Contents

I.   Authority

1.   What is the source of NTIA's authority under this program?

The primary goal of the Program, as mandated by section 6001(l) of the Recovery Act, is to develop and maintain a comprehensive, interactive, and searchable nationwide inventory map of existing broadband service capability and availability in the United States that depicts the geographic extent to which broadband service capability is deployed and available from a commercial or public provider throughout each state. Furthermore, Division A of the Recovery Act authorizes NTIA to expend up to $350 million pursuant to the Broadband Data Improvement Act (BDIA) and for the development and maintenance of the national broadband map. The BDIA directs the establishment of the State Broadband Data and Development Grant Program and the award of competitive grants to eligible entities for the development and implementation of statewide initiatives to identify and track the availability and adoption of broadband services within each State.

II.   Eligibility

1.   Do the entity eligibility requirements prevent for-profit companies from participating in mapping process?

No. While for-profit companies cannot be designated eligible entities for application for grants and direct receipt of grant awards, the requirements do not prohibit awardees from

contracting with for-profit companies. Therefore, a state agency, or nonprofit entity can receive grant funds and use the funding to engage a for-profit company to conduct parts of the proposed project.

2. **What responsibility does a state have for a grant proposal submitted by an entity other than an agency or instrumentality of the state?**

A state is entitled to designate any eligible entity it considers appropriate. NTIA believes, however, that in granting states the authority to designate eligible entities, the BDIA recognized the importance of the state role in the improvement of broadband data. NTIA also believes that, given the unique relationship between the states and broadband service providers, substantial state involvement and oversight will increase the likelihood of a project's success. Therefore, NTIA believes that states should continue to play an active role in any project funded by grants under this program. When evaluating grant proposals, NTIA will consider the degree to which a state agency or instrumentality is to be involved in the execution of both mapping and planning projects.

Also, given the inherently public policy focus of broadband planning, NTIA believes that state agencies or instrumentalities are the most appropriate entities through which the planning funds provided in the Notice of Funds Availability (NOFA) should flow. Such entities are best situated to manage interagency coordination, serve as impartial brokers of public-private partnership, and ensure public involvement and receptiveness to public needs.

Lastly, NTIA believes that state agencies and instrumentalities are the entities most suited to oversee the data verification function and are most capable of ensuring independence and impartiality in this process.

III.   General Program Information

1. **What is the Funding Opportunity Number for the Mapping Program?**

The Funding Opportunity Number for the Mapping Program is the Regulatory Identification Number associated with the *Notice of Funds Availability*: RIN 0660-ZA29.

2. **What is the CFDA Number and Title for the Mapping Program?**

The Catalog of Federal Domestic Assistance (CFDA) number for the Mapping Program is 11.558. The CFDA title for the Mapping Program is the "State Broadband Data and Development Grant Program."

IV. Data

A. Collection

1. Must designated entities obtain broadband-related data from broadband service providers?

The NOFA presumes that data will be obtained from broadband service providers, although there is no explicit direction that data must come from providers. If an applicant can convincingly present that it can otherwise provide broadband service data of the type, at the level of granularity and as otherwise required in the *Technical Appendix*, such a method may be used to collect the data. NTIA does expect, however, that if providers are offering data under the guidelines described in the NOFA, that applicants will use that data either as primary data to later verify or as data that can be used to verify data collected otherwise.

2. What is the expectation for the content of the semi-annual updates?

The semi-annual updates should include all new or updated information required under the *Technical Appendix*.

3. Should applicants include resellers in the data collection process?

No. The definition of provider does not extend to resellers.

4. Must a State collect data from broadband providers offering service to Indian tribes and to tribal lands?

Yes. States must demonstrate in their Applications how they will collect all of the data required under the *Technical Appendix*, including from broadband providers offering service to Indian tribes and on tribal lands. In addition to reviewing the description of the data collection methodology, NTIA will also review each applicant's existing relationships and planned collaborations with Indian tribes, among other constituencies.

5. Can NTIA provide more guidance on what constitutes community anchor institutions?

Community Anchor Institutions include: schools and libraries, community colleges and institutions of higher learning, medical and healthcare providers, public safety entities and other community support entities. NTIA will provide awardees either a specific list or specifications that a state may use to easily develop such a list for the following categories: schools and libraries, community colleges and institutions of higher learning, medical and healthcare providers and public safety entities. As referenced in the NOFA, each state should also develop its own list of additional community support entities.

6. **How should States describe the unserved/underserved areas in their applications?**

Applicants may provide this information in the format that best suits their needs. For example, an applicant may provide a basic map, a list of communities or a narrative description.

B. Verification

1. **How should data provided by a company on service availability be verified?**

All availability data, whether or not provided by a service provider, needs to be verified through a secondary source, such as a survey of a statistically representative sample of data, that ensures a high level of accuracy. NTIA considers that this may be best accomplished through the use of an independent validation. Please see footnote 27 in the NOFA which states, "[f]or example, a project should propose to collect availability data by address, as required the *Technical Appendix*, and should cross-check that data for accuracy by using at least one other metric (e.g., the location and capability of local infrastructure and whether such infrastructure could realistically serve a supposed service address, on-the-ground verification or telephone survey. Each method should be used to check a statistically significant sample of all addresses, and a statistically significant sample of rural addresses." 74 Fed. Reg. 32553, n. 27 (emphasis added).

2. **Who is responsible for verifying the collected data?**

States may choose any number of methods to achieve a high-level of accuracy and ensure that the project meets the transparency goals as set forth in the NOFA. If a state utilizes a contractor for the collection of data, an arm of the state equipped with statistical analysis tools could perform the verification, or the state could utilize an additional contractor who would perform the analysis. If a state intends to propose that the contractor who collects the data will also verify it, it must prove that the verification process is executed in a manner that minimizes the likelihood of a conflict of interest.

C. Deadlines

1. **What information are applicants expected to provide by November 1, 2009?**

NTIA's primary goal is the collection of a substantially complete data set by February 1, 2010, and as noted in NOFA "applicants will be reviewed based on the timeline on which they project delivery of the initial submission of a substantially complete set of broadband mapping data."

Section VII(A)(3) of the NOFA (i.e. "Expedient Data Delivery") states that NTIA has a preference for the provision of a substantially complete set of availability data by November 1, 2009. However, in no way should the provision of an alternate data set interfere with an

applicants' ability to collect a substantially complete or complete data set by February 1, 2010. Applicants should note that the NOFA also provides for the provision of an alternative data set by November 1, 2009. In the case that the provision of such a data set is not feasible by November 1, 2009, applicants should describe the barriers that prevent the collection of such data by that date.

2. **What is the difference between substantially complete mapping data (due by Feb. 1, 2010) and complete data collection (due by March 1, 2010)?**
    Applicants are expected to make efforts to obtain a more complete data collection by March 1st than the data collection presented on February 1st. The provision of a data set containing 100% of the data requested may be difficult, but NTIA expects applicants to attempt to obtain as close to a 100% data set as possible by March 1, 2010.

3. **How is the "substantial completion" determined?**
    The definition of a substantially complete data set has a four-part test, with each part intended to counterbalance the others. The definition requires the provision of data for the following: a) 70 percent of broadband service providers in a state; b) to 80 percent of households in a state; c) to 90 percent of households in rural areas of the state; and d) to 95 percent of public Community Anchor Institutions.

    For Example:

	Service Providers	Households	Rural Households	Community Anchors	Substantially Complete?
State A	71%	81%	91%	96%	Yes. This State has obtained sufficient responses in all categories.
State B	60%	70%	80%	90%	No. This State has obtained insufficient responses in all categories.
State C	80%	50%	20%	98%	No. This State obtained data from many service providers but with too little coverage.
State D	71%	90%	60%	96%	No. This state has obtained insufficient responses from providers to rural households.

V.   State Broadband Maps

1. Are applicants required to create state broadband maps?

The creation of a state broadband map is one of the eligible fund uses for grant funds under the State Broadband Data and Development Grant Program. However, though all applicants are required to collect broadband-related data pursuant to the requirements of this Program, they are not required to create state broadband maps.

2. Are there requirements on what the state broadband map must include? Is the state broadband map required to be an interactive map, or can it be static?

While the proposed contents of the state broadband map will be considered in evaluating applications, there are no requirements on what the state map must include and the state map may be static.

3. If an applicant chooses to develop a state broadband map, is it expected to complete such map by February 1, 2010, or is there a separate deadline to provide a link that will be used in conjunction with the national map?

NTIA's primary objective under this program is the development and maintenance of the National Broadband Map, therefore, while a substantially complete set of data is expected to be delivered to NTIA by February 1, 2010, if an applicant chooses to develop a state map, it is not required to complete it or provide a link to it by that date. However, if an applicant proposes to develop a state map, an aggressive timeline and expedient development is encouraged and will be considered favorably in evaluating applications.

VI.   Planning Awards

1. Are mapping and planning project proposals to be included in one application?

Yes. Mapping and planning are included in one application.

2. Are states required to submit a planning request?

States have the option of submitting a request for planning funding, but it is not required.

3. Are the funds available for planning awards included in the award range described in the NOFA?

Broadband planning-related uses under any grant application budget may not exceed $500,000.

Funding for data collection and mapping purposes are not expected to exceed $3.8 million per state. Thus, the maximum award that a state could expect through the State Broadband Data and Development Grant Program is $4,300,000.

4. **What are some planning activities contemplated for the planning grants?**
Any proposed planning project that meets an enumerated BDIA purpose in Section 1 (footnote six) of the NOFA is eligible for planning awards. These include: Identification of barriers to the adoption of broadband service and IT services, the creation and facilitation of local technology planning teams, and the establishment of computer ownership and Internet access programs.

Among other methods used to identify the barriers to the adoption of broadband and IT services, states may implement broadband planning activities, including but not limited to state broadband councils or taskforces and interagency collaboration groups within state and/or local government.

NTIA encourages states to consider what specific activities will best support broadband planning in their states based on the history, needs, population and other factors unique to each state's circumstance.

5. **Is the period of performance for the planning funding also for five years?**
States have the option to allocate the planning funds within a time frame that they see fit, not to exceed five years. However, states will be required to provide information about the use of the planning funds over the entire five years of the grant period.

VII.   Budgets

1. **Will NTIA consider applications below or above the expected grant amount range of $1.9 million to $3.8 million?**
NTIA will consider applications both below and above the expected grant range. Applicants should note that NTIA will only consider awards higher than the range in the most extreme and well-documented circumstances.

2. **Will NTIA consider granting states a waiver of the 20% match requirement?**
The 20% match is a statutory requirement and cannot be waived.

3. **Can previously obtained data be used as an in-kind match?**
An in-kind contribution of previously obtained data could be a part of an awardee's match if the data are appropriately dedicated to the funded project. An in-kind contribution of data is added to the project based upon the value of the data at the time it is dedicated to the project, NOT at the time it is obtained. Consequently, if the awardee dedicates previously obtained data to the project at the time of the award, the value will be determined as of the time of the award. Based on the particular circumstances, the value of the match should be estimated by calculating a use allowance, depreciation, or current fair market value.

4. **Will NTIA consider the costs of determining unserved and underserved areas prior to award as either a pre-award cost or a contribution to match?**

The application's description of areas that the applicant believes to be unserved or underserved is intended to allow state-level applicants the opportunity to provide a quick "snapshot" of areas in the state with inadequate broadband deployment. The cost of determining such unserved and underserved areas can constitute pre-award costs. However, applicants are not guaranteed to receive grant awards nor are applicants guaranteed reimbursement for all pre-award costs.

NTIA must approve all pre-award costs and, in the case of pre-award costs relating to the initial unserved/underserved determination NTIA will consider the following elements: 1) will the determination result in information that will prove useful in the ultimate mapping project; and 2) will the determination be done within reasonable time and cost constraints?

Pre-award costs cannot be approved prior to submitting the grant application.

5. **Will FCC Form 477 data be continuously updated and made available to the awardee during the full five year period of performance?**

The FCC has requested comments on providing eligible entities with access to Form 477 data under the BDIA, and is expected to address the associated issues once that process is complete.

6. **Can an awardee use grant funds to contract or award grants to third parties?**

Yes. Awardees may use grant funds to contract or award grants to third party for-profit and/or non-profit entities. For contracting guidance, please see 15 C.F.R. § 24.36 for state and local entities and 15 C.F.R. §§ 14.40-14.48 for 501(c)(3) organizations. For guidance on making sub-grants, please see 15 C.F.R. § 24.37.

7. **What are some guidelines for matching contributions?**

All matching contributions must be:

- Verifiable from recipient records;
- Not included as cost or match for other federally-funded program;
- Necessary and reasonable for accomplishing the program objectives;
- Allowable according to cost principles as promulgated by the OMB in 2 CFR Parts 225 and 230; and
- Conform to grant/contract limitations.

And all applicants using in-kind contributions, must be able to document the elements above, and such documentation must ensure that matching contributions are:

- Reasonable and allocable;
- Confirm to grant/contract limitation;

- Treated consistently;
- Determined in accordance with Generally Accepted Accounting Principles (GAAP); and
- Not included as cost or match for other federally-funded program.

8. **What are examples of things that may count as in-kind contributions?**

   Physical items and information:

   - Office supplies
   - Certain computer software
   - Relevant data

   Use of equipment or space:

   - Office and meeting space
   - Computers, phones, fax and copy machine use
   - Vehicle usage

   Employee professional time:

   - Training, project implementation, supervision
   - Provision of technical assistance on a project
   - Evaluation of the project
   - Oversight of project quality

9. **Can matching contributions come from sources other than the applicant?**

   Yes. Contributions can be provided by third-parties, and these contributions can be cash or in-kind.

10. **If a vendor offers an applicant a discount, can the applicant include that discount toward the 20% matching funds requirement?**

    No. The amount of the discount cannot be applied to the required 20% match. Instead, it represents a reduction in the overall cost of the project.

11. **Can an applicant include in its application a proposed cost associated with the collection of data from broadband service providers?**

    Yes. An applicant can include such costs in its proposed budget. In making a grant award, NTIA would assess whether such a cost would be a reasonable, allowable, and allocable cost under the grant. NTIA, however, would expect such costs to be deemed reasonable only under limited circumstances.

12. **Where can an applicant obtain further information about the requirements that apply to matching funds?**

    For further information regarding matching requirements as applied to State, local, and Indian tribal governments, please see 15 C.F.R. § 24.24 at http://edocket.access.gpo.gov/cfr_2008/janqtr/pdf/15cfr24.24.pdf . For further information regarding matching requirements as applied to other organizations, please see 15 C.F.R. § 14.23 at http://edocket.access.gpo.gov/cfr_2008/janqtr/pdf/15cfr14.23.pdf.

VIII.   Expert Reviewers

1. **Is it common for expert reviewers to participate in the review of grant applications? If so, why?**

    Yes, it is common for federal agencies to use independent expert reviewers as part of a grant review process. Independent analysis strengthens the process by incorporating the experience and up-to-date knowledge of experts across the nation. This practice is especially valuable when grant applications of a scientific or technical nature are reviewed, due to the specialized expertise needed to carefully evaluate them. In addition, subjecting each grant application to review by multiple independent experts makes the selection process more rigorous and helps ensure the quality of funded projects.

2. **Will the expert reviewers decide which State Broadband Data and Development Grant Program grant applications to fund?**

    No, expert reviewers serve during one early stage of the grant selection process and their scoring will be included in NTIA's evaluation when the Agency selects grant recipients.   As detailed in the NOFA, panels of independent expert reviewers will conduct an initial merit review of grant applications, which will be augmented by NTIA staff review.