

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Agenda ID #24420 (Rev. 1)
Communications Division

RESOLUTION T-17920
September 17, 2026
Item 42

DRAFT R E S O L U T I O N

Resolution requests California Public Utilities Commission (Commission) ratification of the revised Broadband Equity, Access, and Deployment (BEAD) Final Proposal and delegation to Staff the authority to take any ministerial action necessary to implement and effectuate California's BEAD program, consistent with the revised Final Proposal and legally applicable federal and California statutes, regulations, and guidance. Resolution requires Staff to submit any future deployment changes requiring NTIA approval, including other program elements and any supplemental deployment activities, to the Commission for ratification via resolution, following NTIA approval on an annual basis, or more frequently as necessary.

I. SUMMARY

This Resolution recommends ratification of Communications Division Staff's (Staff) revisions to the Broadband Equity, Access, and Deployment (BEAD) Final Proposal. Following submission of California's BEAD Final Proposal to the National Telecommunications and Information Administration (NTIA) on December 19, 2025, NTIA initiated its formal curing process, which identified specific items requiring revision or clarification. Pursuant to the authority granted by the California Public Utilities Commission (Commission) in [Resolution T-17898](#), Staff made limited revisions to address NTIA's curing requests and now submits the revised Final Proposal to the Commission for ratification.

NTIA approval of a compliant Final Proposal is required for California to secure and administer approximately \$1.86 billion in BEAD last-mile broadband funding. Consistent with [Resolution T-17898](#), the Commission previously approved California's

Final Proposal submission to NTIA and authorized Staff to propose and implement cures to address specific NTIA requests, subject to Commission ratification. On July 17, 2026, NTIA notified the Commission of its approval of California's Final Proposal. This Resolution reviews Staff's actions taken in response to NTIA's curing requests and determines whether those actions are reasonable and consistent with applicable BEAD program requirements.

The revised BEAD Final Proposal is submitted to the Commission as Appendix A. Appendices B (Data Files) and C (BEAD Program Monitoring Plan) are also included at the end of this Resolution, as they have been updated during the curing process. Consistent with Resolution T-17898, items revised in response to NTIA curing requests are included in this resolution.

II. BACKGROUND

On December 18, 2025, the Commission approved [Resolution T-17898](#), authorizing Staff to submit California's BEAD Final Proposal to NTIA¹. Staff submitted the BEAD Final proposal to NTIA on December 19, 2025, which initiated NTIA's formal Final Proposal review and curing process.

The BEAD Notice of Funding Opportunity (NOFO) states that NTIA may require eligible entities to revise or clarify elements of their Final Proposal to ensure compliance with federal statutory and programmatic requirements.² NTIA's curing process is iterative and limited in scope, focusing on discrete items or areas requiring additional explanation rather than reopening the state's overall program design or policy determinations. To satisfy the limited timeframes for Staff to complete curing requests, Staff worked quickly to provide diligent and comprehensive responses. For curing requests that required additional time to complete, Staff submitted extension requests, which were granted by NTIA. Staff worked expeditiously and to the best of their abilities to finalize and submit all responses to curing requests.

Between December 19, 2025, and July 15, 2026, NTIA and Staff conducted eight curing rounds for the Final Proposal and associated documents (see Appendix E). Staff received curing requests on the following dates:

¹ On June 12, 2026, the Commission issued the [Order Modifying Resolution T-17898 and Denying Rehearing, as Modified](#), which revised minor portions of the "Background" section of Resolution T-17898 to provide additional explanation for retaining certain locations served by unlicensed fixed wireless (ULFW) providers as eligible for BEAD funding. These revisions did not affect preliminary results or the BEAD Final Proposal.

² BEAD NOFO p. 49

1. Round 1 - December 19, 2025, December 29, 2025
2. Round 2 - January 22, 2026
3. Round 3 - February 2, 2026, February 3, 2026
4. Round 4 - February 12, 2026, February 13, 2026
5. Round 5 – March 16, 2026, March 17, 2026, March 19, 2026
6. Round 6 – March 27, 2026
7. Round 7 – May 28, 2026, June 23, 2026
8. Round 8 – July 13, 2026

The NTIA curing requests required Staff to update the Final Proposal and its associated attachments with additional information, clarifications, and updated subgrantee selection outcomes. The curing requests covered the following categories:

- Data Compliance Check
- Requirement 1: Subgrantee Selection Outcomes
- Requirement 3: Timeline for Implementation
- Requirement 4: Oversight and Accountability Processes
- Requirement 5: Local Coordination
- Requirement 6: Challenge Process Results
- Requirement 12: Substantiation of Priority Broadband Projects
- Requirement 13: Subgrantee Selection Certification
- Requirement 15: Consent from Tribal Entities
- Waivers

In addition to the Final Proposal revisions, NTIA requested revisions to the Final Proposal Funding Request (FPFR). The curing requests were structured in the following categories:

- Budget Narrative
- Consolidated Budget Form

Consistent with Resolution T-17898, Staff revised the Final Proposal solely to address NTIA's curing requests and did not introduce new programmatic elements or policy changes. On July 7, 2026, Staff submitted to NTIA the "Curing Request for Additional Cost Savings" letter which summarizes BEAD cost reductions due to NTIA curing requests, provides justification for California's BEAD program results, and requests a timely approval of the Final Proposal. The letter is attached hereto as Appendix F. On July 17, 2026, NTIA notified the Commission of its approval of California's Final Proposal and FPFR. That message of approval is attached hereto as Appendix G. Staff

now submit these revisions to the Commission for ratification through this Resolution. The complete text of the documents as-cured appear in the appendices hereto.

III. DISCUSSION

The Commission finds that Staff reasonably responded to and implemented NTIA's curing requests in a manner that is consistent with federal BEAD requirements, the authority granted in Resolution T-17898, and the Commission's prior approval of California's BEAD Final Proposal. Sections A and B below describe the substantive categories of curing requests and Staff's corresponding programmatic and budgetary responses, including additional factual findings regarding Staff's response to NTIA's rejection of certain subgrantee's match waiver requests and the steps taken to ensure continued service coverage for affected locations. Section C separately addresses the Commission's legal findings regarding federal compliance and delegated authority. The section that follows provides updates to project locations, award findings, and eligible location counts resulting from NTIA's curing determinations.

A. Scope and Reasonableness of Staff's Responses to NTIA Curing Requests

NTIA's curing requests primarily sought additional justification, clarification, or technical correction in discrete sections of the Final Proposal and associated documents. Staff's responses were specific and limited to the instructions that NTIA provided in the curing requests and did not alter the fundamental structure, goals, or priorities of California's BEAD program.

With respect to **Subgrantee Selection Outcomes**, NTIA requested additional justification for projects with costs exceeding specific reference estimate thresholds. Staff responded by providing project-specific explanations of cost drivers, confirming whether alternative priority or non-priority applications were received, and initiating targeted renegotiations where required. For specific projects NTIA identified as having excessive deployment costs, Staff followed NTIA guidance by conducting targeted negotiations with preliminary awardees to further reduce project costs. In response to NTIA's request to scrutinize overall BEAD program costs, Staff also undertook several additional cost reduction measures across the program. These efforts included conducting additional direct negotiations with preliminary awardees to reduce proposed deployment costs, removing locations from BEAD eligibility based on NTIA's assessment and Reason Code guidance, and reviewing approved and pending enforceable commitments to reassess the eligibility of locations for BEAD funding. Collectively, these actions demonstrate Staff's commitment to minimizing BEAD

deployment costs, ensuring the efficient use of federal funds, preserving competitive fairness, and maintaining adherence to federal guidance.

For **Timeline for Implementation, Oversight and Accountability, Challenge Process Results, Priority Project Substantiation, and Subgrantee Selection Certification**, Staff provided additional narrative detail or clarification as requested by NTIA. These revisions enhance transparency and administrative clarity without modifying substantive program decisions.

Regarding **Local Coordination**, Staff appropriately confirmed that no changes were made in response to public comment where none were warranted, consistent with internal review and legal guidance. NTIA's request was addressed through clarification rather than revision, which is reasonable and consistent with the factual record.

Staff's response to **Tribal Consent** curing requests appropriately reflects federal requirements under the BEAD NOFO, NTIA Restructuring Policy Notice, and NTIA's Programmatic Waiver of the Tribal Consent deadline. Staff included NTIA-requested narrative language and initiated direct outreach to preliminarily awarded subgrantees to ensure awareness of, and compliance with, Tribal Consent obligations following Final Proposal approval. These actions reasonably balance federal compliance with practical implementation considerations.

For **Waivers and Data Compliance Check** items, Staff corrected the NTIA-identified discrepancies and provided the clarifications requested by NTIA, ensuring alignment with NTIA's data validation standards. During the curing process for the Final Proposal, NTIA rejected four match waiver requests, requiring Staff to identify solutions to ensure service coverage for affected locations. The NTIA Match Waiver Determination is attached as Appendix D. In response, Staff implemented a multi-pronged strategy that included increasing match commitments, negotiating with alternative providers, and conducting location eligibility and classification analyses using NTIA's Reason Code process. Through these coordinated efforts, Staff identified solutions to address all impacted locations.

B. Final Proposal Funding Request and Budget Revisions

NTIA's curing requests related to the Final Proposal Funding Request (FPFR) and the associated Consolidated Budget Form primarily concerned consistency, level of detail, updates incorporating related curing changes, and alignment with updated federal guidance from NTIA, the National Institute of Standards and Technology (NIST), and

the Office of Inspector General (OIG). Staff responded by revising cost descriptions, reallocating costs to appropriate categories, and providing additional narrative justification where requested.

These revisions improve clarity and federal compliance while maintaining the administrative and budget structure previously approved by the Commission. The FPFR allocation reflects the same planning assumptions as the Initial Proposal Funding Request and remains consistent with federal funding limits.

C. Consistency with Federal BEAD Requirements and Commission Authority

The Commission finds that Staff's responses to NTIA's curing requests are reasonable, limited in scope, and fully consistent with federal BEAD requirements. Staff acted within the authority expressly granted by Resolution T-17898, which permits revisions solely in response to NTIA-identified deficiencies and requires Commission ratification of those revisions.

As a result of curing, California's revised Final Proposal includes a reduction of \$72,148,261 in terrestrial broadband deployment funding and a reduction of \$88,802,581 for low earth orbit satellite (LEO) funding. These funding reductions correspond to decreases of 4,161 terrestrial broadband serviceable locations (BSLs) and 65,081 LEO BSLs to be served by the BEAD program. This decrease in BSLs largely resulted from location eligibility changes, including BSL Fabric updates that identified specific BSLs as already served, reclassification of locations to align with NTIA Reason Code guidance, and the removal of locations no longer eligible for BEAD funding due to approved and pending enforceable commitments.³ In addition to these location eligibility updates, reductions in funding also reflect targeted negotiations with preliminary awardees to reduce costs for projects that NTIA identified as having excessive deployment costs. The table below summarizes the impact of curing process on BSLs and funding.

Impact of the Curing Process on BSLs and Funding

	Terrestrial BSLs	Terrestrial Funding	LEO BSLs	LEO Funding
Pre-curing	200,546	\$1,410,635,305	138,018	\$165,363,122
Post-curing	196,385	\$1,338,487,044	72,937	\$76,560,541

³ Due to NTIA Curing Requests (see Appendix E), the total number of eligible locations decreased primarily as a result of updates to the Broadband Serviceable Location Fabric and NTIA's request that California remove high-cost locations based on NTIA's determination that those locations were ineligible for BEAD funding under its Reason Code guidance.

Change	-4,161	-\$72,148,261	-65,081	-\$88,802,581
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California’s revised Final Proposal proposes awarding \$1,415,047,585, consisting of \$1,338,487,044 to build terrestrial broadband infrastructure to 196,385 locations, and \$76,560,541 for LEO service to 72,937 locations. Together, these projects are expected to reach 100% of eligible BEAD locations statewide, representing 137,569 unserved and 131,753 underserved eligible locations. Participating subgrantees will provide \$861,039,067 in matching funds, resulting in an average cost per broadband serviceable location of \$5,254. The Resolution recommends 83 projects for award.

Based on the record before it, the Commission concludes that Staff’s implementation of NTIA’s curing requests is reasonable, compliant with federal requirements, and necessary to secure NTIA approval of California’s BEAD Final Proposal.

COMMENTS

In compliance with Public Utilities Code Section 311(g), a Notice of Availability of this draft resolution was emailed on July 31, 2026, informing all parties on the R.23-02-016 Service List of the availability of this Resolution for public comments at the [Commission’s website](#). The notice letter also informed parties that the final conformed resolution adopted by the Commission will be posted on the same website.

On August 20, 2026, Staff received two comments on this Resolution from Further Reach Inc. (“Further Reach”) and Tarana Wireless, Inc. (“Tarana Wireless”). Staff did not receive any reply comments.

Further Reach’s Comments:

Further Reach requested that 872 locations associated with its Unlicensed Fixed Wireless Existing Service Claim CA-4540 be removed from Appendix B3 and added to Appendix B4 as locations served by Further Reach. Further Reach argues that the Commission’s July 31 exhibits identify 1,344 of the 2,348 locations in its claim as served by a non-subsidized provider, while the remaining 872 locations are still listed as eligible for BEAD-funded overbuild. According to Further Reach, the same network, equipment, provider, and supporting evidence apply to all 2,348 locations and, therefore, the remaining 872 locations should receive the same treatment as the 1,344 locations already removed from Appendix B3.

Tarana Wireless' Comments:

Tarana Wireless proposes that the CPUC take actions to provide subgrantees and their partners with the resources to facilitate successful project implementation, including publishing a timeline for executing subgrantee agreements within 30 days of the ratification of the Resolution, making the subgrantee agreement publicly available for viewing, and publishing reimbursement terms and timelines. Additionally, Tarana Wireless requests that the CPUC open bidding to prequalified applicants to replace any subgrantee that fails for any reason to implement its project. In connection with this request, Tarana Wireless notes that Ordering Paragraph 2 should be amended to state that any reassignment of a project area to a different provider must be ratified by the Commission.

Staff's Response to Comments:

Staff do not have discretion to remove the 872 locations as part of this Resolution. Consistent with the authority granted to Staff in Resolution T-17898, the purpose of Resolution T-17920 is to ratify revisions to the BEAD Final Proposal based on curing requests from NTIA. Thus, any removal of locations from Appendix B3 and any changes to the BEAD Final Proposal were made at the direction of NTIA. NTIA made no curing requests involving the 872 locations identified by Further Reach, thus Staff did not re-evaluate these locations as part of Resolution T-17920.

NTIA has now approved all locations in Appendix B3, including the 872 locations, and the Assistant Secretary of Commerce for Communications and Information has approved the Commission's BEAD Final Proposal. Therefore, no changes to the draft Resolution are warranted based on Further Reach's comments.

Staff evaluated Tarana Wireless' comments. As demonstrated throughout the BEAD program, California has provided and will continue to provide information and guidance necessary to support successful project implementation. Any changes to the subgrantee selection would require Staff to seek approval from NTIA, which has already formally approved California's Final Proposal. Staff also notes that any change in subgrantee will require both NTIA and Commission approval.⁴ Accordingly, no changes to Ordering Paragraph 2 are necessary in response to comments.

FINDINGS AND CONCLUSIONS

1. On December 18, 2025, the Commission approved [Resolution T-17898](#), which approved the BEAD Final Proposal and authorized Staff to submit the BEAD Final

⁴ [BEAD Scope Change and Budget Modification Primer](#)

Proposal to NTIA, authorized Staff to propose cures to address items identified by NTIA, and required Staff to submit revisions made to address NTIA's curing requests to the Commission via resolution for ratification.

2. On December 19, 2025, Staff submitted the BEAD Final Proposal to NTIA.
3. Between December 19, 2025, and July 15, 2026, NTIA conducted eight curing rounds for the BEAD Final Proposal and associated documents (see Appendix E).
4. California's revised Final Proposal proposes awarding \$1,415,047,585, consisting of \$1,338,487,044 to build terrestrial broadband infrastructure to 196,385 locations, and \$76,560,541 to serve 72,937 additional locations via LEO service. Together, these projects are expected to reach 100% of eligible BEAD locations statewide, representing 137,569 unserved and 131,753 underserved eligible locations.
5. As a result of curing, California's revised Final Proposal reflects a decrease of \$72,148,261 to build terrestrial broadband infrastructure to 4,161 fewer locations, and a decrease of \$88,802,581 for LEO service to 65,081 fewer locations.
6. All projects awarded in the Final Proposal met minimum eligibility requirements provided in [Decision 23-02-016](#) and [Decision 25-07-040](#).
7. The projects 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.
8. On July 7, 2026, the CPUC submitted a letter to NTIA titled "Curing Request for Additional Cost Savings," providing justification for California's BEAD program results and requesting NTIA's timely review and approval of California's BEAD Final Proposal (see Appendix F).
9. On July 17, 2026, NTIA notified the Commission of its approval of California's Final Proposal and FPFR (see Appendix G).
10. The revised Final Proposal recommended by Staff is reasonable, consistent with federal BEAD requirements, and should be ratified by the Commission.

11. No revisions were made to the Environmental and Historic Preservation Plan or the Draft Grant Agreement due to the curing process.
12. Draft Resolution T-17920 was emailed to the R.2302016 Service List on July 31, 2026, in compliance with Public Utilities Code Section 311(g)(1). The Commission timely received 2 public comments. Staff did not receive any reply comments.

THEREFORE, IT IS ORDERED THAT:

1. The Commission ratifies the revised BEAD Final Proposal as set forth in Appendices A, B, and C hereto.
2. The Commission delegates to Staff the authority to take any ministerial action necessary to implement and effectuate California's BEAD program, consistent with the revised Final Proposal and legally applicable federal and California statutes, regulations, and guidance.⁵
3. Any future deployment changes requiring NTIA approval, including other program elements and any supplemental deployment activities, shall, following NTIA approval, be submitted by Staff to the Commission for ratification via resolution on an annual basis, or more frequently as necessary.

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 September 17, 2026; the following Commissioners voting favorably thereon:

Dated _____, at <Voting meeting location>, California

⁵ E.g., BEAD Restructuring Policy Notice, p.1, Footnote 2, reads, "This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements. In all cases, statutory and regulatory mandates shall prevail over any inconsistencies contained in this document."

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 – [BEAD Program Monitoring Plan \(4.2\)](#)

APPENDIX D – [NTIA Match Waiver Determination](#)

APPENDIX E – [NTIA Curing Requests](#)⁶

APPENDIX F – [Curing Request for Additional Cost Savings](#)

APPENDIX G – [NTIA Approval of Final Proposal](#)

⁶ Users must first download the document to a computer or device to access the embedded attachments. When viewed in a browser, users will be able to see that attachments are present, but cannot open them until the document has been downloaded. This is unique to Appendix E, as it is the appendix that contains embedded attachments.