

# ***Request for Applications***

**For**

## ***Nebraska Broadband Equity, Access, & Deployment (NBEAD) Last-mile Broadband Deployment Project Grants***

***2026 Round***

**Date of Issuance:**

**June 25, 2026**

**2026 Project Applications Due:**

**July 16, 2026**

To participate, you ***must*** request an Authentication Code from [nbo.grants@nebraska.gov](mailto:nbo.grants@nebraska.gov) – see page 2 for details

Applications must be submitted to  
<https://apply.broadband.nebraska.gov/submit>

# NEBRASKA

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**BROADBAND OFFICE**

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## FUNDING PRIORITIES

The Nebraska Broadband Office (NBO) announces the availability of Nebraska Broadband Equity, Access, and Deployment (NBEAD) funding to support Last-mile Broadband Deployment Projects. Funding was provided to NBO under Title I of the Infrastructure Investments and Jobs Act (IIJA), the Broadband Equity, Access, and Deployment (BEAD) program. NBO serves as a pass-through entity for BEAD funding administered by the National Telecommunications and Information Administration (NTIA). Therefore, references below to “federal funding” or “federal awards” may be read as applicable to NBEAD subgrants.

NBO invites eligible entities to submit applications targeting Nebraska’s Defined Project Areas (DPAs), described at <https://broadband.nebraska.gov>.

NBEAD funding is required to prioritize:

1. Unserved Broadband Serviceable Locations (BSLs): BSLs that the Broadband DATA Maps show as:
  - a. Having no access to broadband service, or
  - b. Lacking access to reliable broadband service offered with
    - i. a speed of not less than 25 Mbps for downloads; and
    - ii. a speed of not less than 3 Mbps for uploads; and
    - iii. latency less than or equal to 100 milliseconds
2. Underserved BSLs:
  - a. Are not unserved
  - b. Are shown on the Broadband DATA Maps as lacking access to Reliable Broadband Service offered with:
    - i. a speed of not less than 100 Mbps for downloads; and
    - ii. a speed of not less than 20 Mbps for uploads; and
    - iii. latency less than or equal to 100 milliseconds.
3. Community Anchor Institutions (CAIs): an entity such as a school, library, health clinic, health center, hospital or other medical providers, 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.

Applications are requested to support projects that will ensure a minimum of 100 Megabits per second (Mbps) download/20 Mbps upload with latency of no more than 100 milliseconds (ms) for unserved and underserved BSLs; and that can easily scale speeds over time to support evolving connectivity needs of households and businesses and supports the deployment of 5G, successor wireless technologies, and other advanced services. Projects that address CAIs must ensure speeds to those entities of not less than 1 Gigabit per second (Gbps) for downloads, 1 Gbps for uploads and latency of not more than 100 ms.

The 2026 Round includes Community Anchor Institutions (CAIs) as well as Broadband Serviceable Locations (BSLs). Applications may be submitted to request funding to support deployment to BSLs, deployment to CAIs, or deployment to both in a given DPA. Applications may also be submitted for projects that will target one or more CAIs that are not in a DPA.

NTIA has calculated a cap on funding available per Nebraska BSL or CAI of \$30,000.00. There is

no indication that the cap will be adjusted either up or down. Applicants should ensure their budgets do not exceed \$29,999.00, on average, per BSL or CAI.

Applicants may propose a single technology or a combination of technologies. For each chosen BSL and CAI, you must specify the chosen technology(ies) in your application. Technologies cannot be changed following subgrant execution.

The process used to subgrant funding to NBEAD projects must be competitive and is designed to maximize the public benefits achieved.

## AMENDMENTS TO THIS RFA

NBO reserves the right to amend the RFA at any time. In the event NBO decides to amend, add to, or delete any part of this RFA, a written amendment will be posted at <https://broadband.nebraska.gov>. Potential applicants are advised to check this website periodically for possible amendments to this RFA.

## ELIGIBILITY

This funding opportunity is limited to organizations that qualified as Approved Applicants for NBEAD funding under one of the 2025 Requests for Applications, listed at <https://broadband.nebraska.gov>.

If your organization is not on the list of Approved Applicants, you are not eligible to participate in the 2026 Round.

### Authentication Codes

If you are an approved Applicant as defined above and interested in applying for NBEAD funding under the 2026 Round RFA, you will need an Authentication Code from NBO. Applications submitted without the correct Authentication Code will not be reviewed.

To access your Authentication Code, send an email to [nbo.grants@nebraska.gov](mailto:nbo.grants@nebraska.gov) with the following information:

- Applicant Unique Entity Identifier (UEI);
- Registered name associated with your UEI record at SAM.gov;
- Name of the person who submitted your OA, in either Round 1, the BoB Round, or the CAI Round; and
- Name and email address of the person who will submit the PA(s) on behalf of your organization.

NBO staff will email your Authentication Code to you and the person who will submit PAs on behalf of your organization within 24 hours of receipt of your request. You will be required to enter this Authentication Code when prompted as part of your PA.

## TYPES OF NBEAD PROJECTS

Applications for NBEAD funding may be submitted for Priority Projects. The *BEAD Restructuring Policy Notice* (RPN) published on June 6, 2025, included an official definition for Priority Projects, as determined by NTIA. The RPN set the definition of *Priority Project* as “those that provide broadband service at speeds of no less than 100 Mbps for downloads and 20 Mbps for uploads; have a latency less than or equal to 100 ms; 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 *BEAD Frequently Asked Questions Version 12* offered additional detail about the standards of the RPN definition, particularly as they relate to scalability. These standards enabled NBO to consider characteristics such as the number of people or BSLs in the proposed project area that would make certain applications nonpriority due to lack of scalability. Additionally, NBO is able to consider the natural and physical features of a project area, such as tree coverage, to assess whether certain applications should be prioritized over others.

NBO has examined the data and the literature and consulted with professional engineers to update the definition of *Priority Project*. Accordingly, NBO has organized NBEAD DPAs into three tiers:

**Tier 1:** those that provide broadband service at speeds of no less than 100 Mbps for downloads and 20 Mbps for uploads; have a latency less than or equal to 100 ms; 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; and possess a BSL density cluster of six or more per square mile and/or one or more CAIs; and include statistically high proportions of locations with obstructions or topography challenges. Tier 1 DPAs have been determined to not be conducive to Satellite or Fixed Wireless technologies.

**Tier 2:** those that provide broadband service at speeds of no less than 100 Mbps for downloads and 20 Mbps for uploads; have a latency less than or equal to 100 ms; 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; and possess a BSL density cluster of six or more within 11 square miles. Tier 2 DPAs have been determined to not be conducive to Satellite technology.

**Tier 3:** those that provide broadband service at speeds of no less than 100 Mbps for downloads and 20 Mbps for uploads; have a latency less than or equal to 100 ms; 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; and do not possess a BSL density cluster of greater than six per square mile and that do not include statistically high proportions of locations with obstructions or topography challenges. Tier 3 DPAs have been determined to be conducive to all technologies.

For the 2026 Round, NBO has optimized the remaining DPAs, resulting in the final field of 1,710 BSLs and 176 CAIs. The DPAs for which funding is available via this RFA fall into the tiers as follows:

DPA	Tier	BSLs	CAIs	DPA	Tier	BSLs	CAIs
A1	2	16	0	H2	1	107	3
B1	1	13	0	HC1	2	26	0
B2	2	17	0	I1	2	13	0
C1	1	146	0	I2	1	38	4
C2	1	119	0	J1	2	50	0
D1	1	30	0	J2	1	33	0
E1	2	30	0	K1	1	8	6
E2	2	26	0	K2	2	10	0
E3	1	33	0	K3	1	42	2
E4	2	46	0	K4	1	91	1
E5	1	18	0	L1	1	18	0
F1	2	46	0	L2	2	12	0
F2	1	11	0	M1	1	191	5
F3	1	26	0	M2	2	17	0
F4	1	74	0	M3	1	130	3
G1	1	29	6	TR1	3	4	0
G2	2	31	0	TR2	3	5	0
H1	2	38	0	Z1	3	166	0

There are 146 additional CAIs targeted for NBEAD funding that do not fall within one of the existing DPAs. The minimum technology requirement for CAIs, as noted above, is 1 Gbps/1 Gbps and latency of no more than 100 ms, making projects that target these locations Priority and Tier 1.

## NBEAD STAGES

The NBEAD program will be delivered in six stages.

Stage 1: Organizational Applications (OAs)

Stage 2: Project Applications (PAs)

Stage 3: Documents & Technical Assistance (TA)

Stage 4: Reporting & Reimbursement

Stage 5: Monitoring

Stage 6: Closeout

### Stage 1: Organizational Applications

The NBEAD application process was originally split into two stages. The first was Organizational Applications (OAs), which focused on pieces that would be common across all NBEAD applications from a given organization, including general and contact information, experience with federal and state funding, financial standing, compliance with federal and state law, cybersecurity and supply chain risk management, and ownership.

OAs were collected via three RFA rounds in 2025: Round 1, the BoB Round, and the CAI Round. Successful applicants were added to NBO's list of Approved Applicants. The representations and certifications submitted in each applicant's OA are incorporated into the 2026 Round RFA. Any necessary updates to information collected via the previous OA process will be completed with NBEAD reporting and monitoring.

**If your organization appears on the Approved Applicants list on NBO's website, <https://broadband.nebraska.gov>, you are eligible to apply for NBEAD funding.** You will *not* need to submit a new OA. NBO is not collecting new OAs during the 2026 Round.

If your organization is not on the list of Approved Applicants, you are not eligible to participate in the 2026 Round.

### **Stage 2: Project Applications**

The second stage of the NBEAD application process is Project Applications (PAs), which are specific to a single DPA. PAs will address the Applicant's plans specific to service to be delivered, compliance with laws, and budget.

NBO has a limited window of time in which to collect, score, and provisionally award project funding, then execute subgrants, under the 2026 Round. Therefore, we are condensing timelines where possible, which includes the following:

- PA requirements will include written acceptance of the NBEAD Terms & Conditions (T&Cs), including insurance requirements. There are two versions of the T&Cs, one each for LEO and non-LEO projects, so applicants will need to ensure they sign and upload the correct version. These documents are not subject to negotiation either during or after the 2026 Round.
- PAs will also include collection of the Protecting from Defaults (PFD) Certification. Per the November 2025 *BEAD General Terms & Conditions* from NTIA, subgrantees must submit the PFD(s) to cover all NBEAD-funded projects. All Applicants, regardless of whether they were awarded NBEAD funding in 2025, will need to complete and submit a PFD to cover subgrants awarded as a result of this RFA. The content of the PFD is the same as was used previously, except for the language about projects covered by the document.

Copies of the T&Cs and PFD Certification documents are available for download, completion, and submission with applications at NBO's website, <https://broadband.nebraska.gov>.

Please note that there are some documents that will have to be collected after provisional awards are made but before subgrant execution, which will leave a short window for collection and submission:

- ACORD statements compliant with the insurance requirements in the T&Cs for the funded project type.
- ILOC or performance bond meeting requirements as described in Attachment 2 to this RFA.
- For DPAs TR1 and TR2, Tribal Consent documentation.
- Cybersecurity and Supply Chain Risk Management plans, if not submitted previously.
- Audited financial statements, if not submitted previously.

**2026 Round PAs must be submitted to NBO via the NBEAD portal, <https://apply.broadband.nebraska.gov/submit>, by 11:59 pm, Central Time on July 16, 2026. Late PAs or those that target more than one of Nebraska's DPAs will not be considered for funding.**

The NBEAD portal will automatically acknowledge receipt of your PA via email to the contact named in the PA. There will be no opportunities for submission of missing documents or curing during this process, so NBO strongly encourages applicants to ensure they submit all required information into the NBEAD portal by the deadline noted above. Incomplete PAs will not be scored and will be rejected.

Questions about PAs must be submitted in writing to [nbo.grants@nebraska.gov](mailto:nbo.grants@nebraska.gov). Responses to questions will be posted in writing in the FAQs document at <https://broadband.nebraska.gov> as soon as possible. Please note that answers may not be available before the PA(s) must be submitted. The applicable FAQs generated from the previous rounds of PAs have been compiled and updated and are available for viewing and download at <https://broadband.nebraska.gov>. NBO recommends that applicants check the existing FAQs for assistance with their questions, as NBO may not be able to timely respond to newly submitted questions.

**To avoid any actual or perceived collusion, fraud, or abuse, NBO representatives will not respond to questions outside of this process,** nor will any inadvertent answers be binding on NBO. In no case shall verbal communications override written communications. Only written answers issued from [nbo.grants@nebraska.gov](mailto:nbo.grants@nebraska.gov) or posted to the NBEAD FAQ's document at NBO's website, <https://broadband.nebraska.gov/>, will be binding on NBO. Attempts to circumvent this process may result in disqualification from NBEAD funding.

NBO staff may continue working with subgrantees on existing projects during the 2026 Round process. However, to conduct the process fairly and ensure consistent treatment of all applicants, NBO staff must limit discussions to those existing projects and not the 2026 Round.

PA requirements are detailed in Attachment 1.

### **Stage 3: Documents & Technical Assistance**

Once subgrants are approved by NTIA and announced by NBO, the constraints to communication between NBO staff and Subgrantees will be ended. Beginning at this point, regular and ongoing communication will be encouraged and supported by NBO.

Also at this point, NBO will immediately begin work with successful applicants to collect outstanding items such as ACORD statements and ILOC documentation. These items must be in place prior to execution of a subgrant.

Formal and ongoing technical assistance will also begin with Stage 3. An initial technical assistance meeting with NBO staff will be scheduled and details posted to NBO's website (<https://broadband.nebraska.gov/>). This meeting will provide an opportunity for interaction among and between NBO and Subgrantee staff, address some broad oversight elements, and include time for questions and answers.

A schedule of subsequent technical assistance meetings will be posted to NBO's website (<https://broadband.nebraska.gov/>). Agendas for these meetings will include programmatic updates and opportunities for questions and answers.

Copies of the subgrant and related documents are available at NBO's website, <https://broadband.nebraska.gov/>.

#### **Stage 4: Reporting & Reimbursement**

Stage 4 will include procedures and processes for timely submission of reports from Subgrantees and prompt reimbursement of costs by NBO. Reimbursement requests will include narrative progress and budget reports and will be submitted to NBO quarterly. NBO staff will assess the reports for completeness and reasonableness in the context of the project and either return them to the Subgrantee with questions or forward them with payment approval recommendations.

Once reports are determined to be complete and reasonable within the context of the project, payment approvals will be processed in the most expeditious manner available. In accordance with the Nebraska Prompt Payment Act, [Neb. Rev. Stat. § 81-2401](#) et seq. NBO has 45 days to reimburse Subgrantees once NBO receives a complete, accurate, and appropriate request.

General reporting and reimbursement requirements are provided in Attachment 3.

#### **Stage 5: Monitoring**

Stage 5 will run concurrently with Stage 4, and will comprise financial, compliance, and performance monitoring efforts. The goal of Stage 5 is not to catch anyone doing anything wrong, but to ensure the rules are followed and projects progress as planned.

NBO is required to monitor NBEAD projects to ensure progress toward milestones; compliance with federal, state, local, and tribal law; and appropriate use of NBEAD funds. A variety of methods may be used to monitor projects, which will include the following:

- a. Performance monitoring: progress toward goals of the project – is the Subgrantee delivering the project as approved, within the approved timeline? If there have been variations, has that information been communicated to NBO staff and appropriate approvals secured? Has technical assistance been requested when needed?
- b. Financial monitoring: use of funds within the requirements of the NBEAD program – has the Subgrantee used the funds appropriately, within the constraints of this RFA, their approved application documents, and the subgrant documents? If there have been variations, have they been communicated to NBO staff and appropriate approvals secured, in writing?
- c. Compliance monitoring: meeting federal and state standards – is the Subgrantee and its project compliant with relevant federal, state, local, and tribal law, as applicable, including but not limited to [Build America Buy America](#), the [National Environmental Policy Act](#), and [2 CFR 200](#)?

NBO will also monitor subgrants for common fraud schemes including but not limited to false claims for materials and labor, bribes related to the acquisition of materials and labor, product substitution, mismarking or mislabeling on products and materials, time and materials overcharging, and duplication of benefits.

Subgrantee monitoring must be done at least once per subgrant per project year but may be done more frequently. Details about the timing of requirements for monitoring will be shared with Subgrantees at the beginning of Stage 5.

### **Stage 6: Closeout & Federal Interest Period**

Stage 6 includes closeout and completion reporting, final monitoring, assessment of network capabilities, implementing plans for ongoing monitoring during the federal interest period, and assurance of commencement of service delivery to end users. For projects that fail to meet requirements, this phase may also include clawbacks and/or other penalties.

General information about monitoring during the 10-year federal interest period is included in Attachment 3. Please note that the 10-year federal interest period applies to all NBEAD subgrants, except for those that involve LEO technology.

## **PERIOD OF PERFORMANCE & FEDERAL INTEREST PERIOD**

Subgrantees that receive NBEAD funds for network deployment must deploy the planned broadband network and begin providing services to each customer who desires broadband service within the funded DPA not later than four (4) years after the date of execution of the subgrant.

For non-LEO-based projects, an extension of up to one (1) year may be requested if (a) the subgrantee has a specific plan for use of the grant funds, with project completion expected by a specific date not more than one year after the four-year deadline; (b) the construction project is underway; or (c) extenuating circumstances require an extension of time to allow the project to be completed. Extensions must be approved, in writing, by NBO and/or NTIA. NBO does not plan to request extensions without proof of substantive need.

The period of performance and funding period for the subgrants awarded under this competitive RFA will begin upon execution of the subgrant, defined as the date the final signature is appended to the subgrant document. For LEO-based subgrants, the period of performance will end ten (10) years from the execution of the subgrant. For non-LEO projects, the period of performance and funding period will end four (4) years from its commencement and will be followed by a 10-year federal interest period.

## **SUBMISSION DEADLINES & METHOD**

PAs that fulfill all mandatory requirements will be reviewed and scored. NBO reserves the right to waive any deviations or errors that it determines are not material, do not invalidate the legitimacy of the application, and do not improve the applicant's competitive position.

**2026 Round PAs must be submitted into the NBEAD portal,**  
**<https://apply.broadband.nebraska.gov/submit>, by 11:59 pm, Central Time on July 16, 2026.**

PAs received after this deadline will be considered late and will not be scored or funded. Additions or corrections will not be accepted after the submission deadline. NBO is not responsible for applications that are late due to applicant technology inadequacies or any other

reasons. All versions of the application, including attachments, become the property of NBO upon receipt and will not be returned to the applicant.

## **CONFIDENTIAL & PROPRIETARY INFORMATION**

NBO asserts that information provided to NBO is subject to the provisions of the Nebraska Public Records Act ([Neb. Rev. Stat. §84-712](#) et seq.). NBO expects that, to the maximum extent possible, the entity submitting a PA will use “non-protected” information as the basis for statements in the documents so that the documents and the information set out in the documents may be reviewed by the public. NBO reserves the right to disclose any document or information in the PA pursuant to an applicable request for access to public records without providing the entity an opportunity to review, edit, or redact such document. An entity submitting information to NBO in a PA understands that the entity will be solely responsible for promptly defending its claims of confidentiality in response to a public records request, or request for information submitted to the State. Such entity will use its best efforts to promptly respond to State notice of a request for documents or information related to a PA.

If an applicant claims information should be excluded from the public record, the applicant must: 1) identify on the PA which responses are alleged to contain proprietary or trade secret information by indicating “Confidential and Proprietary” in the space for a response to the relevant question; and 2) at the end of the PA, upload a separate document with the words “PROPRIETARY INFORMATION” in the file name and header of the document, which contains a) the claimed proprietary or trade secret information with the corresponding PA response number; b) a detailed explanation of the legal basis for the claimed protection from disclosure, pursuant to State or federal public records statutes or laws; c) an explanation of how the release of the proprietary or trade secret information would give a business advantage to business competitor(s); and d) an explanation of how business competitor(s) will gain an actual business advantage by disclosure of information. The mere assertion that information is proprietary or trade secret, or that a speculative business advantage might be gained, is not sufficient (See [Nebraska Attorney General Opinion No. 92068, April 27, 1992](#)).

The State has the right, but not the duty, to determine, in its discretion, if the interests served by nondisclosure outweighs any public purpose served by disclosure (See [Neb. Rev. Stat. § 84-712.05\(3\)](#)). Absent a State determination that information is proprietary or trade secret, the State will consider all information a public record subject to release regardless of any assertion that the information is proprietary or trade secret. If the State receives a request from the public for the claimed proprietary or trade secret information, State will notify the applicant of the request. The prospective subgrantee shall respond to the State within two (2) days with an estimated time frame by which it can fully respond to and defend its position that the requested information is proprietary or trade secret. It will be the applicant’s responsibility to defend its asserted interest in non-disclosure. The State retains the right, but not the duty, to make its own determination as to whether information should be protected from disclosure.

## USE OF FUNDS

NBEAD funds may be used to supplement (add to) but not supplant (replace) other funds that would otherwise be used for the same purpose (i.e., buildout of a broadband network). All funded organizations must be good stewards of funds awarded.

NBO is able to offer up to \$30,000 in NBEAD funding per BSL or CAI. This limit was calculated and set for Nebraska BSLs by NTIA. Applications that are submitted with average per-BSL and/or average per-CAI costs greater than \$29,999.00 will not be considered for funding.

Subgrantees must communicate well with federal, state, local, and Tribal partners to ensure that deployments proceed as expected and that activities are designed and implemented in ways that most benefit the communities they are designed to serve.

Subgrantees are to expend funds in accordance with the approved line-item budget. If cumulative budget changes exceed 10% of the total award or would add or eliminate a line item, the Subgrantee must request, in writing, a budget or a project plan revision, depending on what needs to be changed, prior to implementation of proposed changes. It is to the discretion of NBO to approve the requested revision(s). NBO will provide written notice of approval or disapproval of the request within thirty (30) days of receipt.

Subgrantees must submit to NBO timely, accurate, and complete reports (see Attachment 3 for general requirements) using the forms, format, and timeline provided by NBO. This includes submission of all costs for which reimbursement is requested for a quarter. Subgrantees are encouraged to submit reports to NBO in a timely manner to ensure prompt payment of expenses and cash flow maintenance.

As was done under previous RFA rounds, NBO will issue traditional subgrants, not fixed amount awards, for NBEAD-funded projects. This point is not negotiable.

Subgrantees are required to comply with NBO's performance and subrecipient monitoring activities and schedule, which includes provision of source documentation for reimbursement requests when requested by NBO, participation in site visits, and regular communications. The documentation requested may include payroll records, receipts, time studies, or other documents to fully justify the expenses claimed on the quarterly budget report. Submission of source documents may affect quarterly reimbursement, so Subgrantees are advised to submit the documents in a timely manner.

Applicants should include in their budgets all costs necessary to deliver the project. Examples of completed budget forms for both LEO and non-LEO projects are available for reference at <https://broadband.nebraska.gov>.

NBEAD funding may only be used for activities outlined in the approved application, and funds must be used in accordance with the approved budget. NBEAD funding may be used for the following costs:

1. Construction, improvement, and/or acquisition of facilities and telecommunications equipment required to provide qualifying broadband service, including infrastructure for

backhaul, middle- and last-mile networks, and multi-tenant buildings, up to the demarcation point.

2. Long-term leases (for terms greater than one year) of facilities required to provide qualifying broadband service, including infeasible right-of-use (IRU) agreements.
3. Deployment of internet and Wi-Fi infrastructure within an eligible multi-family residential building.
4. Engineering design, permitting, and work related to environmental, historical, and cultural reviews.
5. Personnel costs, including salaries and fringe benefits for staff and consultants providing services directly connected to the implementation of the NBEAD Program (such as project managers, program directors, and subject matter experts).
6. Network software upgrades, including, but not limited to, cybersecurity solutions.
7. Training for cybersecurity professionals who will be working on NBEAD-funded networks.
8. For projects targeting unserved BSLs, Middle Mile Infrastructure in or through any area required to reach interconnection points or otherwise to ensure the technical feasibility and financial sustainability of a project may be included.
9. For LEO-based projects, all necessary consumer premises equipment (CPE) must be provided at no cost as part of the standard installation for each new subscriber. CPE costs may be charged to your NBEAD project.

All costs must meet necessary, reasonable, allowable, and allocable standards. Per [2 CFR 200.405](#), a cost is allocable to a NBEAD subgrant if it is assignable to that subgrant in accordance with the relative benefits received. This standard is met if the cost satisfies any of the following criteria:

1. Incurred specifically for the subgrant;
2. Benefits both the subgrant and other work of the subgrantee and can be distributed in proportions that may be approximated using reasonable methods; or
3. Is necessary to the overall operation of the subgrantee and is assignable in part to the subgrant in accordance with the cost principles at [2 CFR 200, Subpart E](#).

To be considered allowable, costs must meet the following ([2 CFR 200.403](#)):

1. Be necessary and reasonable for the performance of the subgrant and be allocable thereto under the principles in [2 CFR Part 200, Subpart E](#).
2. Conform to any limitations or exclusions set forth in [2 CFR Part 200, Subpart E](#) or in the subgrant as to types or amount of cost items.
3. Be consistent with policies and procedures that apply uniformly to both federally financed and other activities of the applicant.
4. Be accorded consistent treatment. A cost may not be assigned to a subgrant as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the subgrant as an indirect cost.
5. Be determined in accordance with generally accepted accounting principles (GAAP), except for state and local governments and Indian Tribes only as otherwise provided for in [2 CFR Part 200](#).
6. Not be included as a cost or used to meet cost-sharing or matching requirements of any other federally financed program in either the current or a prior period.
7. Be adequately documented.

A cost is reasonable if it does not exceed an amount that a prudent person would incur under the circumstances prevailing when the decision was made to incur the cost ([2 CFR 200.404](#)). To determine reasonableness, the following should be considered:

1. Whether the cost is generally recognized as ordinary and necessary for the subgrantee's operation or the proper and efficient performance of the subgrant;
2. The restraints or requirements imposed by such factors as sound business practices; arm's-length bargaining; federal, state, local, tribal, and other laws and regulations; and terms and conditions of the subgrant;
3. Market prices for comparable costs for the geographic area;
4. Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the subgrantee, its employees, the public at large, and the federal government; and
5. Whether the cost represents a deviation from the subgrantee's established written policies and procedures for incurring costs.

**Build America Buy America (BABA) Act.** NBEAD projects are subject to Build America, Buy America (BABA) Act requirements. For projects funded by NBEAD, the following requirements must be met:

- All iron and steel used in the project are produced in the US;
- All manufactured products used in the project are produced in the US; and
- All construction materials are manufactured in the US.

BABA applies to:

- All iron and steel used in the project: items that consist wholly or predominantly of iron or steel or a combination of both
- Manufactured products that have been processed into a specific form or shape or combined with other items to create a product with different properties than those of its components
- Section 70917(c) materials including cement, stone, sand, and aggregate binding agents
- Construction materials including non-ferrous metals, plastic and polymer-based products, glass, fiber optic cable, optical fiber, lumber, drywall, and engineered wood.

BABA does not apply to tools, equipment, and supplies such as temporary scaffolding used in but not an integral part of the project. It also does not apply to items such as chairs and desks that are used at or within the project but are neither an integral part of nor affixed to the project.

BABA compliance must be whole, not piecemealed: if one component is not compliant, the entire project is not compliant, regardless of funding types and/or braiding of funding from multiple sources.

Items purchased with matching funds are subject to the same BABA requirements. In addition, BABA requirements pass through from NBO to NBEAD subgrantees and to their subgrantees and contractors.

Subgrantees are primarily responsible for determining whether a product is subject to BABA, NBO retains oversight responsibility within the BEAD structure.

Failure to provide BABA compliance documentation may result in removing and replacing improperly purchased foreign-manufactured goods, reducing the amount of an award, or

withholding future funds and terminating an award. In cases of fraud, it could result in criminal investigation and prosecution.

### **Prohibited Costs**

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Advance payments are not allowed under NBEAD funding.

Pre-award costs are not allowed under NBEAD funding. In addition, the following costs are specifically prohibited under NBEAD funding:

1. Covered communications equipment or services under the Secure and Trusted Communications Networks Act. Subgrantees (including contractors and subcontractors of subgrantees) may not use grant funds received under the NBEAD Program to purchase or support any covered communications equipment or service (as defined in Section 9 of the Secure and Trusted Communications Networks Act of 2019 ([47 USC § 1608](#))).
2. Profit and fees. A profit, fee, or other incremental charge above actual cost incurred by the Subgrantee is not an allowable cost under this program. A profit, fee, or other incremental charge cannot be added to the actual allowable cost of the service or asset being constructed, purchased, or leased under this program. This prohibition does not apply to user or subscriber fees (which include a profit margin) charged for subsequent broadband service delivery.
3. Support for or opposition of collective bargaining. A Subgrantee may not use grant funds, whether directly or indirectly, to support or oppose collective bargaining.
4. Costs for efforts related to workforce development, including registered apprenticeships and pre-apprenticeships, and community college and/or vocational training for broadband-related occupations to support deployment, maintenance, and upgrades.

### **Match Requirements**

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Matching funds of not less than 25% of project costs will be required for most NBEAD projects. Matching contributions demonstrate commitment to a particular project and minimize grant funding outlay, extend the reach of the program funding, and help to ensure that every unserved location and underserved location in Nebraska has access to reliable, affordable, high-speed internet.

Generally, funds from other federal programs may not be used as matching funds. However, matching funds for the NBEAD program, per the federal legislation, may come from a federal regional commission or authority or from funds that were provided to a subgrantee for the purpose of deploying broadband service under the Families First Coronavirus Response Act ([Public Law 116-127; 134 Stat. 178](#)); the CARES Act ([Public Law 116-136; 134 Stat. 281](#)), the Consolidated Appropriations Act, 2021 ([Public Law 116-260; 134 Stat. 1182](#)); or the American Rescue Plan of 2021 ([Public Law 117-2; 135 Stat. 4](#)), to the extent permitted by those laws. Please note that, if federal sources are used as match for NBEAD, the project will also have to comply with those federal programs' requirements. Loan funding issued through a federal agency, such as through the USDA ReConnect Program, may also be used as match.

A matching contribution may be provided by the subgrantee, a unit of local government, a utility company, a cooperative, a nonprofit or philanthropic organization, a for-profit company, a regional planning or governmental organization, a federal regional commission or authority, or any combination thereof.

Match may be provided in either cash or in-kind contributions. All match contributions must be made consistent with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards set forth at [2 CFR 200](#). Match contributions must meet the same allowable, allocable, necessary, and reasonable standards as any other project expense.

In-kind match includes non-cash items donated to the project by the Subgrantee or third parties. The amount of match donated requires calculating the value of property, equipment, goods, or services contributed by others to your project.

Match contributions may include:

- Wages and salaries plus fringe benefits for project-dedicated employees,
- Office or other supplies,
- Computer hardware and software,
- Use of facilities,
- Waivers of fees associated with access to rights of way, pole attachments, conduits, easements, or access to other types of infrastructure,
- Travel to and from site locations: hotel, per diem, mileage, etc.,
- Signage or safety equipment required at site locations,
- Leased vehicles dedicated to the project and related mileage,
- Cost of depreciation on owned capital investment equipment dedicated to the project,
- Licensing and expenses related to project areas and NEPA and permitting,
- Hiring, training, and safety equipment costs dedicated to the project,
- Related professional services, contractors, legal services, accounting, and audit expenses,
- Taxes on purchases related to the project,
- Land surveying expenses related to the project,
- Loans and insurance expenses dedicated to the project,
- Marketing and advertising directly related to the project and reaching potential end users.

It is also possible to include in match costs for repair and maintenance of equipment directly related to the project. Please note that these costs are subject to substantive documentation requirements, including itemized records of all maintenance and repair costs including dates, descriptions, and receipts in addition to information about whether the work is routine upkeep or capital improvement.

- a. Routine maintenance and repairs such as lubrication, small part replacement, and minor fixes are generally allowable.
- b. Major upgrades, replacements, or repairs that significantly extend the equipment's life or increase its value become capital costs and must be approved and accounted for separately.

According to the *BEAD Frequently Asked Questions and Answers Version 21*, existing infrastructure may be used as match for an NBEAD-funded project, but only under the following conditions:

- The existing infrastructure must be necessary for completion of the NBEAD project;
- Only the portion of existing infrastructure that is directly attributable to and used for the NBEAD project may be claimed as match;

- Contributions must be based on a clearly defined pro-rated share of the contributed infrastructure; and
- Contributions must adhere to all programmatic requirements, including [2 CFR 200.306](#).

Please note that existing infrastructure contributed as in-kind match may be subject to NEPA and Section 106 requirements. Such infrastructure is not subject to NEPA and Section 106 requirements if:

- It was built prior to subgrantee selection,
- It was planned, funded, and executed independent of any proposed NBEAD project (e.g., previously planned capital improvements), and
- It was not deployed for the purpose of furthering the NBEAD project.

Existing infrastructure contributed as in-kind match is subject to NEPA and Section 106 requirements and must be included in the Environmental Screening and Permitting Tracking Tool (ESAPTT) tool if:

- The in-kind match contribution was built for the purpose of making the NBEAD-funded action viable; and/or
- It constitutes a connected action, as defined in the [Guidance on NTIA National Environmental Policy Act Compliance](#).

Per the *BEAD Restructuring Policy Notice* (RPN) and subsequent NTIA guidance, LEO-based projects are subject to the same match requirements and rules. They will be required to define their match plans in application documents.

**Match Waivers.** For the 2026 Round, all NTIA-designated high-cost BSLs have been placed into a single DPA: HC1. For this DPA only, match commitments of less than 25% may be approved. NTIA has announced that they do not intend to approve match waivers for any other projects, so Applicants should not propose match of less than 25% for any DPAs except HC1.

**Reimbursement Requests & Match.** Subgrantees have the option of providing the full match amount at the beginning of the project, but it is not required. NBO is able to negotiate the timing of the reimbursements of match to project costs.

### **Program Income**

NTIA has issued a waiver specific to program income under BEAD-funded infrastructure projects: NBEAD subgrantees may retain program income, such as income derived from the servicing and use of supported networks and connections (e.g., wholesale revenues, end-user subscription revenues, etc.), for profit. However, profit and fees are **not** allowable costs, so project budgets may not include profit, fees, or similar charges.

Subgrantees will not be required to track and report program income to NBO.

### **Contingency Funds**

Per [2 CFR 200.433](#) and within certain limitations, contingency funds are allowable costs for construction projects, including NBEAD-funded projects. Contingency amounts must be estimated using broadly accepted cost estimating methodologies, specified in the budget documentation, and accepted by NBO. For actual costs incurred to be allowable, they must comply with the cost principles and other requirements (see [2 CFR 200.300](#) and [200.403](#)), be

necessary and reasonable for proper and efficient accomplishment of project or program objectives, and be verifiable from the subgrantee's records.

Contingency amounts for major project scope changes, unforeseen risks, or extraordinary events must not be included in the budget. Payments to a subgrantee's "contingency reserve" or any similar payment made for events the occurrence of which cannot be foretold with certainty as to the time or intensity, or with an assurance of their happening, are not allowable.

### **Property & Equipment for Non-LEO Subgrants**

Application budgets must include identification of any real property and equipment that is planned to be acquired with NBEAD funding. This information will be transferred to subgrant agreement documents to ensure compliance with [2 CFR 200.316](#).

In accordance with [2 CFR 200.316](#), any real property, equipment, or intangible property acquired or improved with a federal award must be held in trust by the Subgrantee as trustee for the beneficiaries of the project, other eligible activity, or program under which the property was acquired or improved. This trust relationship exists throughout the duration of the property's estimated useful life. During this time, the federal government retains an undivided, equitable reversionary interest in the property (federal interest).

Depreciation of real property, equipment, and intangible property shall be in accordance with [2 CFR 200.436](#).

Subgrantees must follow [2 CFR 200.313](#)(c) through (e), which requires that:

1. Equipment, including replacement equipment, be used in the program or project for which it was acquired as long as needed, whether or not the project or program continues to be supported by the subgrant or, when appropriate, under other federal awards; however, the subgrantee must not encumber the equipment without prior approval of NBO and NTIA ([2 CFR 200.313](#)(c) and (e)).
2. Property records must be maintained that include a description of the property, a serial number or other identification number, the source of funding for the property (including the federal award and subgrant identification numbers), who holds title, the acquisition date, cost of the property, percentage of federal participation in the project costs for the federal award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sales price of the property ([2 CFR 200.313](#)(d)(1)).
3. A physical inventory of the property must be taken and the results reconciled with the property records at least once every two years ([2 CFR 200.313](#)(d)(2)).
4. A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated ([2 CFR 200.313](#)(d)(3)).
5. Adequate maintenance procedures must be developed to keep the property in good condition ([2 CFR 200.313](#)(d)(4)).
6. If the subgrantee is authorized or required to sell the property, proper sales procedures must be established to ensure the highest possible return ([2 CFR 200.313](#)(d)(5)).
7. When original or replacement equipment acquired under a federal award is no longer needed for a federal program (whether the original project or program or other activities currently or previously supported by the federal government), the subgrantee must request disposition instructions from NBO if required by the terms and conditions of the

subgrant. Items of equipment with a current per-unit fair market value of \$10,000 or less may be retained, sold, or otherwise disposed of with no further obligation to the federal awarding agency. If the federal awarding agency fails to provide requested disposition instructions within 120 days, items of equipment with a current per-unit fair market value in excess of \$10,000 may be retained or sold. The federal awarding agency is entitled to the federal interest in the equipment, which is the amount calculated by multiplying the current market value or sale proceeds by the federal agency's participation in total project costs ([2 CFR 200.313\(e\)](#)).

**Real Property.** Title to real property acquired or improved by non-federal entities under subgrants vests in the subgrantee subject to the obligations and conditions specified in [2 CFR 200.311](#). Real property will be used for the originally authorized purpose as long as needed for that purpose, during which time the subgrantee must not dispose of or encumber title to or other interests in the real property.

When real property is no longer needed for the originally authorized purpose, the subgrantee must obtain disposition instructions from NBO. When real property is sold, sales procedures must be followed that provide for competition to the extent practicable and result in the highest possible return. If sold, subgrantees must compensate the federal awarding agency for the portion of the net sales proceeds that represents the federal agency's interest in the real property, which is the amount calculated by multiplying the current market value or sale proceeds by the federal agency's participation in total project costs. If the property is retained, the subgrantee must compensate the federal awarding agency for the federal portion of the current fair market value of the property. Disposition instructions may also provide for transfer of title to the federal awarding agency or a designated third party, in which case the subgrantee is entitled to the subgrantee's interest in the property, which is calculated by multiplying the current market value or sale proceeds by the subgrantee's share in total project costs.

### **Indirect Costs**

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Indirect costs are allowable under NBEAD funding, and are expenses incurred for a common or joint purpose benefitting more than one cost objective and are not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. An applicant should describe the types of indirect costs it plans to charge to the subgrant. An applicant can never double-charge a cost as both a direct and an indirect cost. Indirect costs may be charged to the subgrant if:

- The applicant has a federally approved negotiated indirect cost rate from a cognizant agency; or
- The applicant elects to charge a *de minimis* rate of 15% of modified total direct costs (MTDC). MTDC means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$50,000 of each subgrant (regardless of the period of performance of the subgrants). MTDC excludes equipment, capital expenditures, rental costs, and the portion of each subgrant in excess of \$50,000. Subcontracts can be included as part of the MTDC calculation, and they are not subject to the limit of the first \$50,000 to which subgrants are held.
  - If an applicant elects to employ the 15% *de minimis* indirect cost rate, it cannot claim resulting costs as a match, nor can the applicant claim "unrecovered indirect costs" as a match. Neither of these costs can be reflected as actual indirect cost rates realized by the organization and, therefore, are not verifiable in the applicant records as required by federal regulation ([2 CFR 200.306\(b\)\(1\)](#)).

## APPLICATION REVIEW PROCESS & CRITERIA

PAs will be reviewed to ensure that all required documentation has been included. PAs that fulfill all mandatory requirements will be advanced for further evaluation. PAs will be judged non-responsive if they are incomplete, inadequately developed, or otherwise unsuitable for review and funding consideration. Non-responsive applications will not be reviewed further.

To support effective cost comparison across applications, NBO will prioritize applications that target all BSLs within a given DPA. Applications will be sorted by the proportion of BSLs targeted, with those covering 100% of a DPA's BSLs scored first. If no application is selected from that group, NBO will then consider applications covering less than 100% of the BSLs in the targeted DPA.

In alignment with the RPN, evaluation of the PAs will focus on the following.

All Projects	
Max Points	Criteria
	A. Minimal NBEAD Outlay: total NBEAD funding that will be required to complete the project, accounting for both total projected cost and the prospective subgrantee's proposed match
100	1. Total project cost minus proposed match
100	2. Total amount requested per BSL
If a competing application is submitted with a cost proposal within 15% of the lowest-cost proposal on a per-BSL basis, the following criteria will be used to further evaluate the applications.	
30	B. Speed to Deployment: Applicant's binding commitment to provision service by a specific date that is earlier than four years after the date on which the subgrantee will receive the subgrant. Greater consideration can be awarded to prospective subgrantees promising an earlier service provision date.
20	C. Speed of Network and Other Technical Capabilities: speed, latency, and other technical capabilities of the technologies proposed by prospective subgrantees.
250	Total Points Available

NBO reserves the right to reject any or all applications, wholly or in part. All awards will be made in a manner deemed by NBO to meet the goals of the NBEAD program.

Subgrants resulting from this RFA shall incorporate the following documents for non-LEO projects:

1. Amendment to the Subgrant with the most recent amendment having the highest priority;
2. Subgrant, excluding any attachments, with the following addenda in order of preference: Terms & Conditions 2026 Round;
3. Attachment 1;
4. All other attachments to the Subgrant.

For LEO projects, subgrants resulting from this RFA shall incorporate the following documents:

1. Amendment to the Subgrant with the most recent amendment having the highest priority;
2. Subgrant, excluding any attachments, with the following addenda in order of preference:  
Terms & Conditions – LEO Projects 2026 Round;
3. Attachment 1;
4. All other attachments to the Subgrant.

Unless otherwise specifically stated in a subgrant amendment, in case of any conflict between the incorporated documents, the documents shall govern in the order above, with number one (1) receiving preference over all other documents and with each lower numbered document having preference over any higher numbered document.

## PROJECT APPLICATION REQUIREMENTS

Complete each section of the PA in the NBEAD portal. All sections and questions are required. Please note that the wording of the questions in the portal may differ slightly, but the content is the same as described below.

PAs, including all attachments, must be submitted to NBO no later than 11:59 pm, Central Time on July 16, 2026 via the NBEAD portal, <https://apply.broadband.nebraska.gov/submit>. The portal will automatically acknowledge receipt of the PA. If you do not receive acknowledgement of your submission within 12 hours, notify NBO immediately at [nbo.grants@nebraska.gov](mailto:nbo.grants@nebraska.gov).

Please use the following naming convention for attachments: Organizational Abbreviation, Question #. If your file includes confidential or proprietary information, ensure you also include "Proprietary Information" in the file name, as described above.

### Table 1. Applicant Information

1.1. Authentication Code from [nbo.grants@nebraska.gov](mailto:nbo.grants@nebraska.gov).

1.2. Assign a name to your PA, using the naming convention "DPA# - Abbreviated Organization Name." If you plan to submit multiple PAs for a single DPA, please ensure you give them unique names by adding a number or tech abbreviation to the end of the filename.

1.3 Applicant name

1.4 Applicant Unique Entity Identifier (UEI)

1.5 Attach a PDF copy of the Applicant's SAM.gov profile, ensuring the active dates of the account are visible.

1.6 Legal description of DPA

1.7 Person to contact with questions about this PA

1.8 Contact person's email address

1.9 From NBO's website, <https://broadband.nebraska.gov>, download the version of the Terms & Conditions (T&Cs) that is appropriate for the technology you plan to deploy:

- Terms & Conditions for LEO projects
- Terms & Conditions for non-LEO projects

Sign the last page of the relevant document and upload it in response to this question. Name your file Organization Abbreviation-T&C. If you are submitting multiple PAs, you may submit the same T&C for all of them.

1.10 From NBO's website, <https://broadband.nebraska.gov>, download the Protecting from Defaults Certification (PFD) and following the instructions in that file, create, sign, and save to PDF format your PFD. Ensure the file includes the signature of the person authorized to sign any subgrants awarded under this RFA and upload it in response to this question. Name your file Organization Abbreviation-UEI-PFD Certificate. If you are submitting multiple PAs, you may submit the same PFD for all of them.

1.11 Authorized Official name

1.12 Email address of Authorized Official

1.13 Signature of Authorized Official

*By signing this Project Application, the Applicant guarantees compliance with the provisions stated in the NBEAD 2026 Round Request for Applications (RFA) and certifies that all*

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information contained in this Project Application is accurate and complete. The Applicant hereby approves the usage of electronic signatures pursuant to [Neb. Rev. Stat. §86-611](#) and [Nebraska Administrative Code, Title 437, Digital Signatures Act](#). This Project Application is submitted pursuant to the terms of the RFA, and if the Applicant is awarded funding, it will be incorporated into the subgrant between the parties. Applicant understands that if anything in this Project Application conflicts with the RFA or with the subsequent subgrant, the subgrant and RFA shall govern as set forth in the subgrant.

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## **Table 2: Certifications**

**For Applicants who do not already have one or more NBEAD subgrants, certify your agreement with the following:**

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- 2.1 Applicant certifies that they are financially qualified to meet the obligations associated with a project, that they will have available funds for all project costs that exceed the amount of the subgrant, and that they will comply with all program requirements, including milestones.
- 
- 2.2 Applicant certifies they have and will continue to have sufficient financial resources to cover its eligible costs for the project until such time as NBO authorizes reimbursements.
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- 2.3 Applicant certifies their understanding of the financial conditions and the performance standards including milestones.
- 
- 2.4 Applicant certifies that they will maintain their registration with the System for Award Management at SAM.gov for the duration of the subgrant project period.
- 
- 2.5 The applicant will use the awarded NBEAD funds in an equitable and nondiscriminatory manner.
- 
- 2.6 The applicant agrees to reasonable provisions for recovery of funds for nonperformance.
- 
- 2.7 Applicant certifies that they will comply with [Nebraska Executive Order 23-05](#), Enhancing Broadband Security.
- 
- 2.8 Applicant certifies they will not use NBEAD funding to purchase or support any covered communications equipment, services, or systems, as defined at [2 CFR 200.216](#).
- 
- 2.9 Applicant certifies that it is:
- Technically qualified to complete and operate the project, and
  - Capable of carrying out the funded activities in a competent manner, including that it will use an appropriately skilled and credentialed workforce.
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- 2.10 Applicant must certify one of the following:
- a. Applicant certifies that they have provided a voice, broadband service, and/or electric transmission or distribution service for at least the two (2) consecutive years prior to the date of this application submission or it is a wholly owned subsidiary of such an entity and possesses the operational capability to qualify to complete and operate a NBEAD project. If this is the case, initial here: \_\_\_\_\_ and enter the number of years the Applicant or its parent company has been operating here: \_\_\_\_\_
  - b. Applicant certifies they have not provided a voice or broadband service for at least the two (2) consecutive years prior to the date of its application submission or is it a wholly owned subsidiary of such an entity and possesses the operational capability to qualify to complete and operate a NBEAD project. Initial here: \_\_\_\_\_.
- 
- 2.11 Applicant must certify one of the following:
- a. Applicant certifies they have provided a voice and/or broadband service and that it has timely filed [Commission Form 477s](#) and the [Broadband DATA Act](#) submission, if applicable, as required during this time period, and otherwise has complied with the Commission's rules and regulations.
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- i. If the Applicant is unable to certify timely filing of Commission Form 477s and Broadband DATA Act submissions plus compliance with the Commission's rules and regulations, initial here: \_\_\_\_ and attach an explanation of any pending or completed enforcement action, civil litigation, or other matters in which it failed to comply or was alleged to have failed to comply with Commission rules or regulations.
  - b. Applicant certifies they have operated only electric transmission/ distribution services and has attached qualified operating or financial reports\* filed with relevant financial institutions for the relevant time period along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution. If this is the case, initial here: \_\_\_\_.
  - c. Applicant certifies that they are a new entrant to the broadband market and has attached evidence sufficient to demonstrate that the newly formed entity has obtained, through internal or external resources, sufficient operational capabilities. Such evidence should include résumés from key personnel, detailed project descriptions and narratives from contractors, subcontractors, or other partners with relevant operational experience, or other comparable evidence underlining operational proficiency. If this is the case, initial here: \_\_\_\_.

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\*Qualified operating or financial reports may be the Rural Utilities Service (RUS) Form 7, Financial and Operating Report Electric Distribution; the RUS Form 12, Financial and Operating Report Electric Power Supply; the National Rural Utilities Cooperative Finance Corporation (CFC) Form 7, Financial and Statistical Report; the CFC Form 12, Operating Report; or the CoBank Form 7; or the functional replacement of one of these reports. See *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 719, n. 202.

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### **Table 3. DPA, BSLs, & CAIs Targeted**

- 3.1 Download and complete the 2026 Round BSL-CAI Table Excel file for the targeted DPA or Standalone CAIs to include:
- a. the technology planned to be used for each BSL and/or CAI targeted;
  - b. anticipated download speed;
  - c. anticipated upload speed;
  - d. whether the planned service will meet the definition of low latency;
  - e. NBEAD funds requested for each BSL and/or CAI to be served by the project;
  - f. match offered for each BSL and/or CAI to be served by the project; and
  - g. planned date of deployment.

Your Planned Date of Deployment in the DPA, BSLs, & CAIs table should match the Program Closeout/Submission date in the Milestones schedule.

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*Please note: If the targeted DPA includes any BSLs for which you have planned deployment with private funding, assign to them a cost of \$1.00.*

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- 3.2 Will your project focus on or pass through tribal lands? If yes, describe and provide documentation of your efforts to secure a Resolution of Consent or other formal consent document from the relevant tribal government(s), including the present status of the discussions.
- 

### **Table 4. Financials**

- 4.1 Irrevocable letter of credit (ILOC): For non-LEO projects, using Attachment 2, below, as a reference, indicate which of the options (A, B, C, D, E, or F) is preferred by the Applicant to address the ILOC requirements; and upload the required documentation as defined in Attachment 2.
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4.1a Per the RPN, LEO projects must choose option A in Attachment 2. Select “yes” to indicate your understanding of this requirement and upload the required documentation as defined in Attachment 2.

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4.2 Complete and upload the Application Budget Form for your planned project, available at <https://broadband.nebraska.gov>. There are two versions of the form – please ensure you complete and upload the correct form.

- Application Budget Form for non-LEO projects
- Application Budget Form for LEO projects

Complete the required tabs, following the information in the Instructions tab:

- Application Budget
- Budget Proportions
- De minimis calc (if applicable)

Please note: The total NBEAD funding requested for your project via the Application Budget Form must match the total NBEAD funds requested in the 2026 Round DPA, BSLs, & CAIs Table for your project.

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4.3 Business plans: Attach business plans and related analyses that substantiate the sustainability of the project described by the application. This can be provided via *pro forma* statements or analyses, inclusive of cash flow and balance sheet projections and should include at least three (3) years of operating cost and cash flow projections post targeted completion of project.

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#### **Table 5: Project Details**

5.1 Complete and submit the NBEAD Milestones table for your project, available at <https://broadband.nebraska.gov>, using the version specific to the technology you plan to deploy:

- Fiber
- Fixed wireless, licensed or unlicensed
- Low-Earth orbit (LEO) satellite

NTIA requires that NBO define milestones and the subgrantees assign dates to each of them, to which they will be held throughout the project. The milestones themselves are not subject to negotiation.

Your Program Closeout/Submission date in the Milestones table should match your Planned Date of Deployment in the DPA, BSLs, & CAIs table.

Reminder: Applicants may propose to deploy a single technology or a combination of two or more technologies for each targeted BSL and CAI in your application. The specific technology to be deployed will become part of your subgrant document. Technologies cannot be changed following subgrant execution.

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5.2 Provide a brief description of the technology you plan to use for this project, including how you will ensure a minimum of 100 Mbps download/20 Mbps upload with latency of no more than 100 milliseconds (ms) for unserved and underserved BSLs; and/or 1 Gbps download/1 Gbps upload with latency of no more than 100 ms for CAIs and that can easily scale speeds over time to support evolving connectivity needs and the deployment of 5G and successor wireless technologies.

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- 5.3 If your project will address BSLs: provide a description of your low-cost service option (LCSO), including your eligibility criteria, that offers speeds of at least 100/20 Mbps and latency of no more than 100 ms for the targeted BSLs.
- 
- 5.4 Provide preliminary versions of the following, to demonstrate the technical capability of the Applicant:
- a. Network Design: documentation depicting the network architecture, the arrangement of the nodes and connections in the network and the physical means by which data is transmitted within the network.

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  - b. Network Diagram: documentation depicting the overall structure of the network showing the equipment types, the placement of the equipment, and the physical media connecting each device and the maximum speeds supported by each connection.

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  - c. Statement by a Professional Engineer, certifying that the proposed network can deliver broadband service that meets the performance requirements to all locations served by the project.
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- 5.5 Will your project include underground installation? If yes, your network must include excess conduit capacity and regular conduit access points for interconnection by others. Describe your plan to meet these requirements, including a rationale for each aspect of your plan.
- 
- 5.6 For Fiber projects only: will the project include deployment of new fiber or only lighting up of dark fiber?
- 
- 5.7 For Fixed Wireless projects only: will the project include a new tower build?
- 
- 5.8 For LEO projects only: will the project include installation of upgrades to any ground stations?
- 
- 5.9 If your project will involve Unlicensed Fixed Wireless (ULFW) technology, initial here to certify that you have addressed interference problems from other Part 15 users competing for the same spectrum.
- 
- 5.10 If your project will involve ULFW technology, initial here to certify that you have addressed evaluation difficulty problems regarding network capabilities.
- 
- 5.11 Attach résumés for up to 10 key management personnel that include information about their length of service in their current roles, current organization, and the field. Provide a summary of their anticipated roles in the NBEAD project(s).
- 
- 5.12 How many employment opportunities will be created by this project?
- 
- 5.13 Describe how you have and will continue to monitor for and comply with local, state, and federal laws.
- 
- 5.14 If your project will address or pass through Tribal lands, include a description of how your organization has and will continue to comply with Tribal laws and coordinate with the Tribal government(s).
- 
- 5.15 Provide clear documentation attesting to your understanding and commitment to comply with all relevant laws and safety requirements. Include evidence of past compliance or adherence to similar regulations in previous projects or endeavors. For example, you may attach previous records or compliance checks from past projects.
- 
- 5.16 Provide details of the established processes, procedures, or protocols you have in place to ensure continued compliance with federal safety and health requirements during your NBEAD-funded project; and training programs or initiatives aimed at informing and ensuring that your team understands and adheres to safety and legal standards.
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- 5.17 Provide a strategic plan showcasing your intent to employ a credentialled and skilled workforce for the NBEAD-funded project. Ensure you include assurances that you
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acknowledge NBEAD's program requirements and have the means to meet the technical obligations.

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## IRREVOCABLE LETTER OF CREDIT/PERFORMANCE BOND REQUIREMENTS

- I. **Options:** Applicants for non-LEO projects are required to select one of the following. LEO projects must select Option A, as required by the *BEAD Restructuring Policy Notice*.
- A. Irrevocable Letter of Credit (ILOC) from a bank in an amount of not less than 25% of the subgrant amount;
1. If you choose option A, submit with your PA a letter from a bank that meets the requirements detailed at *II. Bank Eligibility*, below. The letter must meet the following:
    - a. Commits to issue an irrevocable standby letter of credit;
    - b. Is in the required form (the required template is available for download at <https://broadband.nebraska.gov>);
    - c. To the subgrantee upon award of the NBEAD subgrant;
    - d. Provides the dollar amount of the ILOC, which must be at least 25% of the subgrant amount; and
    - e. Includes the bank's agreement to follow NBO's Terms & Conditions.
  2. Before NBO issues a subgrant for the project, you will be required to submit:
    - a. The ILOC for at least 25% of the subgrant amount; and
    - b. An opinion letter from legal counsel indicating the ILOC will not be treated as bankruptcy estate property.
  3. The ILOC may be revised or renewed with a reduced value upon completion and NBO approval of project milestones as detailed at *III. Reduction of Letters of Credit or Performance Bonds*, below.
- B. ILOC from a credit union in an amount of not less than 25% of the subgrant amount;
1. If you choose option B, submit with your PA a letter from a credit union that meets the requirements detailed at *Credit Union Eligibility* in section II., below. The letter must meet the following:
    - a. Commits to issue an ILOC;
    - b. Is in the required form (the required template is available for download at <https://broadband.nebraska.gov>);
    - c. To the subgrantee upon award of the NBEAD subgrant;
    - d. Provides the dollar amount of the ILOC, which must be at least 25% of the subgrant amount; and
    - e. Includes the bank's agreement to follow NBO's Terms & Conditions.
  2. Before NBO issues a subgrant for the project, you will be required to submit:
    - a. The ILOC for at least 25% of the subgrant amount; and
    - b. An opinion letter from legal counsel indicating the ILOC will not be treated as bankruptcy estate property.
  3. The ILOC may be revised or renewed with a reduced value upon completion and NBO approval of project milestones as detailed at *III. Reduction of Letters of Credit or Performance Bonds*, below.
- C. Performance bond from a company holding a certificate of authority as an acceptable surety on federal bonds for 100% of the subgrant amount;
1. If you choose option C, submit with your PA a letter from a company holding a certificate of authority as an acceptable surety on federal bonds that meets the requirements detailed at *Performance Bond Issuer Eligibility* in section III., below. The letter must meet the following:

- a. Be a letter from a company holding a certificate of authority as an acceptable surety on federal bonds as identified in the US Department of Treasury [Circular 570](#);
  - b. Commits to issue a performance bond;
  - c. Is in the required form (the required template is available for download at <https://broadband.nebraska.gov>);
  - d. To the subgrantee upon award of the NBEAD subgrant;
  - e. Provides the dollar amount of the performance bond, which must be 100% of the subgrant amount; and
  - f. Names NBO the primary beneficiary.
2. Before NBO issues a subgrant for the project, you will be required to submit a performance bond for no less than 100% of the subgrant amount.
  3. The Performance Bond may be revised or renewed with a reduced value upon completion and NBO approval of project milestones as detailed at *III. Reduction of Letters of Credit or Performance Bonds*, below.
- D. Alternative Letter of Credit Percentage: Letter of Credit from a Bank
1. Per the [BEAD Letter of Credit Waiver Notice](#), because NBEAD payments will be made on a reimbursement basis and each will cover a period of not more than six (6) months, NBO may accept an ILOC for from a bank that meets the requirements detailed at *II. Bank Eligibility*, below, for 10% of the subgrant amount, with the following caveats:
    - a. If you choose option D, submit with your PA a letter on Applicant organization letterhead committing to maintain the ILOC in the amount of 10% of the subgrant amount until NBO indicates, in writing, agreement that the buildout is complete to 100% of locations to be served by the project or until the period of performance of the subgrant ends, whichever occurs first.
    - b. Before NBO issues a subgrant for the project, you will be required to submit an ILOC from a bank that meets the requirements detailed at *Bank Eligibility* in section II, below; the letter must meet the following:
      - i. Commits to issue an ILOC;
      - ii. In the required form (the required template is available for download at <https://broadband.nebraska.gov>);
      - iii. To the subgrantee upon award of the NBEAD subgrant;
      - iv. Provides the dollar amount of the ILOC, which be at least 10% of the subgrant amount; and
      - v. Includes the bank's agreement to follow NBO's Terms & Conditions.
    - c. ILOCs secured under this option are not subject to revision or renewal at lower values.
- E. Alternative Letter of Credit Percentage: Letter of Credit from a Credit Union
1. Per the [BEAD Letter of Credit Waiver Notice](#), because NBEAD payments will be made on a reimbursement basis and each will cover a period of not more than six (6) months, NBO may accept an ILOC from a credit union that meets the requirements detailed at *Credit Union Eligibility* in section II., below, for 10% of the subgrant amount, with the following caveats:
    - a. If you choose option E, submit with your PA a letter on Applicant organization letterhead committing to maintain the ILOC in the amount of 10% of the subgrant amount until NBO indicates, in writing,

agreement that the buildout is complete to 100% of locations to be served by the project or until the period of performance of the subgrant ends, whichever occurs first.

- b. Before NBO issues a subgrant for the project, you will be required to submit a letter from a credit union that meets the requirements detailed at *Credit Union Eligibility* in section III., below. The letter must meet the following:
  - i. Commits to issue an ILOC;
  - ii. In the required form (the required template is available for download at <https://broadband.nebraska.gov>);
  - iii. To the subgrantee upon award of the NBEAD subgrant;
  - iv. Provides the dollar amount of the ILOC, which be at least 10% of the subgrant amount; and
  - v. Includes the bank's agreement to follow NBO's Terms & Conditions.
- c. ILOCs secured under this option are not subject to revision or renewal at lower values.

#### F. Alternative Performance Bond Percentage

1. Per the [BEAD Letter of Credit Waiver Notice](#), because NBEAD payments will be made on a reimbursement basis and each will cover a period of not more than six (6) months, NBO may accept a Performance Bond from a company holding a certificate of authority as an acceptable surety on federal bonds that meets the requirements detailed at *Performance Bond Issuer Eligibility* in section III., for 10% of the subgrant amount, with the following caveats:
  - a. If you choose option F, submit with your PA a letter on Applicant organization letterhead committing to maintain the Performance Bond in the amount of 10% of the subgrant amount until NBO indicates, in writing, agreement that the buildout is complete to 100% of locations to be served by the project or until the period of performance of the subgrant ends, whichever occurs first.
  - b. Before NBO issues a subgrant for the project, you will be required to submit a letter from a company holding a certificate of authority as an acceptable surety on federal bonds that meets the requirements detailed at *Performance Bond Issuer Eligibility* in section III., below. The letter must meet the following:
    - i. Commits to issue a performance bond;
    - ii. Is in the required form (the required template is available for download at <https://broadband.nebraska.gov>);
    - iii. To the subgrantee upon award of the NBEAD subgrant;
    - iv. Provides a dollar amount of the performance bond, which must be at least 10% of the subgrant amount; and
    - v. Names NBO the primary beneficiary.
  - c. Performance Bonds secured under this option are not subject to revision or renewal at lower values.

## II. **Bank Eligibility** ([47 CFR 54.804 \(c\)\(2\)](#))

- A. Any US bank that:
  1. Is insured by the [Federal Deposit Insurance Corporation](#) (FDIC)

2. Is “well capitalized” as determined by federal bank regulations promulgated by the Federal Deposit Insurance Corporation, the Federal Reserve, and the Office of the Comptroller of the Currency; or
  3. Is rated BBB- or higher by a Nationally Recognized Statistical Rating Organization (NRSRO), as recognized by the Securities and Exchange Commission (SEC); or
- B. [CoBank](#), as long as it meets requirements at the time of issuance; or
- C. [National Rural Utilities Cooperative Finance Corporation](#), if it meets requirements at the time of issuance; or
- D. Any non-US bank;
1. That is among the 100 largest non-US banks in the world;
  2. Has a branch office;
    - a. In the District of Columbia; or
    - b. New York City, New York;
  3. Has a long-term unsecured credit rating equivalent to BBB- or better by [Standard & Poor](#); and
  4. Issues the ILOC payable in US dollars.

**Credit Union Eligibility** ([47 CFR 54.804 \(c\)\(2\)](#))

- A. Any US credit union that is insured by [National Credit Union Administration](#)

**Performance Bond Issuer Eligibility** ([47 CFR 54.804 \(c\)\(2\)](#))

- A. Performance bonds issued by company holding a certificate of authority as an acceptable surety on federal bonds as identified in the [Department of Treasury Circular 570](#).

**III. Reduction of Letters of Credit or Performance Bonds**

- A. Per the [BEAD Letter of Credit Waiver Notice](#), if option A, B, or C is selected above, and upon completion of each milestone and written approval by NBO, the Subgrantee may obtain and submit to NBO a revised ILOC or Performance Bond or renew its existing ILOC or Performance Bond with a reduced value in accordance with the following schedule:

Milestones for non-LEO-based projects	If you choose option A or B, ILOC may be reduced to:	If you choose option C, Performance Bond may be reduced to:
Provider certification and NBO completion of a technical and compliance audit that the provider has reached the following milestones:		
1. Detailed engineering plan: NBO approval of detailed project budget, engineering plan, and schedule as an addendum to the executed subgrant agreements.	23.75%	95%
2. Permitting/make ready: Proof that necessary permits have been requested filed with the NBO. Fully executed contracts by all required parties must be submitted to NBO to consider this milestone achieved.	22.5%	90%
3. Material & equipment procurement: Proof of binding agreement to acquire BABA-compliant equipment prior to start of construction.	12.5%	50%

4. Fiber projects	LFW/ULFW projects		
<ul style="list-style-type: none"> <li>a. Locates completed</li> <li>b. Middle mile secured</li> <li>c. Installation to cabinet</li> <li>d. Pedestals installed</li> </ul>	<ul style="list-style-type: none"> <li>a. Site acquisition</li> <li>b. Backhaul to middle mile connection</li> <li>c. Tower access points with mounts, other equipment deployed, cabinet connection</li> <li>d. Tower activation and connection to network; drive tests</li> </ul>	2.5%	10%
5. Program closeout submission: Confirmation of all completed construction and activation based on testing data, as-builts, and NBO field verification.		0%	0%

<b>Milestones for LEO projects</b>	<b>ILOC may be reduced to:</b>
1. Upon subgrantee certification to NBO that broadband service is available to every location covered by the project	50%
2. Subscription rate reaches at least 25% of BSLs in the DPA	25%
3. Subscription rate reaches 50% or four (4) years from date Subgrantee certifies that it can initiate broadband service within 10 business days of a request to any covered BSL in the project area	0%

## REPORTING REQUIREMENTS

The following is a summary of NBEAD reporting requirements. NBO is working to ensure reporting is not heavier than absolutely necessary, as simple as possible to complete, and meets federal requirements.

**One-Time: items on which subgrantees should only need to report once**

- a. Resolution of consent from Tribal governments, if applicable
- b. Broadband Facility Agreements

**Quarterly: items necessary for quarterly reports and reimbursement requests.** Please note that a number of these items will serve merely as reminders. For example, if you did not update your cybersecurity plan in the reporting period, you will indicate so and move to the next topic. In addition, some items may not apply to all projects, so may be skipped.

- a. Budget reporting and reimbursement request, including tracking against the approved budget and match
- b. Submission of source documents as requested
- c. SF425, federal financial reports
- d. Subcontractor information, including number and dollar amounts of subcontracts
- e. Build America Buy America compliance
- f. Cybersecurity plan updates
- g. Supply chain risk management updates
- h. Right of way permitting and pole attachments
- i. Acknowledgement of funding
- j. Whistleblower protections
- k. Progress update/performance reporting
- l. Inspection and testing of materials
- m. Service data by BSL
- n. Filings with the Federal Communications Commission
- o. Conduit access points
- p. Mandatory disclosures
- q. Tribal consultations
- r. Communication and outreach activities
- s. Purchases of real and tangible property
- t. Disposition of real and tangible property
- u. Irrevocable Letter of Credit/Performance Bond updates

**Annual: items on which reporting is necessary only annually. There are overlaps in topics with quarterly report requirements, but the questions are different.**

- a. Updates to UEI, Nebraska Secretary of State registration
- b. Negotiated Indirect Cost Rate Agreement (NICRA) or *de minimis* updates
- c. Copies of audits
- d. Middle mile interconnections
- e. Updates to certifications regarding drug-free workplace, avoidance of conflicts of interest, etc.
- f. Inventory of real and tangible property
- g. Copies of procurement and other policies

- h. Executive compensation reporting, if applicable
- i. Risk assessment – annual update
- j. Duplication of benefits sign-off

**Post-deployment: *items on which reporting will commence once deployment is complete.***

Requirements for post-deployment reporting are still evolving, but will likely include:

- a. Completion report
- b. Service obligations
- c. Service details