



# CONNECT ILLINOIS

Initial Proposal Public Comment Summary

Broadband Equity, Access, and Deployment (BEAD)

January 2024



Illinois  
Department of Commerce  
& Economic Opportunity  
OFFICE OF BROADBAND  
JB Pritzker, Governor



UNIVERSITY OF ILLINOIS SYSTEM

## Initial Proposal Volume I and II Public Comment

The Illinois Office of Broadband (IOB) public comment period for both volumes of the Connect Illinois Initial Proposal commenced on September 29, 2023, and was held through October 31, 2023.

Outreach and engagement activities were conducted to encourage feedback during the public comment period:

- **Publication on the IOB’s website:** Both volumes of the Initial Proposal and the eligible CAI list have been posted publicly on the IOB’s website under its “Federal Broadband” section. A link to provide comments on both volumes of the Initial Proposal is prominently displayed on the page.
- **Outreach through “Introduction to the BEAD Map Challenge Process” webinars:** The IOB began a webinar series in October to introduce the BEAD challenge process to local governments, nonprofits, providers, Illinois residents, and other stakeholders. The webinars summarized how the state defines community anchor institutions and the state’s plan for the challenge process (contingent on NTIA’s approval). Participants were encouraged to view the latest draft of the initial proposal and to submit feedback during the public comment period. BEAD Map Challenges Process stakeholder engagement has continued through regular webinars, technical assistance, and related outreach and education.
- **Outreach through the Illinois Broadband Connections newsletter:** The IOB publicized the Initial Proposal public comment period in its bi-weekly newsletter. All subscribers to the newsletter received a notification with details on how to participate in the public comment period.
- **Email to partnering organizations using listserv:** The IOB reached out to partners and past program participants in the stakeholder engagement process to publicize the public comment period, to direct stakeholders to online materials, and to encourage public comment submission.

## Summary of public comments received on Initial Proposal Volume I

A total of **37 comments** from the public were received during the public comment period. A high-level summary of the comments received and the IOB’s response is provided below.

Summary of public comments	IOB response
<b>Community Anchor Institutions (Requirement 6)</b>	
Adding additional organizations as CAIs under categories defined in the IL IP Vol. 1 draft	All submitted organizations that fall under the defined categories in the IL IP Vol. 1 draft will be added to the CAI list as eligible CAIs.
Evaluating community needs prior to classifying a CAI as BEAD-eligible	The state assessed the availability of 1 Gigabit symmetrical service by cross-referencing relevant data sets, engaging relevant agencies, and conducting a geospatial proximity analysis. The state posted the full list of CAIs and the list of eligible CAIs during the public comment period to ensure that all relevant stakeholders have the opportunity to give feedback on the list. In alignment with BEAD requirements, identified CAIs that do not have access to 1 Gigabit symmetrical service are BEAD-eligible.
Including public housing, HUD-assisted housing, and low-income community housing under the category “public housing organization”	According to the BEAD NOFO's statutory definition of Community Anchor Institutions (CAIs) and the CAI definition proposed in the IL IP Vol. 2 draft, public housing and HUD-assisted housing organizations are classified as CAIs. Community-based non-profit organizations that support low-income individuals are included as CAIs under the category “Community Support Organizations.” It is important to note that public housing, HUD-assisted housing, and low-income community housing are classified as Broadband Serviceable Locations (BSLs,) in the FCC National Broadband Maps and the NTIA requirements and are not considered to be CAIs.
Including County Forest Reserve Districts as CAI	County Forest Reserve Districts will be included as CAIs under “Community Support Organizations.”
Including religious institutions/houses of worship in the list of community anchor institutions, subcategory “Community Support Organization”	<p>The state received two public comments requesting the inclusion of religious institutions/houses of worship in the list of community anchor institutions. The state recognizes the important role that religious institutions can play expanding broadband access for covered populations. During the challenge process, religious institutions that have worked directly with communities to expand broadband access for covered populations can provide evidence to the IOB and subsequently can be included in the list of eligible CAIs under the subcategory of "Community Support Organizations."</p> <p>With respect to the question on whether religious institutions as a whole should be included as a category of community anchor institutions, the broadband office consulted with NTIA and evaluated the options and has declined to do so. The state has concluded that churches, as part of their mission, do not conduct activities that facilitate greater use of broadband service by</p>

Summary of public comments	IOB response
	vulnerable populations. Thus, while these are important institutions for our communities, they do not qualify under the existing definition of community anchor institutions.
Removing public housing organizations as CAIs	The request does not align with BEAD NOFO's statutory definition of Community Anchor Institutions.
Restricting CAIs to only non-profits and government agencies	The request does not align with BEAD NOFO's statutory definition of Community Anchor Institutions.
<b>Challenge process and modifications (Requirement 7)</b>	
<i>Challenge process and modifications A) Pre-challenge modifications</i>	
Support for DSL modification	Consistent with current approach in IP Vol. 1 draft and no further adjustment needed.
Support for designation of certain MDUs in high-poverty or highly unconnected areas as “underserved”	Consistent with current approach in IP Vol. 1 draft and no further adjustment needed.
Considering locations, and/or MDUs, served with DSL as “unserved”	The state plans to adopt Optional Module 2 from the NTIA’s BEAD model challenge process, treating locations that the National Broadband Map shows to have available qualifying broadband service delivered via DSL (i.e., a location that is “served”) as “underserved.”
Considering locations served with licensed and cellular fixed wireless as either “underserved” or “unserved”	The BEAD NOFO’s definition of “Reliable Broadband Service” includes terrestrial fixed-wireless technology using entirely licensed spectrum or using a hybrid of licensed and unlicensed spectrum. The state is bound by the NOFO’s definition of reliable broadband. If a location or group of locations served by fixed-wireless service fails to meet the speed and latency requirements for "served locations," qualified participants may contest the service availability of such locations through the challenge process.
Declining all modifications except the DSL pre-challenge modification	The request does not align with the state’s goal of ensuring that the map is as accurate as possible prior to the BEAD subgrantee process. The state will review all challenges, rebuttal evidence, and supporting evidence received during the challenge process. Consistent with NTIA’s requirements and pending NTIA review and approval, sustained challenges will result in changes to the Illinois map.
Modifying the MDU pre-challenge modification to include locations that are validated as unserved by EducationSuperHighway’s desktop assessment process	The state intends to make the modification as suggested.

Summary of public comments	IOB response
<i>Challenge process and modifications B) Timeline of challenge process</i>	
Extending the challenge and rebuttal periods	The state’s challenge process timeline depends on NTIA’s approval of Initial Proposal, Volume 1.
Starting the challenge process in January 2024	The state plans to start the challenge process in January 2024. The exact timeline depends on NTIA’s approval of the IP, Volume 1.
<i>Challenge process and modifications C) Challenge process design</i>	
Limiting permissible challenges from non-profits to locations served by the non-profit	The request does not align with the model challenge process provided by NTIA.
Implementing the two-phase process described in NTIA’s final guidance for de-duplication	The state plans to implement the two-phase process described in NTIA’s final guidance on de-duplication.
Publishing the standard operating procedure for challenge process review	The state plans to adhere to the procedures outlined in NTIA’s model challenge process, which is the same as the process proposed in the IP Vol. 1 draft.
Adopting a “preponderance of evidence” approach in resolving challenges and assigning challengers the burden of proof	The state plans to adhere to the approach outlined in NTIA’s model challenge process, which is the same as the process proposed in the IP Vol. 1 draft.
Designating a single point of contact (POC) within the challenge portal and generating an email to the POC whenever a challenge is received	The state plans to designate a single point of contact in the state challenge portal and to automatically generate an email to the POC whenever a challenge is received.
Imposing evidentiary standards and requirements that will allow for accurate and expedient resolution of challenges	The state plans to adhere to the evidentiary standards and requirements outlined in NTIA’s model challenge process, which is the same as the process proposed in the IP Vol 1 draft.
<i>Challenge process and modifications D) Area/MDU challenges</i>	
Modifying the MDU Challenge Module such that <b>three unserved units</b> within an MDU or <b>10%</b> of the building’s units, whichever amount is <b>smaller</b> , trigger an area challenge	The state acknowledges and supports the objective of ensuring the map is as accurate as possible for MDUs. However, in response to NTIA curing feedback, the state will use the guidelines defined in the NTIA model challenge process.
<i>Challenge process and modifications E) Use of speed-testing data</i>	
Accepting speed test results only if conducted using industry-accepted platforms	The state will provide a list of accepted sources of speed tests, as recommended by NTIA, and consistent with the NTIA model challenge process.

Summary of public comments	IOB response
Accepting speed test results only if conducted using equipment recommended by the subscriber’s ISP	The request does not align with the model challenge process provided by NTIA.
Clarifying that speed tests will not be required for locations served by fiber in proving that these locations are served, and that speed tests should only target technologies reporting speed at or near 100/20 Mbps	The request does not align with the model challenge process provided by NTIA.
<i>Challenge process and modifications F) Planned services</i>	
Allowing for the identification of planned-build locations and/or adopting the final guidance’s evidentiary examples that allow planned service to be considered	The state is adopting the model challenge process provided by NTIA regarding planned service, which allows for the identification of planned-build locations.
Adjusting the planned-build completion date to within two years of the date when the state expects, at the time of the challenge, to award funding	The state is adopting the model challenge process provided by NTIA regarding planned service and associated timelines.
Permitting a provider to file a declaration detailing the steps it has taken to deploy service in the locations and/or the capital investments set aside for such deployments as evidence to substantiate a planned service challenge	The state is adopting the model challenge process provided by NTIA regarding planned service and associated evidentiary requirements.
<b>Additional comments not directly relevant for the Initial Proposal, Volume 1</b>	
Request for additional equipment	As shared in the Connect Illinois Five-Year Action Plan, the state anticipates that all BEAD funds will be needed for broadband deployment; therefore, it is unlikely that funds will remain for digital inclusion programming. The state has not yet published the state digital equity plan for public comment but recommends that the commenter review that plan and provide comment there.
Sharing commitment to further collaboration as planning proceeds	The state will continue to engage all stakeholders.
Allowing downloads of current BEAD-eligible locations on the IL map	Eligible entities can enter into a license agreement with CostQuest for the Location Fabric by following instructions at the <a href="#">BDC Help Center</a> .

Summary of public comments	IOB response
Allowing downloads of MDU locations for pre-challenge modification	The state will make the MDU locations for pre-challenge modification available in the challenge portal.
Articulating a preference for fiber buildout for unserved and underserved locations	The state is abiding by the requirements of the BEAD NOFO and guidance, which include the following definition of a priority broadband project: “NTIA has determined that ‘Priority Broadband Projects’ are those that use end-to-end fiber-optic architecture” (BEAD NOFO, page 42).
<b>Additional comments for NTIA and FCC</b>	
Holding ISPs accountable for accurately measuring and depicting the service provided in rural America	N/A since this is not a request to the state.

## Summary of public comments received on Initial Proposal Volume II

A total of **36 comments** from the public were received during the public comment period. A high-level summary of the comments received and the IOB’s response is provided below.

Category	Summary of public comments	IOB response
<b>Requirement 8 – Detailed description of deployment subgrantee selection</b>		
<i>Subgrantee process A) Fair, open, competitive process</i>		
Pre-qualification submission	<ol style="list-style-type: none"> <li>1. Open the pre-qualification window ahead of the grand rounds. (<i>Frontier</i>)</li> <li>2. Simplify all pre-application materials for providers. (<i>WISPA</i>)</li> </ol>	<ol style="list-style-type: none"> <li>1. The comment is consistent with the state plan.</li> <li>2. The comment is consistent with the state plan.</li> </ol>
Eligible participants	<ol style="list-style-type: none"> <li>1. Provide an explicit definition of “eligible entity.” (<i>Comed, West Monroe</i>)</li> <li>2. Provide an explicit definition of “subgrantee”; clarify whether the state’s definition is the same as BEAD NOFO’s definition. (<i>Comed, West Monroe</i>)</li> </ol>	<ol style="list-style-type: none"> <li>1. “Eligible entity” is defined as the state of Illinois.</li> <li>2. The state will use BEAD NOFO’s definition of “subgrantee.”</li> </ol>
Structure of the subgrant process	<ol style="list-style-type: none"> <li>1. Combine Wave 1 and Wave 2 application processes so that providers may reach both unserved and underserved locations in one project. (<i>USTelecom</i>)</li> </ol>	The current approach allows providers to reach both unserved and underserved locations in one project. Applicants will be qualified to participate in Wave 1 if their project area contains a sufficient number of hard-to-serve locations.
Application period	<ol style="list-style-type: none"> <li>1. Extend the application period to at least 20 business days. (<i>Mercury Broadband</i>)</li> <li>2. Submit a waiver to NTIA for a one-year timeline to complete application rounds and reviews so that providers have more time to review project areas. (<i>Brightspeed</i>)</li> </ol>	<ol style="list-style-type: none"> <li>1. Pending NTIA approval, the application period will last two to four weeks.</li> <li>2. The state plans to abide by the requirements of BEAD NOFO and to complete the subgrant process within one year.</li> </ol>
Awards	<ol style="list-style-type: none"> <li>1. Deem all awards as fixed amount subawards. (<i>USTelecom</i>)</li> </ol>	Fixed-amount subawards currently are not allowed within the BEAD framework. Should that change, The state will consider incorporating them.



*Subgrantee process B) Prioritization*

Technology preference	<ol style="list-style-type: none"> <li>1. Indicate whether fiber build-out is preferred for underserved/unserved locations. (<i>Frontier</i>)</li> <li>2. Do not adopt a “fiber-only” policy for broadband projects. (<i>WISPA</i>)</li> </ol>	<ol style="list-style-type: none"> <li>1. The state is abiding by the requirements of the BEAD NOFO and guidance, which define priority broadband projects as follows: “NTIA has determined that ‘Priority Broadband Projects’ are those that use end-to-end fiber-optic architecture” (BEAD NOFO, page 42).</li> <li>2. Same as above.</li> </ol>
Middle-mile projects	<ol style="list-style-type: none"> <li>1. Detail specific guidelines or provisions related to middle-mile infrastructure. (<i>Comed</i>)</li> </ol>	<p>The State of Illinois is adopting the definition and guidelines outlined in the BEAD NOFO. According to the NOFO, middle-mile infrastructure (A) means any broadband infrastructure that does not connect directly to an end-user location, including a community anchor institution; and (B) includes: (i) leased dark fiber, interoffice transport, backhaul, carrier-neutral internet exchange facilities, carrier-neutral submarine cable landing stations, undersea cables, transport connectivity to data centers, special access transport, and other similar services; and (ii) wired or private wireless broadband infrastructure, including microwave capacity, radio tower access, and other services or infrastructure for a private wireless broadband network, such as towers, fiber, and microwave links. An “Unserved Service Project” or “Underserved Service Project” may include Middle Mile Infrastructure in or through any area required to reach interconnection points or otherwise to ensure the technical feasibility and financial sustainability of a project providing service to an unserved location, underserved location, or eligible CAI.</p>
Last-mile projects	<ol style="list-style-type: none"> <li>1. Clarify the state’s definition of “last-mile projects” in light of the detailed definition used by BEAD NOFO. (<i>Comed</i>)</li> </ol>	<p>The State of Illinois is adopting the definition outlined in the BEAD NOFO. According to the NOFO, last-mile broadband deployment projects include:</p> <ol style="list-style-type: none"> <li>1. Construction, improvement, and/or acquisition of facilities and telecommunications equipment required to provide qualifying broadband service, including infrastructure for backhaul, middle- and last-mile networks, and multi-tenant buildings.</li> <li>2. Long-term leases (for terms greater than one year) of facilities required to provide qualifying broadband service, including indefeasible right-of-use (IRU) agreements.</li> <li>3. Deployment of internet and Wi-Fi infrastructure within an eligible multi-family residential building.</li> </ol>

4. Engineering design, permitting, and work related to environmental, historical, and cultural reviews.
5. Personnel costs, including salaries and fringe benefits for staff and consultants providing services directly connected to the implementation of the BEAD Program (such as project managers, program directors, and subject matter experts).
6. Network software upgrades, including, but not limited to, cybersecurity solutions.
7. Training for cybersecurity professionals who will be working on BEAD-funded networks.
8. Workforce development, including Registered Apprenticeships and pre-apprenticeships, and community college and/or vocational training for broadband-related occupations to support deployment, maintenance, and upgrades.

CAI funding eligibility	<ol style="list-style-type: none"> <li>1. Prioritize 1 Gbps service to all Illinois public libraries. (RAILS, Illinois State University, PrairieCat, The Ames Library, Resident in Chicago, River Forest Public Library)</li> </ol>	<ol style="list-style-type: none"> <li>1. Prioritizing unserved and undeserved locations before CAIs is a BEAD requirement per NTIA.</li> </ol>
Back-up signal source	<ol style="list-style-type: none"> <li>1. Address the need for a robust and resilient back-up timing signal source. (Critical Infrastructure Resilience Institute at the University of Illinois)</li> <li>2. Use BEAD grant funding to expand the access of Nationwide Integration of Timing Resiliency for Operation. (<i>NITRO</i>)</li> </ol>	The state maintains that using deployment funds for back-up timing is not an eligible use of BEAD funds.
Planned services	<ol style="list-style-type: none"> <li>1. Prioritize awards to ISPs that submit a minimal bid for areas they are building or plan to build (if the state decides not to allow for planned builds still under construction). (<i>Brightspeed</i>)</li> </ol>	The state has not yet determined whether this approach is feasible within Illinois rule-making.

*Subgrantee process C) Scoring*

Minimal BEAD outlay scoring	<ol style="list-style-type: none"> <li>1. Clarify the calculation of reference cost. (<i>Brightspeed, IBCA</i>)</li> </ol>	<ol style="list-style-type: none"> <li>1. The reference cost of each project area unit (PAU) will be published when the state releases the</li> </ol>
-----------------------------	--	---

2. Reduce weighting of both minimal BEAD categories to 20%. (*Laborers' International Union*)
3. Increase weighting of minimal BEAD category to 35%. (*WISPA*)

PAUs prior to the grant process. Example of the minimal BEAD outlay scoring:

- Provider X applies for Area Y, with a reference cost of \$5 million. Provider X asks for \$7 million in BEAD outlay and reports a total cost of \$14 million.
- The provider's match rate is \$7 million/\$14 million = 50%. The provider will receive 14 points for "Minimal BEAD Outlay: non-state match."
- The provider's BEAD outlay is 140% of the reference cost; hence the provider will receive 9 points for "Minimal BEAD Outlay: financial need with respect to reference cost."

2. The state has reviewed the comment and decided not to adopt the suggestion.
3. The state has reviewed the comment and decided not to adopt the suggestion.

---

Affordability scoring

1. Revise affordability scoring to be consistent with NTIA guidance; remove lock-in price scoring. (*Brightspeed, AT&T, USTelecom*)
2. Revise speed tiers to be more inclusive of fixed-wireless access (FWA) or alternative technologies. (*Uscellular*)
3. Clarify inclusion of consumer contract and penalties when breached. (*Frontier, Mercury Broadband*)
4. Score applicant prices against the FCC's urban broadband and national affordability benchmarks. (*USTelecom, AT&T, Frontier, CTIA*)
5. Rely on Affordable Connectivity Program (ACP) participation or a compatibility test to meet BEAD's affordability requirements. (*USTelecom*)
6. Revise scoring so as not to be on a sliding scale. (*USTelecom*)
7. Revisit the weight assigned to affordability and/or reduce

1. The state will revise scoring to include only 100/20 Mbps and 1/1Gbps to be consistent with NTIA guidelines.
2. Inclusion of 100/20 Mbps and 1/1Gbps speed tiers is based on NTIA requirements.
3. The state plans to follow the NTIA/BEAD guidance, which appears to prohibit additional penalties.
4. The reference price is determined based on broadband pricing in Illinois, which the state believes to be a better reference than a nationwide benchmark. Kindly review the Connect Illinois Five-Year Action Plan for more details on analysis of pricing and affordability.
5. The state does not feel that this suggestion is in line with BEAD's stated goals.
6. The state does not feel that this suggestion is in line with BEAD's stated goals.
7. The state has reviewed the comment and decided not to adopt the suggestion.
8. Per BEAD NOFO, NTIA requires the inclusion of 100/20 Mbps in the state's affordability scoring criteria.
9. The state's proposed approach is consistent with past approaches taken in Connect Illinois grant

	<p>affordability scoring criteria to 10%. (<i>Frontier, WISPA</i>)</p> <p>8. Focus on 100/20 Mbps symmetrical speed requirements instead of 100/100. (<i>WISPA</i>)</p> <p>9. Include some price flexibility for providers. (<i>USTelecom, AT&amp;T</i>)</p> <p>10. Prioritize proposals that improve affordability. (<i>EducationSuperHighway</i>)</p>	<p>rounds. Accordingly, the state plans to mandate pricing stability for at least three years.</p> <p>10. The comment is consistent with the state’s plan.</p>
Fair Labor Practices scoring	<p>1. Increase the weighting of Fair Labor Practices criteria to 15%. (International Brotherhood of Electrical Workers, Laborer’s International Union)</p> <p>2. Award additional points to applicants that will sub-contract installation work or commit to hiring additional full-time employees. (Laborers’ International Union)</p>	<p>1. The state has increased the weighting of Fair Labor Practices to 15%.</p> <p>2. The state believes that the stated labor standards and protections are sufficiently strong.</p>
Speed-to-deployment scoring	<p>1. Increase the weight of speed-to-deployment scoring criteria and provide additional detail. (<i>IBCA, WISPA, Brightspeed</i>)</p> <p>2. Expand the “speed of network and technical capabilities” criteria to extend beyond speed (to include technical support and optimized spectrum design) and award additional points to applicants with superior network management practices. (<i>EducationSuperHighway</i>)</p>	<p>1. The current scoring rubric and the relative weighting reflects Illinois’s priorities for broadband deployment.</p> <p>2. Same as above.</p>
Open Access scoring	<p>1. Remove or decrease the weight of Open Access scoring criteria. (<i>USTelecom, Brightspeed, CITA, IBCA, AT&amp;T, WISPA</i>)</p> <p>2. Prioritize last-mile broadband projects that comply with Open Access. (<i>INCOMPAS</i>)</p> <p>3. Clarify what is meant by “provision of open access and</p>	<p>1. The state has reduced the weight assigned to Open Access scoring to balance the overall scoring required for the minimal BEAD outlay, thereby mitigating cost pressures on the state as it pushes toward universal coverage.</p> <p>2. See above.</p> <p>3. In accordance with the BEAD NOFO, the term “open access” refers to an arrangement in which the subgrantee offers nondiscriminatory access to and use of its network on a wholesale basis to</p>

use of existing network."  
(Mercury Broadband)

other providers seeking to provide broadband service to end-user locations at just and reasonable wholesale rates for the useful life of the subsidized network assets. Specifically for Connect Illinois Round 4 scoring, "provision of open access" is defined as "policies that enable third-party ISPs to purchase wholesale services and serve retail customers," and "use of existing network" is defined as the "degree to which [a] project leverages existing network and non-network resources." Both criteria will be evaluated similarly to their evaluation in Connect Illinois, Round 3.

Local coordination scoring	<ol style="list-style-type: none"> <li>1. Reduce the points assigned to all local coordination criteria. (IBCA)</li> <li>2. Clarify what is meant by "points based on degree of breadth and depth of community support for project." (Mercury Broadband, IBCA)</li> <li>3. Remove "points based on financial investment by community members and organizations" from the scoring criteria. (Mercury Broadband, Brightspeed)</li> <li>4. Revise criteria to allow other local planning efforts to qualify. (IL Farm Bureau, IL Soybean Association)</li> <li>5. Remove criteria related to participation in Accelerate Illinois entirely. (WISPA)</li> </ol>	<ol style="list-style-type: none"> <li>1. The state believes that feedback from local stakeholders is critical and will retain the local coordination criteria in the rubric.</li> <li>2. The state's evaluation of the degree of community support will be similar to its evaluation in Connect Illinois, Round 3. Factors for consideration include (a) the degree of financial contribution from community-based members and institutions, (b) in-kind resource commitments from community-based members and institutions, and (c) evidence supporting verification of the pledge.</li> <li>3. See response to (1) above.</li> <li>4. The state's evaluation of community support will be similar to its evaluation in Connect Illinois, Rd 3</li> <li>5. The state intends to remove criteria related to participation in Accelerate Illinois and will assign 5% each to "evidence of community support" and "verified financial commitment from community" to maintain consistency with Connect Illinois, Rd 3</li> </ol>
Overall scoring	<ol style="list-style-type: none"> <li>1. Award additional points to providers that commit to offer free service during the BEAD performance period. (EducationSuperhighway)</li> <li>2. Revise overall scoring criteria to include climate-related concerns and to better enable small to medium ISPs to compete on matching funds, financial needs, pricing, and speed-to-</li> </ol>	<p>The current scoring rubric and the relative weighting reflects Illinois's priorities for broadband deployment.</p>

deployment criteria. (*Mercury Broadband, WISPA*)

*Subgrantee process D) Project area and de-conflicting*

Definition of PAU	<ol style="list-style-type: none"> <li>1. Allow applicants to submit projects that align with their infrastructure and geographic capabilities on a per-location basis. (<i>Frontier, IBCA</i>)</li> <li>2. Revise PAU grouping to provide more opportunities to fund deployment and non-deployment activities that enable alternative, non-fiber technology options (e.g., FWA). (<i>Uscellular, WISPA</i>)</li> <li>3. Use the census to track/define PAUs. (<i>Mercury Broadband</i>)</li> <li>4. Amend the definition of project areas to state that at least 80% of locations in the project area must be unserved or underserved. (<i>AT&amp;T</i>)</li> <li>5. Provide detail on identification of PAUs and “Extremely High-Cost Locations.” (<i>AT&amp;T, Brightspeed</i>)</li> <li>6. Clarify whether or not the state will share the CostQuest Associates (CQA) per-location net present value (NPV) and total investment data with the provider. (<i>Mercury Broadband</i>)</li> </ol>	<ol style="list-style-type: none"> <li>1. The state plans to use project area units, as described in the draft Initial Proposal, so that project proposals may be compared equally.</li> <li>2. Same as above.</li> <li>3. The state plans to use a geographical unit of the same approximate scale of a census tract.</li> <li>4. PAUs are collections of broadband-serviceable locations (BSLs), and project applications must include groups of PAUs.</li> <li>5. Additional information on PAUs will be provided before the initial grant round begins. The Extremely High-Cost Per-Location Threshold (EHCPLT) will be set in the second wave. Details on the process involved in setting the EHCPLT can be found in Section 2.4 of the draft Initial Proposal.</li> <li>6. The reference cost per PAU will be published. These reference costs will leverage CQA data. The underlying CQA data is proprietary.</li> </ol>
Hard-to-serve PAUs	<ol style="list-style-type: none"> <li>1. Classify “hard-to-serve PAUs” as falling above the extremely high-cost threshold. (<i>WISPA</i>)</li> <li>2. Clarify the definition of hard-to-serve areas. (<i>Illinois Electric Cooperative</i>)</li> <li>3. Classify areas that require migration from subpar technologies as hard-to-serve. (<i>Illinois Electric Cooperative</i>)</li> </ol>	<p>Subject to NTIA approval, “hard-to-serve PAUs” will be classified according to the definition provided in the draft initial proposal.</p>

Treatment of MDUs	<ol style="list-style-type: none"> <li>1. Require subgrantee proposals for PAUs that include multi-dwelling units (MDUs) to demonstrate how they will connect all units within an MDU. (<i>EducationSuperHighway</i>)</li> </ol>	The state will require subgrantees bidding on PAUs that contain MDUs to demonstrate how their proposed solutions will connect all units within an MDU.
De-conflicting process	<ol style="list-style-type: none"> <li>1. Handle overlap from a wireless project differently from a wired project in the de-confliction process. (<i>Uscellular</i>)</li> <li>2. Do not require applicants to identify “must-serve” PAUs upfront. (<i>WISPA, ICBA</i>)</li> </ol>	Subject to NTIA approval, the process to handle overlap is described in the draft Initial Proposal. Wired and wireless providers will be treated consistently.
Reference price	<ol style="list-style-type: none"> <li>1. Publish reference price at a PAU level. (<i>Mercury Broadband</i>)</li> </ol>	The comment is consistent with the state plan.
<i>Subgrantee process E) Process and plan for EHCPLT</i>		
Setting the EHCPLT	<ol style="list-style-type: none"> <li>1. Set the EHCPLT prior to Wave 1. (<i>Uscellular, CTIA</i>)</li> <li>2. Use historical data to establish a reasonable EHCPLT before the subgrantee selection process. (<i>Frontier, WISPA</i>)</li> </ol>	Subject to NTIA approval, the EHCPLT will be set after receipt of the applications in Wave 2 and will leverage the data on project cost from Wave 1 and 2.
<i>Qualifications A) EHP and BABA</i>		
EHP and BABA requirements	<ol style="list-style-type: none"> <li>1. Establish a qualified vendor list or require manufacturer certification to meet NTIA’s Build America, Buy America requirements. (<i>Nokia</i>)</li> <li>2. Support NTIA’s non-availability waiver for specific products. (<i>WISPA, Brightspeed</i>)</li> </ol>	The state plans to use NTIA’s guidance for Environmental and Historic Preservation (EHP) and Build America, Buy America (BABA) requirements, as described in the draft Initial Proposal.
<i>Qualifications B) Financial capabilities</i>		
Letter of credit requirement	<ol style="list-style-type: none"> <li>1. Revise the structure of the letter of credit requirement to demand less capital, modify with NTIA, or request a waiver. (<i>Frontier, Brightspeed, USTelecom, IBCA</i>)</li> <li>2. Request a waiver from NTIA to allow the state to apply the two-step “financial health”</li> </ol>	The state plans to utilize the NTIA guidance and the NTIA conditional programmatic waiver for the letter of credit requirement.

evaluation included in the comment. *(AT&T)*

3. Provide alternative means for applicants' demonstrated records of credit-worthiness. *(IBCA)*

Matching funds requirement	<ol style="list-style-type: none"> <li>1. Request a waiver of the 25% matching funds requirement. <i>(WISPA)</i></li> <li>2. Clarify how "high-cost areas" will be treated in potential waivers of matching-funds requirements. <i>(Brightspeed, CTIA)</i></li> </ol>	<ol style="list-style-type: none"> <li>1. The 25% matching funds request is only programmatically waived in the areas designated high-cost by NTIA. Should the need arise, waivers may be requested in the final grant round.</li> <li>2. Should the need arise, waivers may be requested in the final grant round.</li> </ol>
----------------------------	---	--

*Qualifications C) Technical capabilities*

Engineer certification	<ol style="list-style-type: none"> <li>1. Eliminate requirement for certification by a professional engineer or allow providers to use alternative authorities for certification. <i>(IBCA, WISPA, Brightspeed)</i></li> </ol>	The state plans to use the NTIA guidance on requirements for certification by a professional engineer.
------------------------	--	--

Evidence of other broadband projects	<ol style="list-style-type: none"> <li>1. Limit requirement to include only information that is essential to evaluate an ISP's technical capabilities. <i>(Brightspeed)</i></li> </ol>	The state plans to use the NTIA guidance on the information required to demonstrate technical capabilities.
--------------------------------------	--	---

**Requirement 9 – Fair and open selection of non-deployment subgrantees**

Non-deployment activities	<ol style="list-style-type: none"> <li>1. Incorporate non-deployment activities that address affordability and access within affordable housing communities. <i>(POAH, WISPA)</i></li> <li>2. Define "non-deployment activities." <i>(Comed)</i></li> </ol>	<p>The state does not anticipate having remaining funds for non-deployment activities.</p> <p>The state plans to follow the NTIA definition of non-deployment activities; however, the state does not anticipate having remaining funds for such activities.</p>
---------------------------	---	--



## Requirement 11 - Integrating labor standards and projections into requirements of prospective subgrantees

Labor standards mandate	<ol style="list-style-type: none"><li>1. Mandate labor standards related to workforce, union neutrality commitments, labor peace agreements, and prevention of worker misclassification. <i>(International Brotherhood of Electrical Workers)</i></li><li>2. Favor grantees/subgrantees that will employ unionized residents of Illinois. <i>(International Brotherhood of Electrical Workers)</i></li><li>3. Reduce requirement that 90% of the workforce comprise Illinois residents. <i>(USTelecom)</i></li><li>4. Explicitly name Executive Order #11246 – which requires that projects receiving federal assistance strive for equal-opportunity employment – and describe the mechanisms that the Illinois Department of Commerce and Economic Opportunity (DCEO) will use to track compliance. <i>(Chicago Women in Trades)</i></li><li>5. To strengthen accountability, make subgrantees’ Project Labor Agreements (PLAs) public and set agreed-upon goals for the participation of women and minority workers. <i>(Chicago Women in Trades)</i></li><li>6. Require explicit acknowledgement by subgrantee that all construction workers will be paid in compliance with Illinois’s Prevailing Wage Act. <i>(Laborers’ International Union, AT&amp;T)</i></li><li>7. Require PLAs for projects with costs of \$3 million or more. <i>(Laborers’ International Union)</i></li><li>8. Give a full score to subgrantees with a record of past compliance with federal labor laws and employment laws if non-compliance is not evident. <i>(Laborers’ International Union)</i></li></ol>	Illinois is committed to being a strong labor state. Its approach to labor standards and protection, as well as the revisions incorporated based on public comments, reflects that commitment. The weight of fair labor practices in the scoring rubric has been raised to 15%.
-------------------------	--	---

**Requirement 12 – Ensuring an available, diverse, and highly skilled workforce**

Workforce readiness	<ol style="list-style-type: none"> <li>1. Do not isolate the work of BEAD to the Business Engagement Committee of the International Brotherhood of Electrical Workers (IBEW); instead, use the Illinois Workforce Innovation Board (IWIB)'s full scope of work. (<i>Chicago Women in Trades</i>)</li> <li>2. Use BEAD funding for training/workforce development. (<i>Chicago Women in Trades, Comed</i>)</li> <li>3. Expand opportunities for apprenticeships in job training programs. (<i>WISPA</i>)</li> <li>4. Clarify whether subgrantees may consult with the state to include additional programs beyond those listed. (<i>Comed</i>)</li> </ol>	<ol style="list-style-type: none"> <li>1. The state will use the full scope of IWIB's work.</li> <li>2. State does not anticipate having remaining funds for non-deployment activities.</li> <li>3. The state is committed to supporting the development and use of a highly skilled workforce. As outlined in the draft Initial Proposal, The state will collaborate with the DCEO to further invest in apprenticeship programs.</li> <li>4. Subgrantees may consult with the state to discuss inclusion of additional programs.</li> </ol>
---------------------	--	--

**Requirement 13 – Recruiting, using, and retaining minority businesses, women-owned business enterprises (WBEs), and labor surplus area firms**

Rules on minority business and women-owned enterprises	<ol style="list-style-type: none"> <li>1. Request a waiver of requirements. (<i>WISPA</i>)</li> </ol>	<p>Illinois is committed to minority and women-owned businesses and does not plan to request a waiver.</p>
--	---	--

**Requirement 14 – Identifying steps to reduce costs and barriers to deployment**

Cost and barrier reduction	<ol style="list-style-type: none"> <li>1. Detail plan to incentivize providers' use of current assets such as utility poles. (<i>Comed</i>)</li> <li>2. Take additional steps to streamline regulatory barriers to deployment. (<i>IBCA</i>)</li> </ol>	<ol style="list-style-type: none"> <li>1. A provider will be scored on "provision of open access and use of existing network" similarly to prior Connect Illinois rounds.</li> <li>2. The state will support local communities with best practices in being broadband-ready communities.</li> </ol>
----------------------------	---	---

**Requirement 16 – Low-cost service options, middle-class affordability plan, and certification of subgrantees’ participation in the Affordable Connectivity Program or any successor program**

Option details	<ol style="list-style-type: none"> <li>1. Clarify the details of the low-cost service option. (<i>Brightspeed</i>)</li> <li>2. Restrict the program to focus solely on ACP participation and remove the requirement for \$30 plans. (<i>CTIA</i>)</li> <li>3. Decline to adopt any affordability proposals that violate the Infrastructure Investment &amp; Jobs Act (IIJA)’s prohibition on rate regulation; leverage ISPs’ existing low-income programs. (<i>ICBA</i>)</li> </ol>	<ol style="list-style-type: none"> <li>1. The state plans to adopt a low-cost service option as recommended by NTIA. See BEAD NOFO for further clarification.</li> <li>2. The state plans to adopt a low-cost service option as recommended by NTIA. See BEAD NOFO for further clarification.</li> <li>3. The state plans to adopt a low-cost service option as recommended by NTIA. The state’s affordability scoring does not attempt to regulate rates.</li> </ol>
----------------	---	---

**Requirement 19 – Certification of Illinois’s intent to comply with the requirements of the BEAD program and description of subgrantee accountability procedures**

Requirements	<ol style="list-style-type: none"> <li>1. Standardize the approach to ensuring that the BEAD’s cybersecurity and supply-chain risk management (SCRM) requirements are met (<i>Telecommunication Industry Association</i>). Ensure that a subgrantee’s SCS 9001 certification – a standard focused on the information and communications technology (ICT) supply chain created by the Telecommunications Industry Association (TIA) – will satisfy the security requirements of the BEAD NOFO. (<i>Telecommunication Industry Association</i>)</li> <li>2. Remove semi-annual reporting requirements. (<i>USTelecom</i>)</li> <li>3. Require applicants to provide ownership information that is consistent with NOFO requirements. (<i>IBCA</i>)</li> <li>4. Provide reasonable notice of monitoring requirements. (<i>ICBA</i>)</li> </ol>	<ol style="list-style-type: none"> <li>1. Illinois plans to use the NTIA requirements for cybersecurity and SCRM, which rely on NIST standards.</li> <li>2. The state intends to adopt requirements that are consistent with the BEAD NOFO, which include semi-annual reporting.</li> <li>3. The state intends to adopt requirements that are consistent with the BEAD NOFO.</li> <li>4. Per the BEAD NOFO, applicants will be required to provide ownership information.</li> <li>5. Monitoring will occur subsequent to selection and will verify the provider’s reported milestones.</li> </ol>
--------------	---	--

**Requirement 20 – Middle-class affordability plan**

All affordability-related comments discussed under scoring address affordability.