

December 16, 2025

Agenda ID: 23844  
RESOLUTION T-17898

TO: PARTIES TO [R2302016](#)

Service List(s): [R2302016](#)

This is Draft Resolution T-17898 of the Communications Division, which requests approval from the Commission to submit the Broadband Equity, Access, and Deployment (BEAD) Final Proposal to the National Telecommunications and Information Administration (NTIA), grants Communications Division Staff the authority to propose cures to address deficiencies NTIA identifies in the Final Proposal, and to submit any revisions made to address the NTIA's cure requests via resolution to the Commission for ratification. This Draft Resolution will appear on the agenda at the next Commission meeting to be held December 18, 2025, which is 16 days after the date of this letter. The Commission may vote on this Resolution at that time, or it may postpone a vote until a later meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting. When the Commission votes on a Draft Resolution, it may adopt all or part of it as written, amend, modify, or set it aside and prepare a different Resolution. Only when the Commission acts does the Resolution become binding on the parties.

The comment deadline will be 7 days after the resolution is served, shortened to meet the expedited timeframe set by the NTIA, as established in Decision 25-07-040. Any member of the public may serve comments on the Draft Resolution as provided in Public Utilities Code § 311(g) and Rule 14.5 of the Commission's Rules of Practice and Procedure (Rules).

Comments along with a certificate of service (COS) shall be sent via email to: [BEADgrant@cpuc.ca.gov](mailto:BEADgrant@cpuc.ca.gov) and [Ngan.Tran@cpuc.ca.gov](mailto:Ngan.Tran@cpuc.ca.gov) by December 9, 2025 at 5:00 PM.

Those submitting comments on the Draft Resolution must serve their comments on the entire service list the Draft Resolution was served to on the same date that the comments are submitted to the Communications Division.

Comments shall focus on factual, legal, or technical errors in the proposed Draft Resolution. Comments that merely reargue positions taken in the advice letter or

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protests will be accorded no weight and are not to be submitted. Comments should list the recommended changes to the Draft Resolution.

Comments shall be limited to fifteen pages in length.

Replies to comments will not be accepted for this Resolution.

Sincerely,

/s/

Maria Ellis

Director,

Communications Division

California Public Utilities Commission

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Agenda ID # 23844 (Rev. 1)  
COMMUNICATIONS DIVISION

RESOLUTION T-17898  
December 18, 2025  
Item 37

**DRAFT R E S O L U T I O N**

Resolution requesting approval from the Commission to submit the Broadband Equity, Access, and Deployment (BEAD) Final Proposal to the National Telecommunications and Information Administration (NTIA). The Final Proposal builds on the previously approved Initial Proposal, modified in accordance with the BEAD Restructuring Policy Notice (RPN), and includes a list of preliminary awards to applicants selected for BEAD grant funding through the BEAD Subgrantee Selection Process. Staff may propose cures to timely address deficiencies NTIA identifies in the Final Proposal, and any revisions made to address NTIA's cure requests will be submitted via resolution to the Commission for ratification.

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**I. SUMMARY**

This Resolution recommends approving Communications Division Staff (Staff)'s request to submit the Broadband Equity, Access, and Deployment (BEAD) Final Proposal to NTIA. The Final Proposal builds on the previously approved Initial Proposal, revised in accordance with the [BEAD Restructuring Policy Notice](#) (RPN), and includes a list of preliminary awards to applicants selected for BEAD grant funding through the BEAD Subgrantee Selection Process.

This Resolution also authorizes Staff to propose cures to timely address any deficiencies that NTIA identifies in the Final Proposal. Staff will submit any revisions made to address NTIA's cure requests via resolution to the Commission for ratification.

The Final Proposal must be submitted to NTIA by December 19, 2025. Submission of a compliant Final Proposal to NTIA is necessary for California to secure and administer \$1.86 billion in last-mile funding allocated to the state under the BEAD program.

This Resolution reviews Staff's actions to implement actions consistent with the authority granted in the California Public Utilities Commission (Commission) [Decision 25-07-040](#). That authority covered five activities, each of which must be reflected in the BEAD Final Proposal for Commission consideration and adoption following public comment. The Resolution will discuss each of these activities in detail in the Background and Discussion sections.

1. Revising BEAD eligibility for broadband serviceable locations
2. Scoring BEAD applications, consistent with the BEAD Policy Restructuring Notice issued by NTIA on June 6, 2025, as well as the guidance in Section 4 of Decision 25-07-040
3. Developing guidance for BEAD applicants
4. Providing notice of the BEAD grant application windows; and
5. Preparing the Commission's BEAD Final Proposal, which the Commission will consider via resolution prior for submission to NTIA.

The BEAD Final Proposal is submitted to the Commission as Appendix A.

## **II. BACKGROUND**

Prior to the issuance of the BEAD Restructuring Policy Notice (RPN), and in accordance with [Decision 24-05-029](#) and [Decision 24-09-050](#), Staff had achieved several significant implementation milestones in advancing the BEAD program and California's subgrantee selection process. Staff conducted extensive outreach and engagement efforts with potential applicants through public webinars, informational sessions, and dedicated office hours to help potential applicants understand program requirements and explain the application process. Consistent with requirements in the BEAD NOFO and California's BEAD Initial Proposal, Staff designed, developed, and launched the grant application portal, prepared and published comprehensive application materials, and provided additional application assistance through Frequently Asked Questions (FAQ) documents.

The initial BEAD Prequalification Application window was held on March 25 – May 1, 2025, and the initial Project Application window was held on April 2 – May 9, 2025. Staff had developed application evaluation processes and had begun the evaluation

process for the submitted BEAD applications when the RPN was issued. These efforts established the foundational framework for the subgrantee selection process prior to the issuance of the RPN.

On July 24, 2025, the Commission approved [Decision 25-07-040](#), which modified Decision 24-05-029 and Decision 24-09-050, to implement the changes NTIA mandated in the [BEAD RPN](#). Commission Decision 25-07-040 requires Staff to submit the Final Proposal for Commission approval.

NTIA issued its RPN on June 6, 2025, changing the policy requirements to which States must adhere in conducting their BEAD subgrantee selection processes. NTIA added new requirements, including but not exclusive to, the need to revise the file containing eligible Broadband Serviceable Locations (BSLs) to account for unlicensed fixed wireless service, revise the scoring rubric to evaluate applications, open an additional application round incorporating the RPN policy changes to provide the opportunity for all eligible technologies to qualify for Priority status, and submit a Final Proposal by September 4, 2025. On July 18, 2025, Staff filed a waiver request with NTIA to submit Final Proposals within 90 days of issuance of the RPN. NTIA approved this request on August 8, 2025, extending the deadline to October 2, 2025. On August 29, 2025, Staff filed a second waiver request, which NTIA approved on September 10, 2025, further extending the Final Proposal submission deadline to November 21, 2025.

Based on feedback received during the Special Award Condition (SAC) meeting on November 5, 2025, NTIA instructed Staff to reduce the cost of the highest-cost per BSL proposals before publishing the draft Final Proposal for public comment. In response, Staff conducted an additional negotiation round, resulting in a reduction in the number of these highest-cost proposals. NTIA also indicated that it would work with Staff to set a new submission date that accommodated the CPUC's statutorily required decision making process. On November 13, 2025, Staff submitted to NTIA a waiver extension request to allow Staff to submit the draft Final Proposal to NTIA on December 19, 2025. On December 4, 2025, Staff received formal approval from NTIA to extend the Final Proposal submission deadline to December 19, 2025. On November 18, 2025, NTIA granted Staff permission to publish the Final Proposal for public comment. The Commission approved [Decision 25-07-040](#) authorized Staff to complete a set of five core activities that form the foundation of the state's BEAD implementation. These activities are designed to ensure compliance with NTIA requirements, promote a transparent and competitive grant process, and provide applicants and stakeholders with clear, consistent guidance. Collectively, they establish the procedural and substantive framework needed for the Commission to prepare and adopt California's BEAD Final Proposal before submission to NTIA.

The five activities referenced above are: revising BEAD eligibility for broadband serviceable locations, scoring BEAD applications, developing applicant guidance, providing notice of BEAD grant application windows, and preparing the Commission's BEAD Final Proposal for submission to NTIA.

## **1. Revising BEAD eligibility for broadband serviceable locations**

Prior to the BEAD 1.0<sup>1</sup> Subgrantee Selection Process, Staff conducted a Challenge process, during which qualified entities were able to challenge the existing BEAD Challenge Process map by submitting evidence through the BEAD Challenge Portal when challengers believed specific locations were not accurately represented as unserved, underserved, or served. Version 4 of the Broadband Serviceable Locations Fabric, released by NTIA on May 14, 2024, served as the basis for the BEAD Challenge Process. The BEAD Challenge Process map published by Staff for the BEAD Challenge Phase reflected a subsequent deduplication process and incorporated California's Pre-Challenge modifications.

The BEAD Challenge Phase opened on July 8, 2024, at 8:00 a.m. PST and ended on August 6, 2024, at 11:59 p.m. PST. Staff evaluated the evidence provided by the challenging entities and updated its BEAD-eligible location list based on its review. California's BEAD Challenge results were submitted in December 2024 to NTIA and approved in January 2025.

Upon NTIA approval of the BEAD challenge process, Staff published final map of locations eligible for BEAD funding. Staff published additional materials for the public on its [BEAD Challenge Process](#) website.

The BEAD Restructuring Policy Notice required Staff to adjust California's BEAD-eligible locations for BEAD 2.0. Staff accounted for locations that did not require BEAD funding using the reason code process detailed in NTIA's Final Proposal Guidance, consistent with requirements in the RPN.

Staff investigated locations served by unlicensed fixed wireless (Reason Code 5), locations with pending enforceable commitments (Reason Code 4), locations that were removed from Version 6 of the FCC fabric (Reason Code 3), and Community Anchor

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<sup>1</sup> The designation of "BEAD 1.0" refers to BEAD programmatic design prior to the RPN. "BEAD 2.0" in this Resolution refers to the BEAD programmatic design after the changes made by the RPN.

Institution (CAI) designations to update its BEAD-eligible locations list in compliance with the RPN.

Staff notified unlicensed fixed wireless providers on June 18, 2025, to indicate their intent to submit evidence that BEAD-eligible locations they serve have access to BEAD-qualified service. Providers were given a seven-day window, consistent with requirements in the RPN, to notify Staff of their intent to submit their evidence. Staff developed a technical template in alignment with the RPN and shared it with providers to submit their evidence. Providers that indicated their intent to submit evidence within the seven-day window were given the evidence template, instructions, and a deadline of seven calendar days to submit their evidence. Staff reviewed the evidence submitted by unlicensed fixed wireless providers prior to the filing deadline to determine whether service for the identified locations met or did not meet the technical requirements established in the RPN. If service for the identified locations met the technical requirements, these locations were no longer considered eligible for BEAD funding. If service for the identified locations did not meet the technical requirements, these locations remained eligible for BEAD funding.

On June 13, 2025, Staff received a list of changes to federal enforceable commitments from its NTIA Federal Program Officer. Staff evaluated this list and modified its BEAD-eligible locations list accordingly.

Staff compared locations in Version 6 of the FCC Fabric with California's post-challenge BEAD eligible locations list. Locations that were removed from Version 6 of the FCC fabric were removed from the BEAD eligible locations list for BEAD 2.0, consistent with requirements in NTIA's Final Proposal Guidance. Staff removed locations from its approved CAI list that no longer qualified as CAIs under the definition adopted by the RPN.

On July 19, 2025, the state published the final list of the approved post-Challenge Process location classifications reconciled for BEAD 2.0 on the [CPUC website](#). The locations included in this final list constitute all locations that applicants could apply to serve in the BEAD 2.0 process.

## **2. Scoring BEAD applications**

The application period for the BEAD 2.0 Benefit of the Bargain (BOTB) Round 1 opened on July 19, 2025 and closed on August 2, 2025. After applications were received, Staff evaluated applications and made preliminary assignment determinations.

Staff conducted a rigorous application review. Applications were scored in alignment with the scoring rubric provided in the RPN. The review process included the following steps:

- *Sufficiency review*: Staff evaluated applications for completeness and sufficiency. Individual components of the application were then reviewed by Staff subject matter experts.
- *Financial review*: Staff reviewed responses to questions related to the applicant's financial capability and project-specific financial documentation.
- *Technical review*: Staff reviewed responses to questions related to technical design for technical feasibility and for Priority/Non-Priority determinations. Staff's technical review followed a uniform, technology-neutral approach consistent with the RPN.

After confirming that each application was complete and that the data were sufficient for scoring, Staff made Priority/Non-Priority determinations for each application. Staff then scored each application.

Staff evaluated responses to scored questions according to the updated BEAD 2.0 scoring criteria, generating a cost per location as part of the minimal BEAD outlay primary criterion and a numerical score for the secondary scoring criteria for each application that had a competing proposal in the same general project area with a cost per location within 15 percent of the lowest-cost proposal. Staff conducted a quality control check of the score outputs by comparing the outputs to applicants' responses in the application, and validated score outputs against the technical review results. Staff made preliminary assignments to the projects that scored highest for each project area, in line with the scoring rubric and other requirements in the statute and in the NTIA BEAD Notice of Funding Opportunity (NOFO), as modified by the RPN.

A subsequent BEAD 2.0 BOTB Round 2 was conducted by Staff to expand the number of locations served by Priority Broadband Projects. This round allowed applicants to apply to serve PAUs that could not be assigned a Priority project in BOTB Round 1 under the requirements of the BEAD NOFO and RPN. Staff accepted new Prequalification Applications from September 16, 2025 to October 2, 2025 and new Project Applications from September 25, 2025 to October 3, 2025.

The application scoring and review process for BOTB Round 2 was identical to that of BOTB Round 1. Staff made preliminary assignments to highest-scoring projects in each Project Area, consistent with the scoring rubric and the requirements of the statute and the BEAD NOFO, as modified by the RPN. Following the completion of BOTB Rounds 1 and 2, Staff made the final preliminary award determinations for inclusion in the Final Proposal submission.



The full list of preliminary awards is outlined in Appendix A - Final Proposal.

### 3. Developing guidance for BEAD applicants

#### 3.1 BEAD 1.0 Subgrantee Selection Process - Technical Assistance and Training

Staff developed a variety of technical assistance and training materials in order to assist BEAD applicants in navigating the Subgrantee Selection Process. Utilizing BEAD outreach channels such as webinars, Office Hours, Constant Contacts, and the production of BEAD guidance knowledge products such as Frequently Asked Questions (FAQ), Prequalification Application Guides and Templates, and Project Application Guides and Templates, Staff provided BEAD applicants ample instructions for BEAD 1.0 and BEAD 2.0.

##### 3.1.1 BEAD 1.0 Webinars

To support BEAD applicants, Staff developed outreach tools to educate and provide technical assistance. Staff produced a series of fourteen Technical Assistance webinars about the BEAD 1.0 Subgrantee Selection Process, starting on December 3, 2024, and ending on April 9, 2025. The Technical Webinar series described in detail each step of the program, including the application process, financial and technical requirements, evaluation and scoring of applications, and other key elements for participation.

Date	Title	Presentation Link
April 9, 2025	<a href="#">Grant Management System: Platform Basics</a>	N/A
April 9, 2025	<a href="#">Grant Management System: Prequalification and Revisions</a>	N/A
April 9, 2025	<a href="#">Grant Management System: System Navigation, Mapping, Project Area Selection</a>	N/A
April 7, 2025	<a href="#">Supplemental Application Forms</a>	<a href="#">Presentation</a>
April 2, 2025	<a href="#">Project Application Guide</a>	<a href="#">Presentation</a>
March 27, 2025	<a href="#">Prequalification Application Guide</a>	<a href="#">Presentation</a>
March 27, 2025	<a href="#">Updated BEAD Program Design</a>	<a href="#">Presentation</a>
January 28, 2025	<a href="#">Other BEAD requirements</a>	<a href="#">Presentation</a>
January 21, 2025	<a href="#">BEAD Matching Funds</a>	<a href="#">Presentation</a>

Date	Title	Presentation Link
January 14, 2025	<a href="#"><u>BEAD Technical requirements</u></a>	<a href="#"><u>Presentation</u></a>
January 9, 2025	<a href="#"><u>BEAD Applicant Financial Requirements</u></a>	<a href="#"><u>Presentation</u></a>
December 17, 2024	<a href="#"><u>BEAD Program Evaluation</u></a>	<a href="#"><u>Presentation</u></a>
December 10, 2024	<a href="#"><u>BEAD Program Design - Project Areas, Negotiations, &amp; Selection</u></a>	<a href="#"><u>Presentation</u></a>
December 3, 2024	<a href="#"><u>BEAD and Prequalification Overview Webinar</u></a>	<a href="#"><u>Presentation</u></a>

### 3.1.2 BEAD 1.0 Office Hours

Staff produced and hosted a series of fourteen Office Hours for the BEAD 1.0 Subgrantee Selection Process, starting on January 16, 2025, and ending on May 8, 2025. The purpose of the Office Hours series was to provide BEAD applicants with an opportunity to present questions directly to Staff. Staff would address those questions directly in the Office Hour session, in a response within the BEAD Frequently Asked Questions (FAQ) document, or through the BEAD Grant inbox.

Date	Title	Recording Links
May 8, 2025	BEAD Subgrantee Selection Process Office Hours	<a href="https://youtu.be/eJOBSJDQ1qg"><u>https://youtu.be/eJOBSJDQ1qg</u></a>
May 1, 2025	BEAD Subgrantee Selection Process Office Hours	<a href="https://youtu.be/ywvu1ZGbhKM"><u>https://youtu.be/ywvu1ZGbhKM</u></a>
April 24, 2025	BEAD Subgrantee Selection Process Office Hours	<a href="https://youtu.be/ISWpPJg8E3s"><u>https://youtu.be/ISWpPJg8E3s</u></a>
April 17, 2025	BEAD Subgrantee Selection Process Office Hours	<a href="https://youtu.be/c_5arU47dxg"><u>https://youtu.be/c_5arU47dxg</u></a>
April 10, 2025	BEAD Subgrantee Selection Process Office Hours	<a href="https://youtu.be/qre7IPTx1sQ"><u>https://youtu.be/qre7IPTx1sQ</u></a>
April 3, 2025	BEAD Subgrantee Selection Process Office Hours	<a href="https://youtu.be/6GsljzVcvq4"><u>https://youtu.be/6GsljzVcvq4</u></a>

Date	Title	Recording Links
March 27, 2025	BEAD Subgrantee Selection Process Office Hours	<a href="https://youtu.be/bGRz2Z3ksRg">https://youtu.be/bGRz2Z3ksRg</a>
March 20, 2025	BEAD Subgrantee Selection Process Office Hours	<a href="https://youtu.be/UC_phCQnVLs">https://youtu.be/UC_phCQnVLs</a>
February 27, 2025	BEAD Subgrantee Selection Process Office Hours	<a href="https://youtu.be/D3qObqHhkGo">https://youtu.be/D3qObqHhkGo</a>
February 20, 2025	BEAD Subgrantee Selection Process Office Hours	<a href="https://youtu.be/ucYWok8XKq4">https://youtu.be/ucYWok8XKq4</a>
February 13, 2025	BEAD Subgrantee Selection Process Office Hours	<a href="https://youtu.be/_wXR7qBIpzk">https://youtu.be/_wXR7qBIpzk</a>
January 30, 2025	BEAD Subgrantee Selection Process Office Hours	<a href="https://youtu.be/L6ow3N5wWdM">https://youtu.be/L6ow3N5wWdM</a>
January 23, 2025	BEAD Subgrantee Selection Process Office Hours	<a href="https://youtu.be/J_SR7vMUQTk">https://youtu.be/J_SR7vMUQTk</a>
January 16, 2025	BEAD Subgrantee Selection Process Office Hours	<a href="https://youtu.be/YRQbMBMZawc">https://youtu.be/YRQbMBMZawc</a>

### 3.1.3 BEAD 1.0 Constant Contact

To efficiently distribute BEAD news, updates, and information to stakeholders, Staff used the Constant Contact online email lists. BEAD applicants could join the list by visiting the CPUC BEAD website, providing their email address, first and last name, and optionally their organization name, then selecting the “Broadband Equity, Access, and Deployment (BEAD) Program” option. By clicking “Sign up!”, applicants were added to the Constant Contact database, which Staff used to distribute BEAD communications.

#### [BEAD 1.0 Constant Contact link](#)

The Constant Contact would allow Staff to distribute information to stakeholders concerning BEAD topics including, but not exclusive to:

- BEAD 1.0 Timeline
- Prequalification application grant window
- Project Application grant window
- Webinar dates and times
- Office Hour dates and times

- BEAD Challenge Process updates
- Post-Challenge Process BEAD map updates
- BEAD 1.0 Frequently Asked Questions (FAQ) releases

### 3.1.4 BEAD 1.0 Subgrantee Selection Process Frequently Asked Questions (FAQ)

To promote transparency and provide equal access to information, Staff developed the BEAD 1.0 Subgrantee Selection Process Frequently Asked Questions (FAQ) documents to address inquiries from applicants and stakeholders. Over the course of October 8, 2024, to May 19, 2025, Staff received 481 questions from BEAD outreach channels and provided official responses to ensure all interested parties have access to the same information. These questions and responses were incorporated into the BEAD 1.0 Subgrantee Selection Process FAQ. A total of thirteen iterations of the BEAD 1.0 Subgrantee Selection Process FAQ was published on the CPUC BEAD website and stakeholders were notified of updates through the BEAD Constant Contact email list.

[BEAD Subgrantee Selection Process FAQ, Version 12.0, May 16, 2025](#)

### 3.1.5 BEAD 1.0 Prequalification Application Guides and Templates

The BEAD 1.0 Prequalification Application was opened from March 25 – May 1, 2025. In advance of the opening of the Prequalification Application window, Staff developed Prequalification Application materials and requisite templates to help applicants successfully complete the Prequalification Application. On March 12, 2025, Staff published the Prequalification Application Guide v1, Prequalification Application Templates, and the BEAD Application Process Checklist v2 on the CPUC BEAD website.

The Prequalification Application Guide v1 provided applicants with instructions for the Prequalification Application process. The Prequalification Application Templates required documents which applicants must complete and upload to the BEAD application portal to successfully submit the Prequalification Application were shared with applicants ahead of the opening of the Prequalification Application window to assist in application preparation. The BEAD Application Process Checklist v2 assisted applicants in tracking key preparation steps for their Prequalification Applications.

### BEAD 1.0 Prequalification Application Guide and Checklist

- [Prequalification Application Guide v2](#)

- [BEAD Application Process Checklist v2](#)

#### BEAD 1.0 Prequalification Application Templates

- [3.3 Past Performance and Experience Template v2](#)
- [3.3A Other Public Funding Template v2](#)
- [3.3B Service Pricing in Non-Grant Funded Areas Template v2](#)
- [4.6 Ownership Information Template v2](#)
- [CPUC Prequalification Notarized Affidavit for Telephone Corporation v1](#)
- [CPUC Prequalification Notarized Affidavit for Non-Telephone Corporation v1](#)
- [CPUC Prequalification Confidentiality Template v1](#)

#### 3.1.6 BEAD 1.0 Project Application Guides and Templates

The BEAD 1.0 Project Application opened on April 2, 2025, and closed on May 9, 2025. In advance of the opening of the Project Application window, Staff developed key knowledge products and requisite templates for completion of the Project Application. On March 20, 2025, Staff published the Project Application Guide and Project Application Templates on the CPUC BEAD website. Project Application Guides provided detailed instructions to help applicants complete the Project Application, including background information, portal navigation guidance, and question-by-question instructions. The Project Application Templates are required documents for applicants to complete to properly submit their Project Applications.

#### BEAD 1.0 Project Application Guides

- [BEAD Project Application v2](#)

#### BEAD 1.0 Project Application Templates

- [01.3B Partners v1](#)
- [03.3Bii 90 Percent Proposal Locations List v2](#)
- [03.3Bvii and 03.4Ai Match-Eligible Federal Sources v1](#)
- [03.3Bxvii and 03.4Gi In-Kind Matching Funds v1](#)
- [03.3D Locations List v2](#)
- [05.4 Technical Specifications v1](#)
- [05.5 Fixed Wireless Design Submission v1](#)
- [05.6 Alternative Technology Design Submission v1](#)
- [05.7 Project Timeline v1](#)
- [05.8 Project Costs v1](#)
- [05.9 Professional Engineer Certification v1](#)
- [07.2A Letter of Commitment v1](#)

- [07.2C Surety Bond v1](#)
- [07.3 Pro Forma v1](#)
- [07.3A Budget Narrative v1](#)
- [08.2 Certification and Licenses v1](#)
- [05.3D Logical Network Diagram Sample v1](#)

## 3.2 BEAD 2.0 Subgrantee Selection Process – Technical Assistance and Training

### 3.2.1 BEAD 2.0 Webinars

Staff produced a series of two Technical Assistance webinars for the BEAD 2.0 BOTB Round 1, starting on July 11, 2025, and ending on July 18, 2025. Staff produced one Technical Assistance webinar for the BEAD 2.0 BOTB Round 2 on September 26, 2025. The webinar series described in detail how the RPN modified and/or replaced BEAD 1.0 program components such as, but not exclusive to:

- Elimination of Regulatory Burdens
- Technology Neutrality
- Priority Broadband Projects
- Technologies Eligible for Participation
- The Benefit of the Bargain Round (Subgrantee Selection)
- Scoring Rubrics
- Optimizing BEAD Locations
- Non-Deployment Funding & Permitting
- Alignment with Prior Guidance
- Modification of Initial and Final Proposals

Date	Title	Presentation Link
September 26, 2025	<a href="#">BEAD BOTB Round 2 - Program Changes</a>	<a href="#">Presentation</a>
July 18, 2025	<a href="#">BEAD Program Restructuring - Changes to California's BEAD program and Project Application in compliance with NTIA's BEAD Restructuring Policy Notice</a>	<a href="#">Presentation</a>
July 11, 2025	<a href="#">BEAD Program Changes- Complying with NTIA's BEAD Restructuring Policy Notice</a>	<a href="#">Presentation</a>

### 3.2.2 BEAD 2.0 Office Hours

Staff produced and hosted a series of four Office Hours for the BEAD 2.0 BOTB Round 1, starting on July 22, 2025, and ending on July 31, 2025. Staff also produced one BEAD BOTB Round 2 Office Hours on September 30, 2025. The purpose of the Office Hours series was to provide BEAD applicants an opportunity to present BEAD 2.0 related questions directly to Staff. Staff would address applicant questions directly in the Office Hours, in a BEAD FAQ response, or through the BEAD Grant inbox.

Date	Title	Recording Link
September 30, 2025	BEAD 2.0 Benefit of the Bargain Office Hours	<a href="https://youtu.be/VDPouPVUxfU">https://youtu.be/VDPouPVUxfU</a>
July 31, 2025	BEAD 2.0 Benefit of the Bargain Office Hours	<a href="https://youtu.be/jH-wcNfZ0as">https://youtu.be/jH-wcNfZ0as</a>
July 29, 2025	BEAD 2.0 Benefit of the Bargain Office Hours	<a href="https://youtu.be/VLE4uqrhEn8">https://youtu.be/VLE4uqrhEn8</a>
July 24, 2025	BEAD 2.0 Benefit of the Bargain Office Hours	<a href="https://youtu.be/ovw8Iw2PPMM">https://youtu.be/ovw8Iw2PPMM</a>
July 22, 2025	BEAD 2.0 Benefit of the Bargain Office Hours	<a href="https://youtu.be/jRpuHTv4tqs">https://youtu.be/jRpuHTv4tqs</a>

### 3.2.3 CPUC BEAD 2.0 Constant Contact

In order to distribute BEAD news, updates, and information to stakeholders in an efficient and comprehensive manner, Staff utilized the Constant Contact email lists. For BEAD applicants to be included in the Constant Contact online email lists, they would access the CPUC BEAD website, submit their contact email, first name, last name, organization name (optional), and select the “Broadband Equity, Access, and Deployment (BEAD) Program” option. The BEAD applicant will then click on the “Sign up!” button to complete the Constant Contact email list inclusion process. These submissions are collected into a database and used to distribute BEAD communications.

#### [BEAD 2.0 Constant Contact link](#)

The Constant Contact would allow Staff to distribute information to stakeholders concerning BEAD 2.0 topics including, but not exclusive to:

- BEAD 2.0 Timeline

- Prequalification application grant window
- Benefit of the Bargain Round 1 and Round 2 grant window
- Webinar dates and times
- Office Hour dates and times
- BEAD 2.0 Frequently Asked Questions (FAQ) releases

### 3.2.4 BEAD 2.0 Subgrantee Selection Process Frequently Asked Questions (FAQ)

In response to the RPN, Staff updated or removed questions from the BEAD 1.0 Subgrantee Selection Process FAQ to reflect program changes resulting from the RPN. This revised FAQ became the BEAD 2.0 Subgrantee Selection Process FAQ, which also included new questions from applicants about modifications to the BEAD program.

Over the course of BEAD 2.0, from June 6, 2025 to October 2, 2025, Staff received 140 BEAD 2.0 related questions through BEAD outreach channels and provided official responses to ensure all interested parties have access to the same information. These questions and responses were then incorporated into the BEAD 2.0 Subgrantee Selection Process FAQ. A total of nine iterations of the BEAD 2.0 Subgrantee Selection Process FAQ was published on the CPUC BEAD website and stakeholders were notified through the BEAD Constant Contact email list.

[CPUC BEAD 2.0 Subgrantee Selection Process Frequently Asked Questions \(FAQ\)](#)

### 3.2.5 BEAD 2.0 Prequalification Application Guides and Templates

The BEAD 2.0 BOTB Round 1 Prequalification Application was re-opened from July 11, 2025, to July 17, 2025, as required by the NTIA BEAD RPN. The BEAD 2.0 BOTB Round 2 Prequalification Application was re-opened from September 16, 2025, and closed on October 2, 2025. In advance of the re-opening of both Prequalification Application windows, Staff developed new BEAD 2.0 Prequalification Application materials or revised existing BEAD 1.0 Prequalification Application materials to reflect the modifications required by the RPN.

BEAD 2.0 Prequalification Application Guide

- [BEAD 2.0 - CPUC Prequalification Guide](#)
- [BEAD 2.0 - CPUC Prequalification Guide \(redline\)](#)

BEAD 2.0 Prequalification Application Templates



- [BEAD 2.0 - 3.3 Past Performance and Experience Template](#)
- [BEAD 2.0 - 3.3A Other Public Funding Template](#)
- [BEAD 2.0 - 4.6 Ownership Information Template](#)
- [BEAD 2.0 - CPUC Prequalification Confidentiality Template](#)
- [BEAD 2.0 - CPUC Prequalification Notarized Affidavit for Non-Telephone Corporation](#)
- [BEAD 2.0 - CPUC Prequalification Notarized Affidavit for Telephone Corporation](#)

### 3.2.6 BEAD 2.0 Benefit of the Bargain Round 1 Guides and Templates

The BEAD BOTB Round 1 opened on July 19, 2025, and closed on August 2, 2025. Per the RPN, Staff were required to perform an additional application solicitation round that incorporated the modifications instituted by the RPN. In anticipation of the opening of the BOTB Round 1 window, Staff developed new BEAD 2.0 BOTB application materials or revised existing BEAD 1.0 Project Application materials to reflect the modifications required by the RPN.

#### BEAD 2.0 Benefit of the Bargain Round 1 Guides

- [BEAD 2.0 - CPUC Project Application Guide](#)
- [BEAD 2.0 - CPUC Project Application Guide \(redline\)](#)
- [BEAD 2.0 - Scoring Rubric](#)
- [BEAD 2.0 Benefit of the Bargain Application Template Checklist](#)

#### BEAD 2.0 Benefit of the Bargain Round 1 Templates

- [01.3B BEAD 2.0 Partners Template](#)
- [3 BEAD 2.0 Project Application Templates \(Section 3 ZIP\)](#)
- [5 BEAD 2.0 Project Templates \(Section 5 ZIP\)](#)
- [11.18 BEAD 2.0 Pro forma](#)
- [11.19 BEAD 2.0 Budget Narrative Template](#)
- [11.24 BEAD 2.0 Letter of Commitment Template](#)
- [11.24C BEAD 2.0 Surety Bond Template](#)
- [11.28 BEAD 2.0 Certification and Licenses Template](#)
- [11.2A BEAD 2.0 Low-Earth Orbit \(LEO\) Evidence Submission Template and Instructions \(ZIP\)](#)
- [11.3A BEAD 2.0 Unlicensed Fixed Wireless \(ULFW\) Evidence Submission Template and Instructions \(ZIP\)](#)
- [11.4A BEAD 2.0 Licensed Fixed Wireless \(LFW\) Evidence Submission Template and Instructions \(ZIP\)](#)

- [11.5A BEAD 2.0 Hybrid Fiber-Coaxial \(HFC\) Evidence Submission Template and Instructions \(ZIP\)](#)
- [11.6A BEAD 2.0 Fiber-to-the-Premises Evidence Submission Template and Instructions \(ZIP\)](#)
- [11.7 BEAD 2.0 Locations List Template BSLs](#)
- [11.7 BEAD 2.0 Locations List Template CAIs](#)
- [11.9 BEAD 2.0 CPUC BEAD Network Diagram Officer Attestation Template](#)
- [11.9 BEAD 2.0 Instructions for Submitting No BEAD Location Evidence](#)
- [12 BEAD 2.0 Affidavits and Template \(Section 12 ZIP\)](#)

### 3.2.7 BEAD 2.0 Benefit of the Bargain Round 2 Guides and Templates

The BEAD BOTB Round 2 opened on September 25, 2025, and closed on October 3, 2025. The purpose of BOTB Round 2 was to solicit applications for eligible Project Area Units (PAUs) that did not receive Priority Project Applications in BOTB Round 1 that could be awarded as stated in the NOFO and the RPN. In anticipation of the opening of the BOTB Round 2 window, Staff revised the BEAD 2.0 BOTB Round 1 Project Application Guide, eligible locations and PAU lists, and other application materials to reflect the modifications required by BEAD BOTB Round 2.

#### BEAD 2.0 Benefit of the Bargain Round 2 Guides

- [BEAD 2.0 - CPUC Project Application Guide](#)

## 4. Providing notice of the BEAD grant application windows

### 4.1 BEAD 1.0

Notice of the BEAD 1.0 grant application window availability was provided by Staff through multiple BEAD outreach channels. The provisional BEAD Subgrantee Selection Process Timeline was published on January 31, 2025, on the CPUC BEAD website. A Constant Contact notification was then sent to stakeholders the same day, announcing the posting of the BEAD Timeline. Communications with stakeholders through public outreach and technical assistance tools such as the BEAD Webinars, Office Hours, and FAQ reiterated the importance of regularly checking the CPUC BEAD website for updates and registering for the BEAD Constant Contact email list.

The provisional BEAD Timeline published on January 31, 2025, is linked below:

[BEAD Subgrantee Selection Process Timeline \(January 31, 2025\)](#)

### BEAD 1.0 Constant Contact link

- A. On February 7, 2025, a subsequent Constant Contact notification was sent to stakeholders, reiterating the public posting of the BEAD Timeline on the CPUC website.
- B. On March 3, 2025, a Constant Contact was released announcing the posting of an updated BEAD Timeline to the CPUC website.
- C. On March 25, 2025, a Constant Contact was released announcing the opening of the BEAD Application Portal Registration and the BEAD 1.0 Prequalification Application window.
- D. On April 2, 2025, a Constant Contact was released announcing the opening of the BEAD 1.0 Project Application window.
- E. On April 22, 2025, a Constant Contact was released announcing a one-week extension to both the Prequalification Application window and the Project Application window
- F. On May 1, 2025, a Constant Contact was released reminding BEAD applicants that the Prequalification Application window will be closed on May 1, 2025, 11:59 p.m. PST.
- G. On May 1, 2025, a Constant Contact was released reminding BEAD applicants that the Project Application window will be closed on May 9, 2025, at 11:59 p.m. PST.

## **4.2 BEAD 2.0**

Notice of the BEAD 2.0 grant application window availability was provided by Staff through multiple BEAD channels. The provisional BEAD 2.0 Subgrantee Selection Process Timeline was published on July 10, 2025, on the CPUC BEAD website. A Constant Contact notification was then sent to stakeholders the same day, announcing the posting of the BEAD 2.0 Timeline. The BEAD Timeline included provisional dates of the re-opening of the BEAD Application Portal Registration, the re-opening of the Prequalification Application grant window, and the dates of the Benefit of the Bargain Round 1 and Round 2 grant windows.

Communications with stakeholders through public outreach and technical assistance tools such as the BEAD Webinars, Office Hours, and FAQ reiterated the importance of regularly checking the CPUC BEAD website and registering for the BEAD Constant Contact email list.

#### [BEAD 2.0 Constant Contact link](#)

- A. On July 10, 2025, a Constant Contact notification was sent to stakeholders announcing the update of the BEAD 2.0 Timeline on the CPUC website. The update included information on the re-opening of the BEAD Application Portal Registration and the dates and time of Prequalification Application grant window.
- B. On July 18, 2025, a Constant Contact notification was sent to stakeholders announcing the update of the BEAD 2.0 Timeline on the CPUC website. The update included information on the dates and time of the Benefit of the Bargain grant window.
- C. On July 18, 2025, a Constant Contact notification was sent to stakeholders announcing the update of the BEAD 2.0 Timeline on the CPUC website. The update included an announcement of the opening of the Benefit of the Bargain grant window.
- D. On July 31, 2025, a Constant Contact notification was sent as a reminder to BEAD applicants of the closing of the Benefit of the Bargain grant window on August 2, 2025, 6:00 p.m. Pacific.
- E. On August 2, 2025, a Constant Contact notification was sent as a second reminder to BEAD applicants of the closing of the Benefit of the Bargain grant window on August 2, 2025, 6:00 p.m. Pacific.
- F. On August 4, 2025, a Constant Contact notification was sent as a reminder to BEAD applicants that the Benefit of the Bargain grant window officially closed on August 2, 2025, 6:00 p.m. Pacific.
- G. On August 22, 2025, a Constant Contact notification was sent to stakeholders announcing the update of the BEAD 2.0 Timeline on the CPUC website. NTIA notified the Commission on August 8, 2025, that it had approved the CPUC's waiver request. The new due date for the submission of the Final Proposal to NTIA was revised to October 2, 2025.

- H. On September 16, 2025, a Constant Contact notification was sent to stakeholders announcing the update of the BEAD 2.0 Timeline on the CPUC website upon NTIA's approval of the CPUC's additional waiver request. The update included information on the re-opening of the BEAD Application Portal for registration and the dates and time of BEAD BOTB Round 2 Prequalification Application grant window.
- I. On September 23, 2025, a Constant Contact notification was sent to stakeholders announcing the update of the BEAD 2.0 Timeline on the CPUC website. The update announced the dates of the BEAD BOTB Round 2 Project Application window and the extension of the BEAD BOTB Round 2 Prequalification Application window.

### **III. DISCUSSION**

The Commission finds that Staff reasonably implemented the ministerial activities delegated by Decision 25-07-040 in a manner consistent with NTIA's RPN. Staff's activities in redesigning the subgrantee selection process, conducting application reviews, and preparing the Final Proposal were reasonable, transparent, and compliant with federal and state requirements. The Final Proposal reflects these reasonable activities and is in the public interest. Timely submission of a compliant Final Proposal to NTIA is necessary for California to secure and administer \$1.86 billion in last-mile funding that California has been allocated under the BEAD program.

California's Final Proposal proposes awarding \$1,575,998,427, consisting of \$1,410,602,060 to build terrestrial broadband infrastructure to 200,545 locations, and \$165,396,367 to serve 138,019 additional locations via satellite<sup>2</sup>. Together, these projects are expected to reach 100% of eligible BEAD locations statewide, representing 176,542 unserved and 162,022 underserved eligible locations. The total proposed deployment cost under the BEAD Program is \$1,575,998,427, with participating subgrantees collectively providing an additional \$921,266,224 in matching funds. The average cost per BSL for California is \$4,655. A total of 340 projects are recommended for award under this Resolution. In addition to deployment funding, \$37,182,800 is allocated for administrative costs.

As part of the five core activities delegated to Staff by Decision 25-07-040, Staff developed the draft BEAD Final Proposal to be submitted to NTIA following

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<sup>2</sup> Figures are rounded; therefore, totals may not precisely equal the sum of the components.

Commission approval by resolution. The Final Proposal builds upon the previously approved Initial Proposal, modified to fully align with the RPN, and includes a list of preliminary award recommendations to applicants selected through the Subgrantee Selection Process.

To ensure compliance with federal guidance, and in direct response to the RPN, Staff redesigned the subgrantee selection process to reflect the principles of transparency, competition, and technology neutrality. Staff removed non-statutory requirements, such as provisions related to labor, climate change, affordability, and stakeholder engagement from applications, agreements, and reporting obligations. Eliminating these provisions reduced potential barriers to BEAD participation and ensured that providers across all technology platforms—fiber, cable, satellite, and both licensed and unlicensed fixed wireless—could compete on equal footing, provided they demonstrated the ability to meet federal performance standards.

Staff also integrated new requirements introduced under the RPN, including:

- Ensuring unlicensed fixed wireless providers had the opportunity to demonstrate qualifying coverage;
- Updating the list of eligible locations to reflect enforceable commitments, FCC’s Broadband Serviceable Location Fabric revisions, and revising definitions of CAIs;
- Incorporating NTIA’s updated rules into Staff’s technical and financial review standards to maintain consistency across all applicants.

In keeping with NTIA’s emphasis on broad competition, Staff reopened its prequalification window to allow both new entrants and previously ineligible entities to participate in the Benefit of the Bargain Round. Application materials were streamlined to reflect the revised requirements, and Staff introduced the BOTB Round 1 (July 19–August 2, 2025), with the goal of identifying the most cost-effective project proposals. Previously prequalified applicants were not required to resubmit full applications, and responses to eliminated questions were disregarded to preserve fairness. All applicants were required to submit new or revised proposals under an updated scoring rubric and standardized technical templates, ensuring consistent and objective evaluation.

Applications were subject to multiple layers of review, including sufficiency checks, financial capability assessments, and detailed technical evaluations. Consistent with the RPN, scoring methodology emphasized cost-effectiveness and prioritized Priority Broadband Projects—defined as networks capable of delivering at least 100/20 Mbps speeds, latency of 100 milliseconds or less, and scalability to higher speeds to meet evolving connectivity needs of households and businesses and support the deployment

of 5G, successor wireless technologies, and other advanced services—unless significantly more costly than alternatives. Where competing bids fell within a 15 percent cost margin for the same general project area, Staff applied secondary criteria (Speed to Deployment, Speed of Network) to guide final determinations.

To safeguard impartiality and uphold the integrity of the subgrantee selection process, Staff engaged independent, conflict-free reviewers. These technical experts, financial specialists, and analytics reviewers were knowledgeable of BEAD requirements and followed standardized procedures and quality-control protocols. Their findings were consolidated and presented to Staff for final award determinations.

Staff published all guides, templates, FAQs, application materials, and scoring rubrics on its public BEAD website, while also hosting weekly webinars, open office hours, and ongoing stakeholder engagement communication to ensure broad understanding and accessibility. These outreach efforts ensured transparency in alignment with the BEAD program requirements.

Staff's evaluation methodology emphasized rigor, fairness, and accessibility. Engineering experts required applicants to submit detailed documentation on network capacity, latency, spectrum use, design architecture, and scalability. Proposals were evaluated across a range of technologies—including fiber, hybrid fiber-coaxial (HFC), licensed and unlicensed fixed wireless, and low-earth-orbit (LEO) satellite systems—and were reviewed to ensure compliance with statutory and policy criteria. This data-driven, technology-neutral approach ensured that only projects capable of delivering reliable, high-quality, and cost-effective broadband service advanced as Priority Broadband Projects.

With NTIA's approval to extend the Final Proposal submission deadline to November 21, 2025, the additional time further maximized the BOTB by increasing competition and driving down costs for taxpayers through a second BOTB round of competitive bidding for Priority Broadband Projects and negotiations. Staff opened BOTB Round 2 on September 25, 2025, to solicit applications for eligible PAUs that did not receive a Priority Project Application in BOTB Round 1 that could be awarded under the NOFO and the RPN. In preparation for the Round 2 application window (September 25 – October 3, 2025), Staff updated the BEAD 2.0 BOTB Round 1 Project Application Guide, eligible location and PAU lists, and other associated application materials to incorporate the modifications required for BOTB Round 2.

On November 5, 2025, Staff met with NTIA for its SAC meeting to review the preliminary results of subgrantee selection, during which NTIA expressed concerns

about the costs associated with the highest-cost per BSL proposals. NTIA requested Staff to develop and implement strategies to reduce the costs of as many of these highest-cost proposals as possible. Subsequently, Staff conducted an additional negotiation round, resulting in a reduction in the number of these highest-cost proposals. On November 13, 2025, Staff submitted to NTIA a waiver extension request to allow submission of the draft Final Proposal by December 19, 2025, which NTIA formally approved on December 4, 2025. On November 18, 2025, upon completion of the final negotiation round, NTIA lifted the SAC and granted Staff permission to publish the Final Proposal for public comment.

By incorporating the RPN throughout its design, outreach, and evaluation processes, the Staff's ministerial activities were conducted in a reasonable and consistent manner. The Final Proposal reflects a deliberate and balanced strategy to maximize California's allocation of BEAD funds. The proposal recommends awards to projects best positioned to close the digital divide. The Commission finds that these actions were compliant with Decision 25-07-040.

Accordingly, the Commission finds that the BEAD Final Proposal reflects the reasonable activities and determinations undertaken by Staff, is aligned with federal requirements, and represents a fair and balanced strategy to maximize California's allocation of BEAD funds. The Final Proposal is reasonable and in the public interest to safeguard public investments, ensure accountability, and accelerate progress toward closing the digital divide, particularly for unserved and underserved communities.

Therefore, the Commission will adopt the Final Proposal for submission to NTIA.

Following submission of the Final Proposal to NTIA, consistent with the BEAD NOFO and federal statute (47 U.S.C. § 1702(e)(4)), the NTIA may approve the Final Proposal, in which instance California's BEAD funds will be made available for implementation. Alternatively, the NTIA may formally engage with Staff in various written curing requests following submission of the Final Proposal. Staff may propose cures to timely address deficiencies NTIA identifies in the Final Proposal. After the Final Proposal is approved by NTIA, Staff will submit any revisions made to address the NTIA's cure requests via resolution to the Commission for ratification.

## **COMMENTS**

Public Utilities Code Section 311(g)(3) provides: "Consistent with regulatory efficiency and the need for adequate prior notice and comment on commission decisions, the



commission may adopt rules, after notice and comment, establishing additional categories of decisions subject to waiver or reduction” of the ordinary 30-day comment period set forth by Section 311(g)(1). Relying on Section 311(g)(3), in Decision 25-07-040 the Commission reduced the public review and comment period for this Resolution and waived reply comments.<sup>3</sup>

Accordingly, this draft resolution was published for comment on December 2, 2025. Any comments are due within 7 days of the date of its mailing and publication on the [Commission’s website](#) and in accordance with any instructions accompanying the notice. Communications Division will not accept reply comments.

### **COMMENTS ON DRAFT RESOLUTION**

In compliance with Public Code Section 311(g)(3), Staff emailed a letter on December 2, 2025, notifying all parties on the service list of the availability of this Resolution for public comments at the Commission’s website.

Staff received 15 timely public comments on this Resolution from the following entities:

- AARP California
- AT&T California
- Calaveras Telephone Company; CalTel Connections, Volcano Telephone Company, and Volcano Vision, Inc.
- Center for Accessible Technology (“CforAT”)
- Comcast Phone of California, LLC (“Comcast”)
- Communications Workers of America (CWA) District 9
- Ducor Telephone Company, Varcomm Broadband, Inc., and The Siskiyou Telephone Company (“Calaveras/Amador Rural ILECs”)
- Frontier California Inc.
- Further Reach Inc. (“Further Reach”)
- IBT Group USA, LLC.
- Optimum Communications, Inc. (“Optimum”)
- Space Exploration Technologies Corp. (“SpaceX”)
- Tarana Wireless, Inc. (“Tarana Wireless”)
- Velocity Communications, Inc. (“Velocity”)
- Vernonburg Group LLC

Staff have reviewed and addressed all comments received. A high-level summary is provided below:

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<sup>3</sup> Decision 25-07-040, at pp. 26-27.

Adherence to BEAD Program Requirements and NTIA Guidance:

Velocity, Comcast, IBT, and Further Reach asserted that Staff must follow all BEAD Program requirements and NTIA guidance. Staff agrees and confirms that it has complied with NTIA guidance throughout this process. Staff acknowledges differences between BEAD NOFO and the RPN and notes that it adhered to the RPN in accordance with all applicable requirements. Further, Staff followed the subgrantee selection guidelines described in California's IPv2 and draft Final Proposal.

Priority Broadband Project Status:

Staff received comments from IBT challenging the determination of Priority and non-Priority status for certain applications. Staff followed the guidelines and requirements established in NTIA's BEAD RPN and evaluated all applications based on evidence submitted by the applicants.

Preliminary BEAD Awards:

Velocity, Calaveras/Amador Rural ILECs, Tarana Wireless, SpaceX, IBT, Further Reach, and Optimum expressed concerns regarding certain preliminary awards, including assertions that some projects or locations were incorrectly awarded based on cost per location, technology type, or other factors. Staff followed the guidelines and requirements set forth in the BEAD RPN and other BEAD Program guidance when making preliminary award determinations.

Location Accuracy:

Velocity, Calaveras/Amador Rural ILECs, Tarana Wireless, Further Reach, and Optimum raised concerns about the assignment and status of specific BSLs. Staff followed the BEAD NOFO, RPN, and related guidance when determining BSL status, and will continue working with NTIA to make any needed adjustments prior to issuing BEAD awards.

BEAD Non-Deployment Funds:

Staff received comments from Vernonburg Group recommending preferred uses of BEAD non-deployment funds. Staff notes that the availability and eligible uses of such funds are determined by NTIA. When non-deployment funds become available to the CPUC, Staff will follow NTIA guidance and all applicable rules in determining appropriate allocation and activities.

BEAD Grant Agreement and Monitoring Plan:

Staff received comments from Frontier, Tarana Wireless, AT&T, and Comcast regarding proposed revisions to the draft BEAD Grant Agreement and Monitoring Plan. Staff

acknowledges that these are currently still in draft form and will be working closely with NTIA to update and ensure alignment with federal requirements and program goals.

#### Workforce Development and Apprenticeships:

Communications Workers of America (CWA) District 9 raised issues related to workforce development and apprenticeship obligations for BEAD-funded deployments. Staff notes that workforce-related requirements are excluded from the RPN and therefore were not used in the evaluation of preliminary awards. Staff affirms that it will follow California's laws as applicable.

#### Additional Comments:

- AARP California commends the CPUC's inclusion of many "older adult-serving and frequented locations in its broadband strategy" such as libraries and other trusted community anchors and emphasizes that leveraging these networks will expand broadband access and create supportive environments for older adults, helping build a more connected and inclusive California.
- Center for Accessible Technology recommends that Staff clarify in the draft Resolution how NTIA requirements restricted Staff's ability consider additional public interest benefits that could have more effectively and equitably expanded broadband service in California. Staff acknowledges that the draft Resolution reflects the public interest considerations permissible under NTIA's requirements.

In response to comments from Comcast, Staff has provided a "Y" answer for question 0.5 of the draft Final Proposal and has updated the language in questions 1.1 and 12.1 of the draft Final Proposal to more precisely describe the review process. While Staff declines to revise the rest of the draft Final Proposal at this time, it will consider these 15 sets of public comments, as appropriate, during its engagement with NTIA in the formal curing process.

### FINDINGS AND CONCLUSIONS

1. Prior to the issuance of the BEAD Restructuring Policy Notice (RPN), Staff had achieved several significant implementation milestones in advancing the BEAD program. These milestones included conducting extensive outreach and engagement efforts with potential applicants through public webinars, informational sessions, and dedicated office hours to explain program requirements and the application process. Staff also designed, developed, and launched the grant application portal, prepared and published comprehensive application materials and supporting

documentation, and received and processed applications submitted during the initial application window. Collectively, these efforts established the foundational framework for program administration prior to the issuance of the RPN.

2. On June 6, 2025, NTIA issued the RPN, which changed the policy requirements to which States must adhere in implementing the BEAD program.
3. On July 24, 2025, the Commission approved [Decision 25-07-040](#), which authorized Staff to align the BEAD program with the RPN and to perform five core BEAD program activities that will be included in the Final BEAD Proposal, after first receiving public comment.
4. In compliance with the RPN, California's BEAD eligible locations were revised through a process consistent with the requirements set forth therein, and the updated list of eligible locations for BEAD 2.0 was published on July 18, 2025.
5. On July 18<sup>th</sup>, 2025, Staff posted the Benefit of the Bargain Round 1 grant window timeline on the CPUC website, including the revised Project Application Guide, application templates, and updated eligible locations lists. A Constant Contact notification was sent to BEAD stakeholders.
6. California's Benefit of the Bargain Round 1 opened on July 19, 2025. The total number of lead applicants was 25 and applicants submitted 7,555 applications for a total of \$3.46 billion of BEAD funds before the closing of the window on August 2, 2025.
7. On September 23, 2025, Staff posted the updated BOTB Round 2 Project Application Guide on the CPUC BEAD website, in advance of the BOTB Round 2 grant window opening. Staff opened the BOTB Round 2 on September 25, 2025, and closed the window on October 3, 2025.
8. The Benefit of the Bargain Round 2 resulted in a total of 24 lead applicants and a total of 201 applications submitted. The total BEAD funding request was \$1.108 billion.
9. In response to NTIA's request from the SAC meeting on November 5, 2025, Staff conducted an additional negotiation round, which resulted in a reduction in the number of highest-cost proposals. On November 18, 2025, NTIA granted Staff permission to publish the Final Proposal for public comment. On December 4, 2025,

Staff was given written approval from NTIA to extend the Final Proposal submission deadline to December 19, 2025.

10. Staff scored and analyzed the applications for compliance with NOFO and RPN requirements, reviewed local feedback, and conducted financial, managerial, and technical evaluations of all applicants.
11. All applications awarded in the Final Proposal met minimum eligibility requirements provided in [Decision 23-02-016](#) and [Decision 25-07-040](#).
12. The applications contained in this Resolution comply with NTIA's BEAD programmatic rules, [Decision 23-02-016](#), [Decision 24-05-029](#), [Decision 24-09-050](#), [Decision 25-07-040](#), and contribute to the BEAD program goal of expanding broadband internet service to all unserved and underserved locations in California.
13. California's Final Proposal proposes awarding \$1,575,998,427, consisting of \$1,410,602,060 to build terrestrial broadband infrastructure to 200,545 locations, and \$165,396,367 to serve 138,019 additional locations via satellite. Together, these projects are expected to reach 100% of eligible BEAD locations statewide, representing 176,542 unserved and 162,022 underserved eligible locations.
14. The Final Proposal reasonably reflects the Commission's delegation of authority to Staff in its prior orders, including Decision 23-02-016, Decision 24-05-029, Decision 24-09-050, and Decision 25-07-040; conforms to federal law and regulation; and is in the public interest.
15. The Final Proposal recommended by Staff is reasonable and should be adopted for submission to NTIA.
16. The NTIA may formally engage with Staff in various written curing requests following submission of the Final Proposal.
17. Staff may propose cures to timely address deficiencies NTIA identifies in the Final Proposal.
18. After the Final Proposal is approved by NTIA, Staff will submit any revisions made to address NTIA's cure requests via resolution to the Commission for ratification.

19. Draft Resolution T-17898 was emailed to the R.2302016 Service List on December 2, 2025, in compliance with Public Utilities Code Section 311(g)(1). The Commission timely received 15 sets of public comments.

**THEREFORE, IT IS ORDERED THAT:**

1. The Commission approves the BEAD Final Proposal and authorizes Staff to submit the BEAD Final Proposal to NTIA.
2. Staff may propose cures to timely address deficiencies NTIA identifies in the Final Proposal.
3. Staff will submit any revisions made to address the NTIA's cure requests via resolution to the Commission for ratification.

This Resolution is effective today.

Commissioner Signature blocks to be added  
upon adoption of the resolution

The foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on December 18, 2025; the following Commissioners voting favorably thereon:

Dated \_\_\_\_\_, at <Voting meeting location>, California

## **APPENDICES**

APPENDIX A – [Final Proposal \(Project Narrative\)](#)

APPENDIX B – Data Files

- APPENDIX B1 – [Subgrantees](#)
- APPENDIX B2 – [Deployment Projects](#)
- APPENDIX B3 – [Locations](#)
- APPENDIX B4 – [No BEAD Locations](#)
- APPENDIX B5 – [Community Anchor Institutions](#)

APPENDIX C – [Environmental Historic Preservation \(EHP\) Plan](#) (14.1)

APPENDIX D – [BEAD Program Monitoring Plan](#) (4.2)

APPENDIX E – [Draft Grant Agreement \(Agency Policy Documentation\)](#) (4.2)