U.S. TERRITORY OF AMERICAN SAMOA
BROADBAND, COORDINATION,
OPPROTUNITIES, REDEVELOPMENT AND
DEPLOYMENT OFFICE

AMERICAN SAMOA
BEAD FINAL PROPOSAL DRAFT

FOR PUBLIC COMMENT

August 28, 2025

Version 1.0



Disclaimer

This document is a draft and its contents, including financial information, subgrantee award conditions, and commitments, are subject to change until NTIA approval. Funding amounts and locations may be adjusted after location verification and prior to contract finalization.

Public Comment

The Broadband Coordination Opportunities Redevelopment and Deployment (BCORD) Office of American Samoa Department of Commerce welcomes comments and input on the American Samoa BEAD Final Proposal.

Funding amounts and locations may be adjusted after location verification and prior to subgrantee agreement finalization.

Submit a Comment in one of two ways:

1. Email your comments to bcord@doc.as.gov
2. Submit Comments via our Google Form: https://forms.gle/8uSGTUUncf2REkws7

BEAD Virtual Town Hall

Join us on Tuesday, September 2nd for a virtual townhall as the BCORD Office presents the BEAD Final Proposal for the territory, welcoming any comments and/or input from the public.

Event: BEAD Virtual Town Hall
Date: September 2, 2025
Time: 10:00 am
Click Link to Register: https://forms.gle/xfZgPYHdwav2NeXJ6

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Introduction

The American Samoa Department of Commerce, through its Broadband Coordination Office (BCORD) is pleased to submit this Final Proposal for the Broadband Equity, Access, and Deployment (BEAD) Program. The BEAD Program, established under the Infrastructure Investment and Jobs Act (IIJA) and administered by the National Telecommunications and Information Administration (NTIA), provides a once-in-a-generation opportunity to close the digital divide. With $42.45 billion in nationwide funding, BEAD supports states and territories in delivering reliable, high-speed internet service to unserved and underserved communities.

American Samoa has been allocated approximately $37 million under the BEAD Program to expand broadband infrastructure and ensure that residents, businesses, and institutions have access to affordable, high-quality internet. This funding is critical for the Territory, where geographic isolation, high deployment costs, and infrastructure challenges have historically limited broadband availability. Through strategic investments, American Samoa will focus on extending fiber and other scalable technologies to households, community anchor institutions, and areas most in need, while also supporting workforce development and digital equity efforts.

This Final Proposal represents the culmination of extensive planning, community engagement, and coordination with federal partners. It outlines American Samoa's priorities, identifies subgrantees, and provides a roadmap for monitoring and compliance to ensure transparent and effective use of funds. Above all, the proposal reflects the Territory's commitment to building a stronger, more connected future, where every resident can participate fully in the digital economy and access the opportunities made possible through broadband connectivity.

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0. Final Proposal Data Submission

0.1 Attachment (Required): Complete and submit the Subgrantees CSV file (named "fp_subgrantees.csv") using the NTIA template provided.

Click Here to access the American Samoa BEAD Final Proposal Data

0.2 Attachment (Required): Complete and submit the Deployment Projects CSV file (named "fp_deployment_projects.csv") using the NTIA template provided.

Click Here to access the American Samoa BEAD Final Proposal Data

0.3 Attachment (Required): Complete and submit the Locations CSV file (named "fp_locations.csv") using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations .

Click Here to access the American Samoa BEAD Final Proposal Data

0.4 Attachment (Required): Complete and submit the No BEAD Locations CSV file (named "fp_no_BEAD_locations.csv") using the NTIA template provided. The Location IDs in this list must match the NTIA-approved final list of eligible locations.

Click Here to access the American Samoa BEAD Final Proposal Data

0.5 Question (Y/N): If the Eligible Entity intends to use BEAD funds to serve CAIs, does the Eligible Entity certify that it ensures coverage of broadband service to all unserved and underserved locations, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2)?

Yes

0.6 Attachment (Required – Conditional on a 'Yes' Response to Intake Question 0.5): Complete and submit the CAIs CSV file (named "fp_cai.csv") using the NTIA template provided. Although CAIs are not included under (f)(1) deployment projects, to confirm the Eligible Entity's compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTIA template is required. The Eligible Entity must only include CAIs funded via BEAD in this list; the Eligible Entity may not propose funding CAIs that were not present on the approved final list from the Eligible Entity's Challenge Process results.

Click Here to access the American Samoa BEAD Final Proposal Data

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1. Subgrantee Selection Process Outcomes (Requirement 1)

1.1. Text Box: Describe how the Eligible Entity's deployment Subgrantee Selection Process undertaken is consistent with that approved by NTIA in Volume II of the Initial Proposal as modified by the BEAD Restructuring Policy Notice (RPN).

Subgrantee Selection Process

The BCORD Office Subgrantee Selection Process was planned to be consistent and in compliance with the American Samoa BROADBANDiNEI Initial Proposal Volume 2 and the June 6, 2025, BEAD Restructuring Policy Notice (RPN). BCORD established and followed a process that was fair, transparent, neutral and competitive. The BEAD Deployment Application Process was done in two (2) phases. The Pre-Qualification Phase and the Deployment Application Phase.

Application Portal: SimpliGov

The BCORD utilized SimpliGov to house all our BEAD applications. This covered the Challenge Phase, as well as the BEAD Deployment Pre-Qualification, and Benefit of the Bargain Rounds.

Applicants were able to launch the portal via a link hosted on our website at broadband.as.gov.

The Pre-Qualification Phase was designed to establish each applicant's capacity to successfully carry out a broadband project. In accordance with the BEAD NOFO, all interested applicants were required to demonstrate financial, managerial, and technical capability. Applicants who met these requirements were permitted to advance and submit full deployment project proposals.

The Pre-Qualification Phase was open from April 30, 2025, through June 30, 2025, providing a two-month window. During this period, on June 6, 2025, the BEAD RPN was released. Following the release, the BCORD Office issued a public notice formally notifying all BEAD stakeholders and potential applicants of the changes. To ensure fairness and broad participation, the pre-qualification window remained open until the original deadline of June 30, 2025. To keep the application process open and fair, BCORD ensured to allow any new applicants who joined the pool during the Benefit of the Bargain Round the opportunity to submit qualifying documentation at that time.

BCORD hosted weekly BEAD Office Hours to provide applicants and stakeholders with direct access to program updates All questions received during these Office Hours were documented and shared via Frequently Asked Questions (FAQs), as well as through Office Hour Slides, that were shared at the end of every meeting and posted via our website at broadband.as.gov. These sessions ensured that all interested parties had the information and guidance necessary to submit complete and compliant proposals.

The Deployment Application Phase, also referred to as the Benefit of the Bargain Round, was conducted in accordance with the BEAD Restructuring Policy Notice, which required states and territories to open or reopen their application phases. In compliance with this mandate,

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American Samoa's Benefit of the Bargain Round was open for 18 days, from July 11, 2025, through July 28, 2025.

Initial Reviews and Curing Timeframe:

Initial Reviews: Once applications were received, the BCORD Office conducted an initial review to ensure each submission was complete.

The table below was used to review key areas of the application and to provide feedback as needed.

Table: [1] Initial Review Feedback Table

American Samoa 2025 BEAD Application		
APPLICATION ID		
ORGANIZATION		
DUE DATE		
Section	**Complete/Incomplete**	**Feedback**
General Organization Information (1-8)	Complete/ Incomplete	
Point of Contact (9-16)	Complete/ Incomplete	
Authorized Representative Contact (17-23)	Complete/ Incomplete	
Project Proposal	Complete/ Incomplete	
Project Funded Areas & Technology Types	Complete/ Incomplete	
Detailed Project Budget & Financial Information	Complete/ Incomplete	
Network Network and Technical Design Plan Comment	Complete/ Incomplete	

[1] Table 1: BEAD Initial Review Application Checklist, (August 6, 2025).

Project Timeline & Milestones	Complete/ Incomplete	
Attachments & Supporting Documentation	Complete/ Incomplete	

Curing Timeline: Applicants were given 10 days to make the requested revisions, with the opportunity to incorporate any additional changes or adjustments as needed. Once this was completed, the BCORD Office gathered all the required information to conduct its final assessment and deliberations.

American Samoa BEAD Timeline:

April 1, 2025	Initial Broadband Map Release
April 15, 2025	Initial Pre-Qualification Application Open
June 6, 2025	BEAD Restructuring Policy Notice
June 18, 2025	Notice to ULFW for Notice of Intent Open
June 25, 2025	ULFW for Notice of Intent Close
June 30, 2025	BEAD Pre-Qualification Closes
July 3, 2025	ULFW BSL & Technical Documentation Due
July 11, 2025	Benefit of the Bargain Round Opens
July 28, 2025	Benefit of the Bargain Round Closes
August 8, 2025	BEAD Middle Mile Deployment Application Open
August 18, 2025	BEAD Middle Mile Deployment Application Close
August, 19 2025	BEAD Application Review Opens
August 25, 2025	BEAD Application Review Closes
August 28, 2025	Final Proposal Public Comment Period Opens
September 4, 2025	Final Proposal Public Comment Period Closes
September 4, 2025	BEAD Final Proposal Submission Deadline to NTIA

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Image [2]



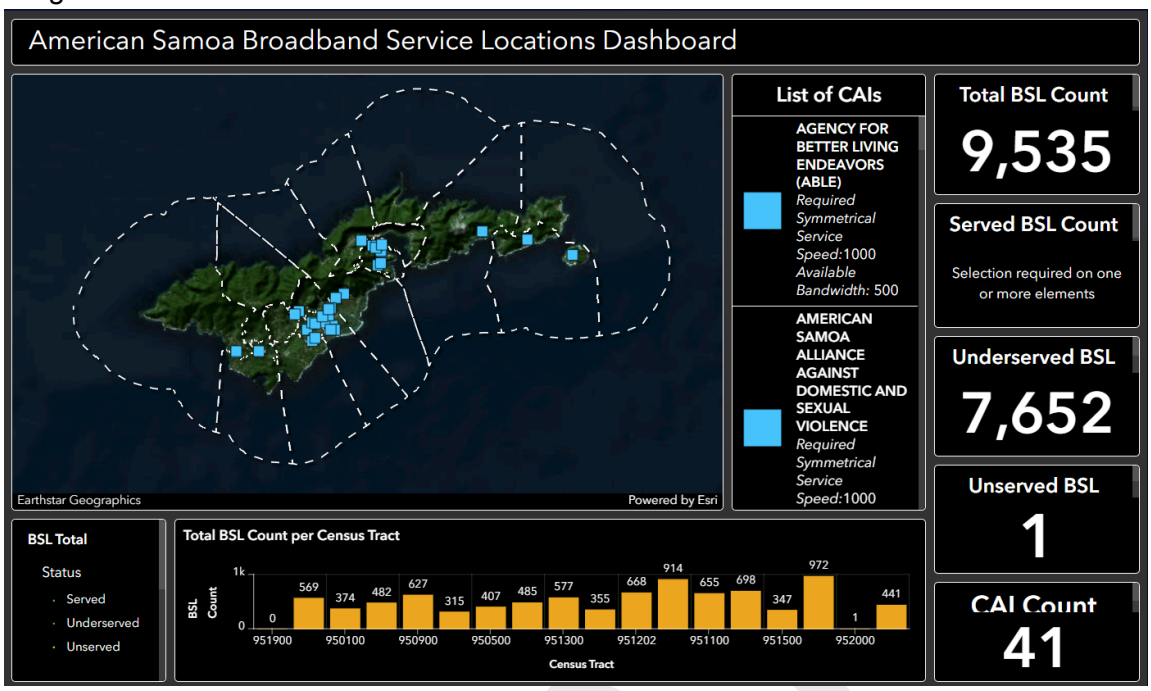
Project Funded Areas:

The BCORD Office defined Project Funded Areas (PFAs) based on the U.S. Census Tracts. American Samoa comprises 17 tracts, and each was used as a geographic unit for organizing eligible broadband locations.

Using these tracts, the BCORD Office mapped all broadband serviceable locations (BSLs) and community anchor institutions in the American Samoa Broadband Map. The Broadband Map, identified a total of 9,535 locations, of which 7653 locations have been identified as unserved and underserved. This finalized map was released on April 1, 2025.

[2] Image 1: BEAD Tentative Timeline, (August 6, 2025). https://www.doc.as.gov/broadband

Image [3]



In addition to the release of the Broadband Map. BCORD also released the Public Funded Areas Summary Guide which was created to assist interested applicants in their review of the American Samoa locations. The summary outlines the available PFAs for bid.

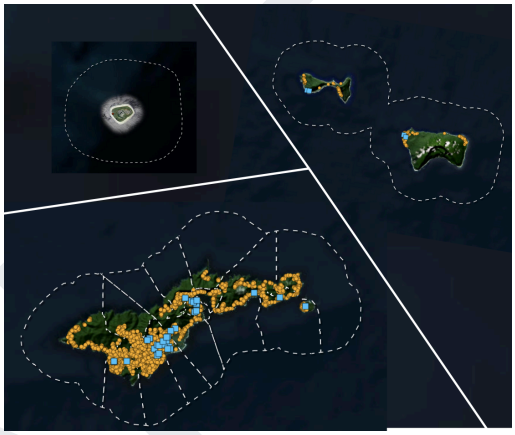
In accordance with the BEAD RPN the BCORD Office rereleased the American Samoa Broadband Maps prior to the start of the Benefit of the Bargain Round on July 11, 2025 to July 28, 2025. The map and updated summary sheet was shared via the broadband.as.gov website.

There are 7,653 broadband serviceable locations (BSLs) across the 17 PFAs, including 41 locations identified as eligible community anchor institutions (CAIs).

The Broadband Map and accompanying Project Funded Areas Summary identifies locations eligible for BEAD funding, classifying them as unserved, underserved, or Community Anchor Institutions (CAIs). This data will help guide funding decisions for broadband expansion projects.

[3] Image 2: American Samoa Broadband Service Locations Dashboard, (August 12, 2025). https://www.arcgis.com/apps/dashboards/8def3c64265e4a59aba0d8c37dea4650

Table: Total Project Funded Area Summary [4]

Total Project Funded Area Summary		
#	Total Census Tracts: 17 Total Funded BSLs: 7,653 Total Unserved: 1 Total Underserved: 7652 Total CAIs: 41 Location: Tutuila, Manu'a and Swains Island (Olohega)	

1.2. Text Box: Describe the steps that the Eligible Entity took to ensure a fair, open, and competitive process, including processes in place to ensure training, qualifications, and objectiveness of reviewers.

The BCORD Office has conducted a fair, open, transparent, and competitive BEAD Subgrantee Selection Process. Public comment was invited at every step and milestone, including the Challenge Process, Broadband Comment Period, Unlicensed Fixed Wireless notice, Weekly Office Hours, regularly updated FAQs, stakeholder engagements, and more.

To safeguard against collusion, bias, conflicts of interest, and arbitrary decisions, the BCORD Office has confirmed that all application reviewers are free of conflicts of interest and will not engage in any business or actions that could create such conflicts.

- Any application will be disqualified if an applicant or its representatives attempt to inappropriately influence the grant process or engage in collusion.
- Applicants must fully disclose any real, apparent, or perceived conflicts of interest as required under American Samoa law.

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- Federal conflict-of-interest regulations also apply, including **2 CFR 200.318**, **2 CFR 200.112**, and **24 CFR 570.489(h)**.
- Prospective subgrantees are required to attest to these terms as part of their application.
- A conflict of interest would arise, for example, if an employee, an immediate family member, or a partner has a financial or other interest in the firm selected for award.

In response to the BEAD Restructuring Policy and the adoption of a new scoring rubric, the BCORD Office adjusted its selection process. While the original plan is to convene a Community Panel Review, as is standard practice for the American Samoa Department of Commerce, the decision-making responsibility was retained by the BCORD Office staff, as it holds institutional knowledge specific to the BEAD Program and its regulatory requirements, as well as direct expertise in the program's intended outcomes. Their specialized understanding ensured that application reviews were aligned with both federal compliance obligations and the Territory's broadband needs.

The BCORD Office will disqualify an application if applicants or any of their representatives attempt to inappropriately influence the grant process or collude in any way.

Fairness. The BROADBANDiNEI has included a broad set of safeguards to ensure a fair Benefit of the Bargain Round that is free of conflicts of interest (COI), direct or indirect collusion amongst applicants and biased or otherwise arbitrary outcomes. As applicable by American Samoa law, applicants must fully disclose any real or apparent (perceived) COIs. In addition to these generally applicable requirements, the BCORD requires attestation from prospective subgrantees that will include the acceptance of these terms. Such a conflict would arise when the employee, any member of his (her) immediate family, his or her partner, has a financial or other interest in the firm selected for award" (2 CFR 200.318). Other federal regulations with which the grantee must comply are the conflict-of-interest requirements in 2 CFR 200.112 and 24 CFR 570.489(h).

Openness. The BCORD Office will welcome the participation of any type of provider authorized to provide broadband service in American Samoa, including for-profit entities, co-operatives and public-private partnerships as enabled by local laws. The BCORD Office emphasizes the competitiveness of subgrant awards and thereby delivers the most impact for American Samoa. The scoring elements described in 2.4.2 are not only based on neutral criteria but are objectively algorithmic in nature, such as the award of points based on the maximum percent of BEAD funding objectively. Qualitative scoring components such as fair labor are also neutral criteria that will be made public in advance of applications.

To ensure public transparency for all program activities. The BCORD Office has provided public notices, open office hours, and posted notices regularly on our website and via our social media pages for all interested parties.

The BCORD Office staff currently hold institutional knowledge and expertise pertaining to BEAD regulation requirements, and are the best equipped to make the decision for the territory.

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1.3. Text Box: Affirm that, when no application was initially received, the Eligible Entity followed a procedure consistent with the process approved in the Initial Proposal.

Not Applicable.

1.4. Text Box: If applicable, describe the Eligible Entity's methodology for revising its eligible CAI list to conform with Section 4 of the BEAD Restructuring Policy Notice.

In alignment with the BEAD RPN, the list of community anchor institutions (CAIs) was reviewed. As per the original definition in the IIJA, community anchor institutions are defined as "*community support organization*". Of the 41 locations, none of the locations were removed from the CAI listing. Each location and organization at its core serves as a community support organization at a certain capacity.

1.5. Question (Y/N): Certify that the Eligible Entity will retain all subgrantee records in accordance with 2 C.F.R. § 200.334 at all times, including retaining subgrantee records for a period of at least 3 years from the date of submission of the subgrant's final expenditure report. This should include all subgrantee network designs, diagrams, project costs, build-out timelines and milestones for project implementation, and capital investment schedules submitted as a part of the application process.

Yes. The BCORD Office certifies to retain all subgrantee records in accordance with 2 C.F.R. § 200.334 at all times, including retaining subgrantee records for a period of at least three years from the date of submission of the subgrant's final expenditure report. This will include network designs, diagrams, project costs, build-out timelines and milestones for project implementation, and capital investment schedules submitted as a part of the application process. The BCORD Office retains both a digital archive and physical files.

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3. Timeline for Implementation (Requirement 3)

3.1. Text Box: Has the Eligible Entity taken measures to: (a) ensure that each subgrantee will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant; (b) ensure that all BEAD subgrant activities are completed at least 120 days prior to the end of the Eligible Entity's period of performance, in accordance with 2 C.F.R. 200.344; and (c) ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by the end of the period of performance for its award, in accordance with 2 C.F.R. 200.344.

Yes, the BCORD Office has added the following measures to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant. In proposal submissions we included key Project Timeline & Milestones.

a. Four-Year Service Commitment:

   Subgrantees are required to achieve full deployment of broadband infrastructure

b. 120-Day Subgrant Completion Before Period End

c. Eligible Entity Award-Period Completion

4. Oversight and Accountability Processes (Requirement 4)

4.1. Question (Y/N): Does the Eligible Entity have a public waste, fraud, and abuse hotline, and a plan to publicize the contact information for this hotline?

Y/N QUESTION

4.2. Attachments: Upload the following two required documents:

4.2.1 BEAD Program Monitoring Plan

4.2.2 Agency Policy Documentation

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4.2.2.1 Distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize) or on a basis determined by the terms and conditions of a fixed amount subaward agreement; and

4.2.2.2 Timely subgrantee (to Eligible Entity) reporting mandates.

ATTACHMENTS

4.3. Question (Y/N): Subgrant-Agreement Conditions Certification. Certify that the subgrant agreements will include, at a minimum, the following conditions:

a. Compliance with Section VII.E of the BEAD NOFO, as modified by the BEAD Restructuring Policy Notice, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;

b. Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;

c. Compliance with all relevant obligations in the Eligible Entity's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the Eligible Entity's BEAD award;

d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;

e. Subgrantee accountability practices that include the use of clawback provisions between the Eligible Entity and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);

f. Mandate for subgrantees to publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) and/or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. This includes an acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer; and

g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to

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ensure that subgrantee performance is consistently assessed and tracked over time.

Yes, the BCORD Office certifies that all BEAD Subgrant agreements will at a minimum include all the above required conditions to comply with the BEAD NOFO and the BEAD Restructuring Policy Notice.

5. Local Coordination (Requirement 5)

5.1. Text Box: Describe the public comment period and provide a high-level summary of the comments received by the Eligible Entity during the public comment period, including how the Eligible Entity addressed these comments.

Not Applicable

6. Challenge Process Results (Requirement 6)

6.1. Question (Y/N): Certify that the Eligible Entity has successfully completed the BEAD Challenge Process and received approval of the results from NTIA.

Yes

6.2. Text Box: Provide a link to the website where the Eligible Entity has publicly posted the final location classifications (unserved/underserved/CAIs) and note the date that it was publicly posted.

The Challenge Results can be found here. The lists can also be found at our main website at broadband.as.gov.

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7. Unserved and Underserved Locations (Requirement 7)

Coverage of Unserved Locations

7.1. Question (Y/N): Certify whether the Eligible Entity will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2).

Yes. The BCORD Office hereby certifies the coverage of all unserved locations within the American Samoa territory as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2).

7.2. Text Box: If the Eligible Entity does not serve an unserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.

Not Applicable

7.3. Attachment (Optional): If applicable to support the Eligible Entity's response to Question 7.2., provide relevant files supporting the Eligible Entity's determination.

Not Applicable

Coverage of Underserved Locations

7.4. Question (Y/N): Certify whether the Eligible Entity will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2).

Yes. The BCORD Office hereby certifies the coverage of all broadband services to all underserved locations within the American Samoa territory as identified in the NTIA-approved final list of eligible locations and required under 47 U.S.C. § 1702(h)(2).

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7.5. Text Box: ***If the Eligible Entity does not serve an underserved location because it is either financially incapable or has determined that costs to serve the location would be unreasonably excessive, explain and include a strong showing of how the Eligible Entity made that determination.***

Not Applicable

7.6. Attachment (Optional): ***If applicable to support the Eligible Entity's response to Question 7.5, provide relevant files supporting the Eligible Entity's determination.***

Not Applicable

7.7. Question (Y/N): ***Certify that the Eligible Entity has utilized the provided reason codes to investigate and account for locations that do not require BEAD funding, that the Eligible Entity will utilize reason codes 1, 2, and 3 for the entire period of performance, and that the Eligible Entity will maintain documentation, following the guidelines provided by NTIA, to justify its determination if there is a reason to not serve any unserved or underserved location on the NTIA-approved Challenge Process list through a BEAD project. The documentation for each location must be relevant for the specific reason indicated by the Eligible Entity in the fp_no_BEAD_locations.csv file. The Eligible Entity shall provide the documentation for any such location for NTIA review, as requested during Final Proposal review or after the Final Proposal has been approved.***

Not Applicable

7.8. Question (Y/N): ***Certify that the Eligible Entity has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that the Eligible Entity was notified of and did not object to, and/or federally-funded awards for which the Eligible Entity has discretion over where they are spent (e.g., regional commission funding or Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects.***

Not Applicable

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11. Implementation Status of Plans (Requirement 11)

***11.1. Text Box:* Provide the implementation status (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment.**

In Progress

***11.2. Question (Y/N):* Affirm that the Eligible Entity required subgrantees to certify compliance with existing federal labor and employment laws.**

Yes

***11.3. Text Box (Optional – Conditional on a 'No' Response to Intake Question 11.2):* If the Eligible Entity does not affirm that subgrantees were required to certify compliance with federal labor and employment laws, explain why the Eligible Entity was unable to do so.**

N/A

***11.4. Question (Y/N):* Certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10-year Federal interest period.**

Yes

***11.5. Text Box (Optional – Conditional on a 'No' Response to Intake Question 11.4):* If the Eligible Entity does not certify that all subgrantees selected by the Eligible Entity will be required to offer a low-cost broadband service option for the duration of the 10- year Federal interest period, explain why the Eligible Entity was unable to do so.**

N/A

***11.6. Question (Y/N):* Certify that all subgrantees have planned for the reliability and resilience of BEAD-funded networks.**

Yes

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11.7 Text Box (Optional – Conditional on a 'No' Response to Intake Question 11.6): If the Eligible Entity does not certify that subgrantees have ensured planned for the reliability and resilience of BEAD-funded networks in their network designs, explain why the Eligible Entity was unable to do so.

Not Applicable

12. Substantiation of Priority Broadband Projects (Requirement 12)

12.1. Text Box: Describe how the Eligible Entity applied the definition of Priority Project as defined in the Infrastructure Act and the BEAD Restructuring Policy Notice.

1. **Priority Broadband Project Definition:**

American Samoa Priority Broadband Projects were identified first and foremost according to the definition by the BEAD Restructuring Policy Notice and the Infrastructure Investment and Jobs Act.

Projects were selected using a technology-neutral approach, meaning that all types of broadband technologies were reviewed and given equal consideration.

Priority Broadband Projects are defined as networks that are able to:

- Deliver high-speed broadband: Minimum 100 Mbps download / 20 Mbps upload.
- Maintain low latency: ≤ 100 milliseconds to support real-time applications.
- Be scalable: Able to accommodate future increases in bandwidth demand, deployment of 5G and next-generation wireless technologies, and other advanced digital services.
- Meet evolving connectivity needs: Supporting both homes and businesses.
- **Ensure Resiliency:** Networks are built to withstand hurricane force winds, heavy rains, landslides, earthquakes, tsunamis, and other natural disasters.
- **National Security Considerations:** American Samoa, as the southernmost outpost of the United States, occupies a critical geostrategic position in the Pacific. This location leaves the U.S. vulnerable as China expands its infrastructure and influence across neighboring islands. In this context, unsecured or inadequate aerial broadband infrastructure in the territory presents a potential national security risk.

Priority Broadband Projects:

- Buried Optical Carrier/ Fiber to the Premises (50)

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- Licensed Terrestrial Fixed Wireless (71)

Non-Priority Broadband Projects:

- Unlicensed Terrestrial Fixed Wireless (70)
- Non-Geostationary Satellite (60)

Table: BEAD Preliminary Awardee by Priority Broadband Project [5]

Priority Broadband Project	Applicant	Coverage	Technology / Notes	Rationale for Priority
Priority Broadband Project	American Samoa Telecommunications Authority	6916 locations	Fiber-based deployment; most cost-effective solution. Covers BSLs & CAIs	Supports fiber and lowest cost; is able to cover a majority of project areas.
Priority Broadband Project	AST Telecom LLC, dba Bluesky Communications	303 locations	Fills gaps left by ASTCA; may not match cost/fiber criteria. Supports fiber to the premises	Complements primary provider by covering remaining priority areas. The current proposal only covers five (5) project funded areas.
Non-Priority Broadband Project	Space Exploration Technologies Corp.	434 locations	Ensures full coverage; does not meet primary cost/fiber criteria	Provides coverage where no priority providers are available

13. Subgrantee Selection Certification (Requirement 13)

13.1. Text Box: Provide a narrative summary of how the Eligible Entity applied the BEAD Restructuring Policy Notice's scoring criteria to each competitive project application and describe the weight assigned to each Secondary Criteria by the Eligible Entity. Scoring criteria must be applied consistent with the prioritization framework laid out in Section 3.4 of the BEAD Restructuring Policy Notice.

Scoring Criteria Application & Weights

The BCORD Office reviewed all applications against the scoring criteria as stated in the BEAD Restructuring Policy Notice.

[5] Table: BEAD Preliminary Awardee by Priority Broadband Project

Primary Criteria:

BEAD Minimal Outlay (100%): Full points shall be awarded to the applicant who proposes the lowest overall cost to the Program.

If additional applications are within 15% of the application with the lowest overall cost to the Program, the lowest cost application and those applications shall move to the second round of scoring, all starting with equal points.

Secondary Criteria:

Speed to Deployment: Applications that commit to the deployment of a network and provide services to each BSL within the Project Funding Area within four years from the date of the grant agreement with BCORD. Speed to deployment will be scored on a sliding scale based on the timeline(s) for completed deployment within a Project Funding area as demonstrated in the table below. Additionally, service milestone(s) must be committed within the applications and will measure progress made throughout the project period. These service milestones will be audited by BCORD quarterly and will be used to determine responses to requests for periodic disbursement payments by the subgrantee. Payments will not be authorized unless committed service milestones are met.

Time	Points
0-1 years contract award to project close out	5
>1 but ≤ 2 years contract award to project close out	4
>2 but ≤ 3 years contract award to project close out	3
>3 but ≤ 4 years contract award to project close out	2
4 years+	0

Max Points: 5

Speed of Network and Other Technical Capabilities:

The BCORD Office may weigh the speed, latency, and other technical capabilities of the technologies proposed by prospective subgrantees.

Speed	Points
≤ 100/20 Mbps	0 point

100+/20+ Mbps	2 points

2 Points Max

Latency	Points
≤100ms	2 points
100ms or above	0 point

2 Points Max

Max Points for Speed of Network and Other Technical Capabilities: 4 points

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Speed of Network and Other Technical Capabilities

14. Environmental and Historic Preservation (Requirement 14)

14.1 Attachment (Required): Submit a document which includes the following:

- ***Description of how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's National Environmental Policy Act (NEPA) guidance. The methodology must reference how the Eligible Entity will use NTIA's Environmental Screening and Permitting Tracking Tool (ESAPTT) to create NEPA project records, evaluate the applicability of categorical exclusions, consider and document the presence (or absence) of Extraordinary Circumstances, and transmit information and draft NEPA documents to NTIA for review and approval.***
- ***Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.***
- ***Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant chapter of the FirstNet Regional Programmatic Environmental Impact Statement (PEIS), available at https://www.firstnet.gov/network/environmental-compliance/projects/regionalprogrammatic-environmental-impact-statements.***
- ***Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.***
- ***Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.***

Attachment: EHP Documentation (see Section "EHP Compliance Plan")

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15. Consent from Tribal Entities (Requirement 15)

15.1. Attachment(s) (Required if any deployment project is on Tribal Lands): Upload a Resolution of Consent from each Tribal Government (in PDF format) from which consent was obtained to deploy broadband on its Tribal Land. The Resolution(s) of Consent submitted by the Eligible Entity should include appropriate signatories and relevant context on the planned (f)(1) broadband deployment including the timeframe of the agreement. The Eligible Entity must include the name of the Resolution of Consent PDF in the Deployment Projects CSV file.

Not Applicable

16. Prohibition on Excluding Provider Types (Requirement 16)

16.1. Question (Y/N): Does the Eligible Entity certify that it did not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for a BEAD subgrant, consistent with the requirement at 47 U.S.C. § 1702(h)(1)(A)(iii)?

Eligibility Certification

17. Waivers

17.1. Text Box: If any waivers are in process and/or approved as part of the BEAD Initial Proposal or at any point prior to the submission of the Final Proposal, list the applicable requirement(s) addressed by the waiver(s) and date(s) of submission. Changes to conform to the BEAD Restructuring Policy Notice should be excluded. If not applicable to the Eligible Entity, note 'Not applicable.'

Not Applicable

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17.2. Attachment (Optional): If not already submitted to NTIA, and the Eligible Entity needs to request a waiver for a BEAD program requirement, upload a completed Waiver Request Form here. If documentation is already in process or has been approved by NTIA, the Eligible Entity does NOT have to upload waiver documentation again.

Not Applicable

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2. CSV Data Attachments

Each CSV must use US-ASCII characters, no embedded line breaks, and follow these header rows exactly.

2.1 fp_subgrantees.csv

state,uei,uei_name,frn

2.2 fp_deployment_projects.csv

state,project_name,project_id,uei,project_description,project_type,priority_broadband_project,estimated_miles_aerial_fiber,estimated_miles_buried_fiber,estimated_jobs,estimated_subaward_date,estimated_performance_start,estimated_performance_end,intersect_tribal,tribal_names,projected_BEAD_funding,fixed_amount_subaward,subgrantee_match,federal_match,state_match,other_match,federal_match_sources,notes

2.3 fp_locations.csv

location_id,project_id,location_classification,technology_code,upload_speed_anticipated,download_speed_anticipated,low_latency

2.4 fp_no_BEAD_locations.csv

location_id,location_classification,reason,non_bsl_code,location_type,financial_type,evidence_type,provider_id,technology,program,challenge_id,notes

2.5 fp_cai.csv (Required only if serving CAIs)

type,entity_name,location_id,project_id,address_primary,city,state,zip_code,latitude,longitude,technology_code,upload_speed_anticipated,download_speed_anticipated

3. BEAD Program Monitoring Plan

4. Draft Subgrantee Agreement

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5. EHP Compliance Plan

Title: Environmental & Historic Preservation (EHP) Compliance Plan
Sections:

1. EHP Requirements Overview
2. NEPA Methodology (using ESAPTT)
3. Joint Lead Agency Roles & Responsibilities
4. FirstNet Regional PEIS Evaluation
5. Extraordinary Circumstances Analysis
6. Specific Award Conditions for Ground-Disturbing Activities

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