5) The record may otherwise be exempt from disclosure under the Public Records Law, Wis. Stat. §§19.31 to 19.39.

If you don't have a notary on staff, you can often find one at local banks, shipping stores, law offices and even some libraries.

If uploading a document into the GMS, click "Upload Confidential Document" in the "Uploads" tab, and complete the form as described above. If you have questions about which document type to file under, please reach out to your grants specialist.

16. What is the docket assigned to my entity for BEAD award purposes?

Subrecipient Legal Name	Subrecipient DBA	Docket
AMG Technology Investment Group LLC		12001-BD-100
Bertram Communications LLC		12002-BD-100
Hilbert Communications LLC	Bug Tussel	12015-BD-100
Comcast Corporation		12007-BD-100
Connect Holding II LLC	Brightspeed	12008-BD-100
Country Wireless, LLC		12009-BD-100
CTC Telcom Inc.		12010-BD-100
East Central Energy		12012-BD-100
Edge Broadband LLC		12013-BD-100
Frontier Communications Corporation		12014-BD-100
Hillsboro Telephone Company, Inc.		12016-BD-100
Lac du Flambeau Band of the Lake Superior Chippewa Indians		12018-BD-100
Lakeland Communications, Inc.		12019-BD-100
La Valle Telephone Coop		12020-BD-100
Lemonweir Valley Telephone Company	Lynxx	12021-BD-100
Marquette-Adams Telephone Cooperative, Inc.		12022-BD-100
Mount Horeb Telephone Company		12024-BD-100
NEIT Broadband LLC		12025-BD-100

Subrecipient Legal Name	Subrecipient DBA	Docket
NET LEC LLC.	Nsight	12026-BD-100
Norvado Inc.		12027-BD-100
Pierce Pepin Cooperative Services		12029-BD-100
Richland-Grant Telephone Cooperative, Inc.		12030-BD-100
Saint Croix Chippewa Indians of Wisconsin		12034-BD-100
Sokaogon Chippewa Tribe		12031-BD-100
Space Exploration Technologies Corp.	SpaceX	12032-BD-100
Spectrum Mid-America, LLC	Charter	12033-BD-100
Waypoint Experts	Bayfield Wireless	12036-BD-100
Wisconsin Bell LLC	AT&T Wisconsin	12037-BD-100
Wittenberg Telephone Company Inc.	Cirrinity	12038-BD-100

Low-Cost Service Plan

17. How will a recipient know if a household is eligible for the low-cost service plan?

BEAD recipients are responsible for verifying low-cost service option eligibility. An eligible subscriber must include any household at or below 135 percent of the federal poverty line, and/or that is eligible for the FCC’s Lifeline Program. The subrecipient may elect to use a broader definition of eligible subscriber that includes additional households.

Subrecipients must create and implement a public awareness campaign that includes information about low-cost service option and any applicable federal subsidies for low-income households as well as highlight the value and benefits of broadband service in order to increase the adoption of broadband service by consumers.

BEAD Locations

18. The latitude and longitude of the BSL my organization was awarded is not located on a structure that would subscribe to broadband service (e.g. an outbuilding, barn, non-habitable structure). Is it still required to connect service to the location?

Grant recipients are not required to construct service to locations that do not meet the definition of a BSL; but they should make a good faith effort to identify the actual adjacent structure that would meet the definition of a BSL. In the event no structure that meets the definition of a BSL is on the same tax parcel as the original latitude and longitude, the recipient should consult with the Commission.

In any instance where the latitude and longitude are incorrect, the recipient must report such discrepancies to the Commission promptly.

19. My organization is no longer able to construct service to a BSL listed in the Grant Agreement. What should it do?

This depends on the circumstances that prevent the construction. Contact the WBO at PSCBEADGrants@wisconsin.gov and provide a clear explanation of why the location is no longer able to be served.

Grant Agreement Terms

20. Will BEAD grant funds be Fixed Amount Subawards?

Yes, Wisconsin will issue fixed amount subawards and use NTIA guidance from the [Tailoring the Application of Uniform Guidance to the BEAD Program policy notice](#). Wisconsin will require evidence of costs and match documentation and certain performance milestones be met to receive milestone payment.

21. Will subrecipients be required to pay prevailing wages and benefits to workers, including compliance with Davis-Bacon and Service Contract Act requirements?

No, requirements in the BEAD NOFO for reporting on projects \$5 million or greater for BEAD was eliminated in the [Restructuring Policy Notice](#). Subgrantees satisfy the statutory requirements in this area by certifying compliance with Federal labor and employment laws to the WBO.

22. Do Build America, Buy America (BABA) provisions apply to the BEAD program?

Yes, see the following resources for additional details.

- [Build America Buy America | National Telecommunications and Information Administration](#).
- For detailed information on BABA compliance and reporting requirements, as well as how manufacturers can be listed on the BEAD BABA Self Certification list see [BABA Compliance and Self Certification | BroadbandUSA](#).
- For the full list of all DOC BABA waivers and the most up to date BABA FAQs visit the [Office of Acquisition Management Build America Buy America page](#).
- [Disclaimer Final.pdf](#).
- [Demonstrating compliance with the Buy America requirement | BroadbandUSA](#).

23. Can my entity apply for a BABA waiver?

A subrecipient may not directly request a federal waiver. Wisconsin, the eligible entity may submit a waiver to NTIA. Additional BABA waivers seem unlikely to be granted. Subrecipients who feel they need a BABA waiver must work directly with the WBO to

coordinate any waiver requests. Waiver requests must be approved prior to procurement. If the Commission concurred, the WBO would submit a proposed waiver to NTIA. NTIA has the authority, in certain circumstances, to submit waivers of the Buy America Preference to the Made in America Office (MIAO) located in the Office of Management and Budget. A proposed waiver must be posted for public comments for at least 15 days and undergo a MIAO review.

For the full list of all DOC BABA waivers, visit the [Office of Acquisition Management Build America Buy America page](#).

24. My BEAD project is awarded \$0 in federal funds. Does BABA still apply?

Yes. All BEAD requirements apply to all BEAD awards, including \$0 subgrants.

25. How long is the Federal Interest Period for BEAD facilities?

Per the NTIA policy notice, “[Tailoring the Application of the Uniform Guidance to the BEAD Program](#)”, the Federal interest period 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.

Eligible Costs and Payment

26. How will my fixed subaward grant be paid out?

Applicants will be required to document costs and match incurred and paid consistent with Commission evidence of costs’ requirements, which specify costs must be reasonable, allocable and directly attributable to the project. In addition, the subrecipient will be required to meet certain performance milestones to receive payment. Evidence of cost and performance milestone progress will be required at a minimum every six months for subrecipients. Payments will be made when the milestones in the Grant Agreement(s) are reached and reviewed by the Commission

27. What are the Grant Agreement milestones and how can a subrecipient certify completion of a milestone?

Grant Agreement milestones are events and measures that trigger partial payment of a BEAD award and require proof of completion prior to payout. You can find the milestones in your Grant Agreement.

28. When will BEAD costs become eligible for reimbursement? When can a subrecipient receive their first reimbursement?

Milestones for Fixed Amount Sub-Awards (FASAs) must either be met or showing substantial progress toward being met in order to receive payment. You can find the list of milestones in the BEAD Grant Agreement. BEAD subgrantees should note that:

- Advance payments for activities not yet undertaken are not allowed.
- Project implementation activities (e.g., site preparation, demolition, construction, ground disturbance, or fixed installation) may not begin prior to the completion of all Environmental and Historic Preservation requirements for the relevant NEPA Project Area.
- Subgrantees that undertake project activities prior to the Grant Agreement being executed proceed at their own risk and may face de-obligation of funding.

Additionally, the Commission may not pay any subaward funds until the subgrantee has secured the required letter of credit or performance. If a BEAD subgrantee has more than one BEAD project within an Eligible Entity, they may meet the BEAD letter of credit requirement with a letter of credit or performance bond that lists multiple BEAD projects in the Eligible Entity and the value assigned to each project. This is intended to simplify administration and does not alter the BEAD letter of credit requirement in any way. See [NTIA BEAD FAQs](#).

29. What costs are eligible before a NEPA review is completed?

The Commission may make payments to a subgrantee prior to completion of NEPA, but only for costs that have already been incurred. Those costs must always be allocable, reasonable, and necessary to the performance of the subgrant. Reasonable, permissible non-construction activities include completing studies, surveys, and other reviews necessary to apply for environmental permits or preliminary procurement such as the purchase or lease of equipment (see [General Terms and Conditions for NTIA BEAD Program Funds](#) at 13.E for the complete list of permissible pre-implementation activities). Eligible Entities may also allow subgrantees to claim reimbursement for pre-subgrant costs in certain circumstances in accordance with 2 CFR 200.458. For further guidance, see [Accelerating the Construction of BEAD Projects](#). See [NTIA BEAD FAQs](#).

30. For a project that is divided into NEPA subprojects, can a subrecipient receive reimbursement for construction costs after the first subproject is approved?

If a BEAD project is divided into NEPA Subproject Areas, construction-related activities (including ground-disturbing activities) can begin for a NEPA Subproject Area after NTIA has issued a Final NEPA decision memo for that NEPA Subproject Area, even if other parts of the BEAD project have not yet obtained final NEPA approval. In addition,

limited permissible pre-NEPA non-construction activities are detailed in Section 13.E of the BEAD General Terms and Conditions. See [NTIA BEAD FAQs](#).

31. How can a subrecipient document in-kind match? What are examples of in-kind match?

The Commission is responsible for verifying match. All match submitted to the Commission must:

- Ensure records include the source, amount, quantity, time, and delivery of each match service.
- Retain records through the life of the grant and grant closeout.
- Consider Letters of Commitment for match and then compare actual match against stated commitments. See [BEAD General Terms and Conditions \(Nov. 2025\)](#)

Some examples of documentation for third party in-kind match might include:

- For volunteer services where the rate must not exceed fair market value, use federal tools such as the Bureau of Labor Statistics to determine wage rate information. To the extent feasible, require similar methods to record time as an organization would for paid labor, such as timesheets and timecards.
- For reduced rates from consultants and other individuals, consider comparing current charges against standard or set labor category rates.
- For facility in-kind match verify amount against current mortgage statements or rental rates. [BEAD Match Primer](#).

Letter of Credit and Performance Bond

32. What is required from subrecipients to fulfill the letter of credit requirements and when do they need to be submitted?

There are two required components for the letter of credit:

- (1) Following the subgrantee selection process, preliminary awarded subgrantees need to submit a letter from a bank (meeting eligibility requirements consistent with those set forth in 47 C.F.R. § 54.804(c)(2)) committing to issue an irrevocable standby letter of credit to the prospective subgrantee. A letter of credit must include, at minimum, the dollar amount of the letter of credit and the issuing bank's agreement to the terms and conditions in the provided model letter of credit.
- (2) Before executing a Grant Agreement, a prospective subgrantee must provide an irrevocable standby letter of credit.

Per the [NTIA letter of credit conditional programmatic waiver](#) (specifically consistent with section 2.4), subgrantees will commit to maintain a letter of credit or performance bond in the amount of 10 percent of the subaward until it has demonstrated to satisfaction of the Eligible Entity that it has completed the buildout of 100 percent of locations to be served by the project or until the period of performance of the subaward has ended, whichever occurs first.

33. Are there examples or templates that applicants should use for fulfilling the letter of credit documentation requirements?

Yes. The Commission has published a [model \(template\)](#) letter of credit that prospective subgrantees should utilize for their irrevocable standby letter of credit that must be submitted prior to the execution of the Grant Agreement. The model letter of credit is available on [the BEAD Grants webpage](#) and in docket [5-BD-2025](#). Prospective subgrantees should reference the terms and conditions of this model letter of credit when working with their bank or credit union to obtain the initial commitment letter for an irrevocable standby letter of credit.

34. What is required from subrecipients if they decide to obtain a performance bond instead of a letter of credit and when does the documentation need to be submitted?

Like the letter of credit process, there are two required components for the performance bond requirement:

- (1) Following the subgrantee selection process, preliminary awarded sub grantees need to submit a letter from [a company holding a certificate of authority as an acceptable surety on federal bonds - as identified in the Department of Treasury Circular 570](#) - committing to issue a performance bond to the prospective subgrantee. The letter must, at minimum, provide the dollar amount of the performance bond.
- (2) Within 60 days of executing a Grant Agreement, the prospective subgrantee must obtain and provide documentation of the performance bond that complies with BEAD program.

Per the [NTIA letter of credit conditional programmatic waiver](#) (especially consistent with section 2.4), subgrantees will commit to maintain a letter of credit or performance bond in the amount of 10 percent of the subaward until it has demonstrated to satisfaction of the Commission that it has completed the buildout of 100 percent of locations to be served by the project and all program reporting requirement or until the period of performance of the subaward has ended, whichever occurs first.

35. Are there examples or templates that subrecipients should use for fulfilling the Performance Bond documentation requirements?

No, the WBO will not be providing a model performance bond per NTIA guidance in the conditional programmatic waiver. If an entity is pursuing a performance bond to fulfill the BEAD requirement, we advise you work with your legal counsel to ensure the rules and requirements of BEAD are reflected.

36. Does a subrecipient need their letter of credit or performance bond before they sign the Grant Agreement?

Per updated guidance from NTIA (see 8.5 [BEAD FAQ Version 18](#)), Wisconsin has included a provision in the BEAD Grant Agreement that allows subrecipients to submit a Performance Bond within 60 days following the execution of the Grant Agreement.

Letters of credit are required to be submitted before the execution of BEAD Grant Agreements.

Reporting and Compliance

37. What type of progress reporting is required for BEAD projects and when are they due?

Subrecipients will be required to submit *at a minimum* two semi-annual reports (twice a year) for performance periods January 1 through June 30, and July 1 through December 31.

38. When does a recipient have to begin speed tests for their constructed locations?

Subrecipients are required to begin conducting BEAD-funded network performance testing when one or more BSL(s) satisfy the following conditions:

- The BSL is included in the FCC location fabric.
- Service is available at the BSL.
- The service offered at the BSL has an active subscriber.
- The tested BEAD service was reported in the subgrantee's most recent FCC Broadband Data Collection (BDC) filing.

Annually thereafter, subrecipients are required to conduct performance testing on a random sampling of the BSLs that meet the conditions detailed in the NTIA [Performance Measures Policy Notice](#).

See [NTIA BEAD FAQs](#) section 11 for more details.

39. How many locations must a recipient speed test?

Section 3.2 of the [Performance Measures Policy Notice](#) details that:

“Subscribers are counted across all BEAD-funded projects of a subgrantee in a state or territory for each technology type, not separately for each BEAD project. Subgrantees with 50 or fewer active subscribers at BEAD locations for a committed speed tier and technology will test 5 locations (if there are 5 or fewer active subscribers, all active subscribers are tested); those with 51 through 500 active subscribers must test at least 10 percent of the total subscribed locations; if more than 500 subscribers exist in a sample population, only 50 locations must be tested. The sampled locations sharing the same technology and committed speed tier are referred to as a sample set.”

40. How does a subrecipient determine which locations to test?

Locations must be randomly selected from among the provider’s active subscribers in each committed speed tier within each funded technology.

Additionally, the sample set is to be drawn from the locations available for service with an as-of date seven months prior to the due date of the first semiannual report of the calendar year. For example, the semiannual report due on January 31, 2026, reflects the performance of locations reported to the FCC Broadband Data Collection (BDC) available as of June 30, 2025.

See [Performance Measures Policy Notice](#) Section 3 for details.

41. How often must a subrecipient conduct speed testing?

Subrecipients must test a random sample of their active subscribers at grant-supported customer locations annually and at the end of the Period of Performance.

42. What if the sampled speed tests do not meet the required threshold of 80 percent or more of locations meeting 80 percent of the committed speed and latency?

The Commission may require additional enhanced network performance testing in response to any non-complaint results and/or the Subrecipient will be required to improve the network until the minimum performance standards are met or up to the entire award will be forfeited.

Permitting and National Environmental Policy Act (NEPA) Review

43. What is the role of the Commission in the NEPA process? What is the role of a grant recipient in the NEPA Process?

NTIA appointed the eligible entity, Wisconsin, as a joint lead agency for administration of the BEAD program, which includes NEPA Review. Before the subrecipient can begin project implementation, the project must be determined to be NEPA compliant by NTIA. The PSC's primary role in NEPA review is to review and coordinate the information between the subrecipient and NTIA. PSC staff will gather, document, and preliminarily review environmental data to ultimately transmit to NTIA via the Environmental Screening and Permitting Tracking Tool (ESAPTT) with assistance from the subrecipients. Subrecipients will provide PSC with requested materials in the Environmental Impact and Documentation Screening (EIDS) Questionnaire and the Pre-Construction NEPA and Permitting Timeline to start the required environmental review and provide additional information upon request. The NEPA review is not complete until NTIA issues a Final NEPA Decision Memo. The PSC will provide the NTIA NEPA Decision Memo to the grant recipient.

The subrecipient's role is to prepare the materials requested in the EIDS Questionnaire.

In addition to the NEPA Review, an Endangered Species Act (16 U.S.C. § 1531, et seq; ESA) Section 7 consultation with the U.S. Fish and Wildlife Service (FWS) and a National Historic Preservation Act (54 U.S.C. 300101, et seq; NHPA) Section 106 consultation with the Wisconsin State Historic Preservation Office (SHPO) and interested Native American Tribes. As capacity is available, Commission staff will complete the Section 7 consultation and Section 106 consultation on behalf of the grant recipient to meet BEAD NEPA requirements. Additionally, while not part of the NTIA NEPA Review, PSC staff will be completing Wisconsin Department of Natural Resources (WDNR) state-level Endangered Resources Reviews on behalf of BEAD Awardees. As capacity is available, Commission staff will complete the state-level Endangered Resources Review on behalf of BEAD Awardees.

It is expected that BEAD projects may require additional information gathering to comply with ESA or the Wisconsin Endangered Resources Review (informal/formal consultation, additional mitigation measures, surveys, etc.), and/or NHPA (literature review, archaeological survey, formal consultation with interested Tribes, etc.). The PSC will direct BEAD Awardees when additional information is required.

44. If a recipient is experiencing a construction delay due to permitting issues, who should they contact?

Recipients should contact the WBO via email if they face any permitting issues at PSCBEADGrants@wisconsin.gov.

Note that PSC staff have corresponded with state and federal agencies regarding BEAD projects, and NTIA has held multiple permitting summits in preparation for the influx of permits that may come under federal review. If necessary, the PSC can facilitate a [Permitting Roundtable](#) between the recipient, the agency in question, the PSC, and NTIA.

45. My BEAD project is awarded \$0 in federal funds. Does NEPA still apply?

Yes. According to the [BEAD General Terms and Conditions \(Nov. 2025\)](#), the PSC must ensure that BEAD recipients comply with all applicable BEAD Program requirements via a Grant Agreement. By signing a Grant Agreement—even if a project was awarded \$0 in federal funds—the recipient agrees to comply with all BEAD program requirements, including NEPA.

46. NEPA review can be a time-consuming process. How are NTIA and the PSC working to address this known barrier?

NTIA has provided resources for recipients, which can you find here: <https://broadbandusa.ntia.gov/assistance/permitting>.

Particularly helpful for planning stages is [the Permitting and Environmental Information Application \(PEIA\)](#) mapping tool, designed to help federal broadband grant recipients and subgrantees identify and understand the types of permits they will need and plan routes for their potential broadband deployments. There is also a downloadable GIS project package available for PEIA, called the [ArcGIS Pro Permitting and Environmental Information Tool \(APPEIT\)](#). APPEIT allows users to overlay their planned project onto the environmental layers provided in PEIA. The package then generates a report to identify the potential permits needed for a project. APPEIT requires users to have a GIS License.

NTIA announced a set of broadband-specific categorical exclusions that may apply to certain projects, which would result in a quicker NEPA review. There are 47 categorical exclusions that could be applied to a project. A categorical exclusion is an outcome of NEPA; projects deemed categorically excluded still undergo a NEPA review. Furthermore, if a project – even one that qualifies for categorical exclusion - could impact a sensitive resource, NTIA and PSC may decide to conduct a more thorough environmental review in the form of an Environmental Assessment (EA). BEAD Categorical Exclusions can be seen in the Appendix of the following document: [Guidance on NTIA National Environmental Policy Act Compliance](#).

Additionally, NTIA implemented other guidance to make NEPA reviews more efficient, a summary of which can be reviewed [here](#). Specifically, NTIA:

- Developed [ESAPTT](#) for organized and efficient reviews for BEAD projects;
- For Low-Earth Orbit Satellite and Fixed Wireless projects, NTIA released [BEAD Guidance on NEPA and NHPA for LEO Satellite Service](#);
- Expanded the [Advisory Council for Historic Preservation \(ACHP\) Program Comment for Federal Communication Projects](#) to cover BEAD projects;
- Published the [FWS Section 7 Non-Federal Designation for Consultations and “No Effect” Memo](#); and
- Released [Tiered Environmental Assessment Guidance and Templates](#) to assist states and recipients in developing required environmental documents that do not qualify for Categorical Exclusion.

The Commission has dedicated staff to perform NEPA reviews and prepare NEPA documents before submitting them to NTIA for review and approval. To more efficiently gather necessary information and documents, the Commission developed an Environmental Information and Documentation Screening (EIDS) [Instructions + Resources](#) and [Questionnaire](#) that each awardee will be required to complete for each project (or, if applicable, NEPA Sub-Project). The packet is currently in Version 1, and the PSC reserves the ability to release subsequent versions as deemed necessary.

47. Does completing NEPA review exempt awardees from other federal, state or local-level permits or requirements?

No, awardees should be prepared to correspond with all appropriate federal, state and local permitting agencies before beginning project implementation. Even though the Commission does not hold permit authority over wetlands, waterways, stormwater management, state/county highways, state/federal/local lands, or coastal management zones, the Commission is working with other federal and state agencies to ensure that BEAD-funded projects are compliant with these regulations at the state and the federal level. While the recipient is responsible for ensuring all appropriate permits are obtained, the PSC can provide technical assistance as needed, including but not limited to [Permitting Roundtables](#).

There also may be county or municipality specific permits needed to complete BEAD projects. Check in early and often with the appropriate county and municipal officials to ensure permitting compliance.

48. What types of environmental impacts will be considered as part of the NEPA review process?

NTIA requires every project to consider floodplains (if applicable), wetlands, waterways, historic resources (including Tribal Historic Resources), and endangered resources. This list may change depending on the scope of the project, location, and surrounding environmental occurrences. The BEAD NEPA submission requirements are addressed in the EIDS [Instructions + Resources](#) and [Questionnaire](#).

49. Where can I learn more about NEPA for BEAD?

Subgrantees can use the following links to learn more about the NEPA process for BEAD:

- PSC's [BEAD Grant webpage](#) and [NEPA Webinar Playlist](#)
- [EIDS Instruction and Resources Version 2 \(March 2026\)](#)
- [EIDS Questionnaire Version 2 \(March 2026\)](#)
- [NTIA BEAD Program Webpage](#)
- [National Environmental Policy Act – Council on Environmental Quality](#)

Other BEAD Requirements

50. Does a subrecipient need to submit their required Cyber Security Risk Management Plan to the Commission?

Yes. This must be provided before Grant Agreement execution.

The plan must: (1) meet the [National Institute of Standards and Technology \(NIST\) Framework 2.0 for Improving Critical Infrastructure Cybersecurity](#); (2) be reevaluated and updated on a periodic basis and as events warrant; and (3) submitted to the Commission prior to execution of a Grant Agreement.

See page 70 of the BEAD NOFO for further details. [BEAD NOFO](#).

51. Does a subrecipient need to submit their required Supply Chain Risk Management (SCRM) Plan to the Commission?

Yes. This must be provided before Grant Agreement execution.

The SCRM plan must: (1) align with the [NIST IR 8276 documentation](#), [NIST 800-161 documentation](#), and other related SCRM guidance from NIST; (2) be reevaluated and updated on a periodic basis and as events warrant; and (3) submitted to the Commission prior to execution of a Grant Agreement. See page 70 of the BEAD NOFO for further details. [BEAD NOFO](#).

52. When does the proposed network plan that must be certified by a professional engineer need to be submitted?

A certification by a professional engineer must be submitted during onboarding and before a Grant Agreement is executed. Information included in a proposed network plan and that will be reviewed by a professional engineer for certification is the network design, diagram, project costs, build-out timeline and milestones for project implementation.

See page 74 of the [BEAD NOFO](#) for details, as well as the [conditional programmatic waiver](#) issued by NTIA which waives the requirement that prospective subgrantees also submit a “capital investment schedule evidencing complete build-out and the initiation of service within four years of the date on which the entity receives the subgrant”.

53. Will audited financial statements of either publicly-traded or private parent companies be accepted if they meet all other requirements?

Yes.

BEAD Grant Agreement 9.2.3. “Audited financial statements of a **publicly traded parent company** may be sufficient to meet the BEAD Program audit requirements if the statements meet all relevant requirements in the BEAD NOFO, 2 CFR Part 200, and the BEAD General Terms and Conditions” was based on NTIA BEAD FAQs v18.

Later versions of NTIA BEAD FAQs changed to “1.23 (Updated March 2026) Can subgrantees submit audited financial statements at the parent-company level? Yes, audited financial statements **of a parent company** may be sufficient to meet the BEAD Program’s audit requirements if the statements meet all relevant requirements in the BEAD NOFO, 2 CFR Part 200, and the BEAD General Terms and Conditions.” [BEAD Frequently Asked Questions and Answers - Version 20](#).