

INITIAL PROPOSAL Vol. 2 DRAFT

INTERNET FOR ALL

GUAM

Office of Infrastructure Policy and Development
November 2023



U.S. Department of Commerce

National Telecommunications and Information Administration

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Internet For All

2.1 Objectives (Requirement 1)

2.1.1 Vision

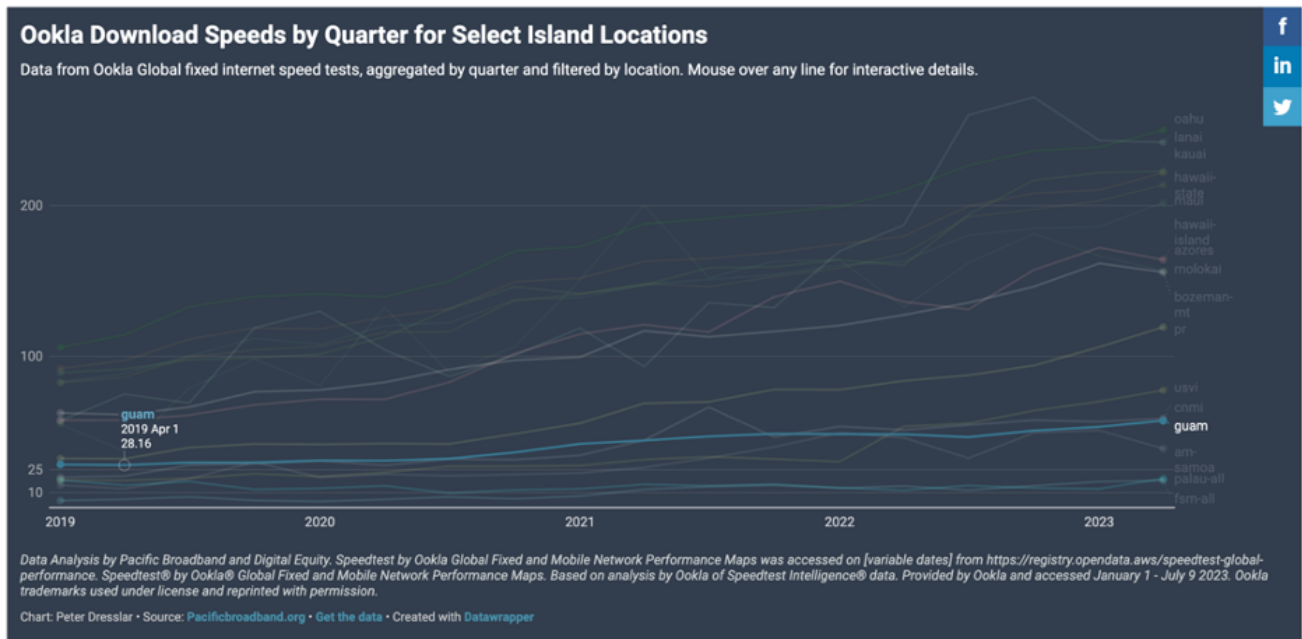
Powered by the Bipartisan Infrastructure Law (BIL) and the momentum of National Telecommunications and Information Administration's (NTIA) Broadband, Equity, Access and Deployment (BEAD) and Digital Equity programs, we're setting a clear mission for Guam. We aim to ensure every islander enjoys accessible, affordable, and reliable high-speed internet, strengthening our ties to the broader digital world while reinforcing our role in America's defense. As we navigate this journey, we're committed to narrowing a digital divide that currently feels as expansive as the Pacific itself.

For Guamanians, the '**digital divide**' isn't a distant concept; it's a tangible disadvantage resulting from our remote location, the high cost of internet access, and the missed opportunities these factors create. This divide poses a significant obstacle to equal opportunities across various aspects of life, spanning education, healthcare, and employment. It particularly impacts K-12 students who lack access to crucial developmental tools available to their peers in better-connected areas. In today's world, where remote work and digital literacy are not just possibilities but essential components of daily life, the unavailability of immediate and affordable high-speed internet places our entire community at a competitive disadvantage. Below are ways in which this office is working to close the Latency Gap by ensuring Guam has a connected network of Data Centers that will serve as a world-class IXP:

1. Invest only in broadband infrastructure solutions that contribute to internet resilience, sustainability, and—where possible—upgradability.
2. Ensure long-term, affordable gigabit access for all community anchor institutions that serve Guam's people and culture.
3. Promote infrastructure investments and internet policies that ensure a continuously healthy and well-regulated marketplace for participating network service providers.
4. Invest in digital equity activities that improve digital literacy and accessibility, high-tech economic opportunities, digital health, digital citizenship, and digital preservation and dissemination of indigenous culture for all Guamanians.
5. Develop strategies to bridge the digital divide that denies citizens full access to services, information, and opportunities due to economic disparities in the community.
6. Promptly investigate, analyze, and report to Guam's people regarding the technical, economic, and social factors that affect their internet access, affordability, and safety.



The primary obstacle to internet access in Guam is affordability. Internet pricing on the island is significantly higher than what is typical in American households, affecting both basic and premium service levels. In terms of performance, Guam suffers from subpar average upload and download speeds when benchmarked against national standards¹, coupled with extensive areas receiving inadequate service. Additionally, Guam still experiences high latency, which disrupts the routine use of contemporary, real-time applications. Such technological shortcomings threaten to impede Guam's advancement as these applications become more integral to global economic systems and the daily lives of Guamanians².



The BEAD program defines a population as ‘Served’ with affordable internet access greater than 100 Mbps download, 20 Mbps upload, and below 100 ms latency. Today, this basic level of service is out of reach for most Guamanians – this is no longer acceptable and must be addressed.

We plan to enhance our internet infrastructure by leveraging local initiatives, forging public-private collaborations, and seeking further opportunities with the National Telecommunications and Information Administration (NTIA) and other federal agencies. Our goal is to work in tandem with the Department of Defense, ensuring that our strategies align with Guam's distinctive security environment. As the United States' most remote territory, Guam serves as a critical strategic military base, playing a pivotal role in America's national security posture within the Indo-Pacific region.

¹ <https://www.speedtest.net/global-index/united-states#fixed>

² <https://www.gigaspaces.com/blog/amazon-found-every-100ms-of-latency-cost-them-1-in-sales>



Immediately after Typhoon Mawar moved past Guam, the island found itself with an almost total collapse of carrier service, this must not happen again. The Leon Guerrero-Tenorio Administration envisions a Guam where affordable qualifying internet service is soon available for all residents. A Guam with anchor institutions that can afford to serve their communities with gigabit internet and the programming made possible through that internet capacity. A Guam that leads the Pacific in digital equity and opportunities for its people and digitization to help its native language and culture last for many generations. A Guam with low-latency internet and communications service that can withstand whatever natural disasters the physical climate may unleash; or threats caused by the global political environment.

By realizing this vision, Guam will be safer, more secure, and more successful as we move towards unparalleled technological advancements in broadband. It is worth noting within the context of our federal partners that the well-being of Guam is one of the most cost-effective measures in which the United States can enhance its security position in the world.

Governor Lourdes A. Leon Guerrero, described it succinctly, “Infrastructure is Defense.” Indeed, in the aftermath of Guam’s recent Typhoon Mawar disaster, the criticality of all Guam infrastructure—including its broadband infrastructure—has never been more clear. As America rapidly shifts its national defense priorities to deliver an unprecedented military build-up on the island, Guam’s government has had to reassess and reorder its own infrastructure priorities – both to mesh with the defense build-up itself, as well as to plan for new modes of resilience for the local population. The island's experience following Typhoon Mawar means new evaluations and priorities will be necessary.

In the heart of the Pacific, Guam grapples with challenges that no other U.S. state faces. By leveraging funds from the Bipartisan Infrastructure Act, including the NTIA’s BEAD and Digital Equity programs, we are determined to establish a pioneering digital infrastructure that addresses these unique challenges and meets the evolving needs of our community. Recognizing our singular position and the necessity to innovate makes our ambition clear: to ensure affordable, resilient, and state-of-the-art internet access for all, now and in the future. By confronting and addressing these unparalleled challenges head-on, we are setting the stage for Guam to emerge as a beacon in this region, a leader and mentor of digital innovation and resilience, charting a course others may follow.

The ambition of this plan matches the aspirations we hold for the people of Guam. While the strategies we've outlined might evolve, our unwavering belief remains that we can and will achieve our goals.



2.2 Broadband Planning Process (Requirement 2)

We are fully committed to enhancing internet services in Guam. Our strategy is more than a plan; it's a pledge driven by the belief in the transformative power of connectivity. Balancing all islanders' input with data-driven evidence, we approach our mission with unwavering resolve. In the face of challenges, our focus on accessibility, affordability, and quality remains steadfast, without preference. We will not waver in our pursuit of a connected and empowered Guam.

Evidence-Based Decision Making: In the spirit of continuous improvement and data-driven decision-making, our approach to enhancing access, affordability, and speed of internet services in Guam is firmly rooted in evidence. We are committed to ensuring that any strategic adjustments are justified by robust data and analysis. Our past experiences underscore the importance of accurate and comprehensive information to prevent Guam from being overlooked. As such, should there be a need to consider a different direction in our service enhancement efforts, we will engage in a transparent process with full disclosure. Any potential changes will be meticulously evaluated to ascertain their alignment with the realities of Guam's internet service needs and to ensure they truly serve the best interest of our people.

Community Input: Decisions around these critical areas must involve robust community input. The people of Guam must have a say in shaping their internet services, and this community perspective will ensure that decisions align with real-world needs and priorities. We will engage directly with residents village by village to hear what they have to say about the true state of their service.

Partnerships:

From the outset, we've engaged carriers in individual, confidential discussions to ensure that our action plan is as informed as possible. We understand the competitive nature of their businesses and have created spaces for candid feedback. Rest assured, their voices are heard, and their contributions to Guam are respected; an equitable plan also demands that community stakeholders have an equal seat at the table.

This is not a zero-sum game where one party's gain is another's loss. Victory, in this context, is universally improved access to fast, reliable, and affordable internet, regardless of location or income level. The goal is to foster a climate of collaboration and transparency, aligning all stakeholders in a concerted effort to elevate the digital quality of life for the people of Guam.



Seeking More Funding to Support ACP:

Guam has made significant progress in securing funding for high-speed internet adoption through BEAD and Digital Equity, but our efforts don't stop here. OIPD is actively pursuing additional resources to promote the Affordable Connectivity Program (ACP).

Recently, OIPD received notification of an allocation of \$383,000 in funding from the Federal Communications Commission (FCC) to enhance the promotion of the ACP. Despite outreach efforts by internet service providers to reach eligible Guamanians, we have only seen 1,409 ACP subscribers (as of this writing, November 2023), which is among the lowest figures in the nation and falling significantly short of the number of eligible residents.

Our objective is to use these funds to guarantee that households eligible for this benefit are thoroughly informed about their qualification status through their respective carriers.

Alignment with Guam's Priorities: The BEAD strategy must align with Guam's unique selection of priorities, reflecting its specific context and challenges. This alignment ensures the plan is tailored to Guam's situation, making a more effective and community-driven approach to decision-making in these critical areas to ensure that changes are made judiciously and that they truly serve the people of Guam.

BEAD Fund Priorities:

Guam was considered fully underserved using the FCC's definition of latency as defined in the appropriations portion of the BEAD NOFO. However, as the community has told us on multiple occasions, access is only possible with affordability.

The NOFO addresses the issues related to affordability under the BEAD program, which needs to be considered a priority. Also, the figures of what some call 'fully served' that are provided, must be critically analyzed considering the FCC's shortcomings in mapping the Pacific territories, including Guam.

FCC Maps used for the analysis do not accurately depict the situation in Guam. Our focus on latency is important but is secondary to the real need for affordable and reliable access to underserved areas. Solutions that serve people rather than just technical milestones should be sought.

In working to attract U.S. based content delivery networks (CDNs) in Guam to improve latency to U.S. content for Guam's residents, we firmly commit to focusing our efforts on enhancing access to websites and sources that our community visits. Unlike measurements against hosts in non-English speaking countries, our priority is ensuring



seamless access to sites used in the U.S. mainland, such as Amazon.com, not for example, Amazon.co.jp or Amazon.cn. Measuring latency to new CDNs with content on U.S. soil, we believe, will best serve our people.

Unserved and Underserved Locations:

Unserved means service under 25 Mbps down, 3 Mbps up, and greater than 100ms latency. Another definition of unserved is not getting what you pay for or if you can afford it at all. Recommendations for improving broadband to unserved and underserved locations and addressing Community Anchor Institutions (CAIs) needs are welcome. We intend to take a community-centered approach, prioritizing technical requirements and existing infrastructure. Post-allocation, we will determine our challenge process and our mapped priorities. There is a need to focus on community needs, education, access, and affordability, considering the actual situation in Guam, not merely what is shown in potentially faulty maps.

Consideration of Alternative Eligible Uses

Our focus must be on genuinely assessing community needs and prioritizing latency, speed, and affordable access. Collaborations with local institutions, community involvement, and transparent decision-making must guide the allocation of funds. We also see other projects best handled by concurrent Digital Equity Capacity grants, proposed and transparently procured without business influence.

Hierarchy of Projects

Cooperative approaches that involve community engagement, transparent processes, and prioritizing human welfare over technical and business interests are essential. The primary emphasis must be on the people of Guam, their real needs, and the gaps in service that exist, rather than relying on possibly misleading data and focusing solely on technical aspects. Cooperation, community engagement, and a focus on affordability must be at the forefront of any proposals and actions.

We recognize that nearly everyone in our community is classified as 'underserved.' We intend to change this, and we're willing to explore all means to do so. Whether it's expanding wireless access, building out fiber-to-home connections, understanding the importance of the 'last mile' build-outs, or embracing innovative solutions that may arise, we are committed to ensuring that every Guamanian has access.

After a year of discussion with the FCC, we know all too well that bad data and misplaced priorities can take us off track. But by staying focused on affordability, cooperation, and community engagement, we're ensuring that every proposal and every action we take is aligned with what's best for Guam.



In our steadfast pledge to Guam, we focus on genuine community needs, prioritizing access, affordability, and quality of internet service. We are confident that our partners agree. We proceed without preference, guided by evidence and transparency, to ensure that we meet Guam's unique challenges head on.

2.3 Local Coordination (Requirement 4)

2.3.1 The Guam Office of Infrastructure Policy and Development enjoys strong partnerships with various entities. By positioning within the Guam Office of the Governor, the OIPD is positioned to collaborate with other government agencies and entities, local entities, and institutions of Guam. Broadband is no exception to this, with several strong partnerships critical to the Office's planning and development for internet deployment and adoption. Office of Infrastructure Policy and Development Partners will be consulted in every Stakeholder Engagement phase. Each partner will be encouraged to designate a representative for the broadband team to provide communications, activity coordination, and document draft reviews when needed.

We recognize the essential role of collaborating with Guam's Internet Carriers. We've actively sought their guidance and engaged in discussions that only industry insiders genuinely comprehend. It's reassuring that they share our commitment to ongoing dialogue, understanding that constructive conversations are critical, even amidst differing viewpoints, all contributing to Guam's advancement.

Our approach to partnership and outreach is deeply rooted in the belief that collaboration is the cornerstone of meaningful progress. We understand that addressing digital equity challenges requires a collective effort encompassing a wide range of stakeholders. Our philosophy is all about forging dynamic connections and fostering inclusivity.

We value partnerships across different sectors, from carriers and governmental bodies to educational institutions and cultural preservation agencies. This demonstrates our commitment to involving diverse perspectives, expertise, and resources in our journey to achieve digital equity.

Our outreach efforts are characterized by their adaptability and responsiveness. We meet our partners where they are, whether through virtual meetings, in-person gatherings, or mass media platforms. This flexible approach underscores our dedication to engaging with stakeholders in a manner that suits their preferences and needs.



Transparency and two-way communication are integral to our philosophy. Through discussions, fact-finding sessions, and information-sharing events, we create spaces for open dialogue. This not only enables us to communicate our vision and plans but also empowers our partners to voice their concerns, ideas, and needs.

Our philosophy further recognizes the interconnections among various sectors. By engaging with utility agencies, veterans' offices, the medical community, and more, we acknowledge that digital equity has far-reaching implications that extend beyond just internet access. This holistic perspective drives us to work collaboratively across boundaries.

In essence, our philosophy of partnership and outreach is a journey toward a more connected and equitable future. It's centered on the idea that progress is achieved through collective action, diverse voices, and a shared commitment to making a positive impact.

The overall stakeholder engagement process can be broken down into three phases:

- 1. Initial Data Gathering**
- 2. Action Plan Consensus Building**
- 3. Ongoing Communications over the Entire Course of BEAD**

In the first phase, we actively gathered data to initiate the stakeholder engagement process. We pinpointed key stakeholders and collected insights about the current state of digital equity and broadband access in Guam's underserved communities. Our team reached out to leaders at community anchor institutions, organizations serving covered populations, and members of these populations passionate about promoting digital equity.

Following this, we facilitated workgroup discussions to introduce the BEAD program and sought their invaluable feedback and participation. Our outreach methods spanned media, public speaking, emails, and social media platforms. After identifying our stakeholders, we delved deeper into understanding the nuances of digital equity, broadband access, and the impact of the digital divide on underserved communities. This involved collaborative sessions with various community institutions, non-profits, ISPs, and community members, supplemented by surveys directed at community anchor institutions.

In the second phase, we channeled our energies into building consensus for an action plan that serves the public interest. We envisioned a plan that was comprehensive, impactful, and most importantly, reflective of the nuanced needs of underserved communities. Collaborative dialogue was central to this phase: we partnered with



stakeholders, refining the action plan based on their feedback and ensuring it catered to the requirements of underserved areas. Moreover, we actively incorporated suggestions for projects based on stakeholder input, ensuring their voices directly influenced our strategies. We organized focus group meetings and feedback sessions to further this objective. During this period, we set clear priorities and actionable strategies to meet the BEAD program's objectives, which encompassed outlining specific goals, identifying stakeholders for implementation, and devising metrics to gauge the program's success.

Open communication was the lifeblood of this phase. We actively engaged stakeholders, keeping them in the loop through regular meetings, community sessions, newsletters, and timely updates on social media.

Transitioning to the final phase, labeled "ongoing communications," we aimed to maintain a continuous, productive dialogue with our stakeholders. As the BEAD program team moves forward with the action plan, we will be in lockstep with our stakeholders. This involves monitoring progress, assessing the program's on-ground effectiveness, and recalibrating our strategies rooted in real-time feedback and data. We pledge to remain agile, always open to identifying emerging needs and priorities, achieved through an ongoing series of surveys, focus groups, and stakeholder interviews. Additionally, this phase promises a celebration of collective milestones and accomplishments, fostering a spirit of communal achievement. We will host celebratory events, share uplifting success stories, and shine a spotlight on those pivotal to the program's journey and success.

Each phase, while having a distinct character, champions tailored engagement activities, as outlined for the diverse populations we'll be detailing below:

2.3.1.1 Covered Households

Since there will be so many covered households in Guam, identifying and mapping our key stakeholders involved a significant emphasis on collaborating with individual mayor's offices and the Mayors Council of Guam (MCOG). As local authorities and representatives of their communities, they are instrumental in connecting with marginalized and underrepresented households. Their involvement provides legitimacy and local context to the project. We have and will continue to establish a clear communication line with each mayor's office and the Mayors Council, briefing them about the project objectives, the targeted households, and seeking their support and involvement. They will play a critical role in organizing community forums, town hall meetings, and door-to-door information drives in their respective village.

In the Proposal Phase, the MCOG and the offices will serve as primary channels for our communication strategy. They will help disseminate information about the project and its benefits to their communities, particularly the covered households. Given their direct



interaction with residents, they will be instrumental in communicating how reliable internet access can impact education, telework, and access to health services. The mayor's offices may opt to utilize local radio stations, community bulletin boards, and direct interactions with village residents during community events for this purpose. In the same way, other stakeholders such as internet service providers and non-profit organizations will be engaged, sharing project progress reports and discussing societal and economic benefits.

The Implementation Phase will involve close collaboration with the mayor's offices and the Mayors Council of Guam to encourage and facilitate stakeholder feedback. They may choose to collect and relay the concerns, questions, and suggestions from their communities through village meetings, digital platforms, and communication loops. The project team will work hand in hand with these offices to address the feedback, making necessary adjustments in the project planning and execution. An ongoing evaluation of the engagement plan will be undertaken with the assistance of the mayors' offices to ensure its effectiveness. Their involvement will foster community-driven, transparent, and inclusive project implementation, enhancing the project's success and sustainability.

2.3.2 Tribal

Not Applicable

2.3.3 Aging Individuals

During the initial identification phase we continued to focus on the unique needs of aging individuals in Guam, working closely with Guam's State Office on Aging (GSOA) through the Division of Senior Citizens (DSC), Guam Department of Public Health and Social Services. The Division, along with healthcare providers, senior community centers, and family caregivers, were identified as crucial stakeholders due to their direct connections and understanding of the aging demographic. Our collaboration with the DSC, given their expertise and resources, was invaluable in pinpointing the specific challenges that aging individuals face in accessing broadband services. We will continue to organize town hall meetings, forums, and visits to senior community centers in partnership with these entities, ensuring that the voices and concerns of aging individuals are incorporated into the project.

In the Proposal Phase, we will establish a communication strategy tailored specifically for aging individuals. This strategy will articulate the benefits of broadband access, such as improved access to telemedicine, maintaining social connections, and using essential online services. We will rely on DSC and the MCOG to help disseminate this information using the most accessible and effective channels for the aging population. These channels may include local radio broadcasts, print newsletters, and community events.



During the Implementation Phase, the project team will collaborate with DSC and the mayors offices to facilitate and encourage feedback from the aging population. Regular meetings and feedback loops with officials in senior community centers will serve as avenues for gathering suggestions and concerns. This feedback will then guide ongoing improvements to the project, ensuring that it effectively caters to the specific needs of aging individuals and promotes digital inclusion.

2.3.3 Incarcerated Populations

During the initial identification phase, we addressed the unique needs of incarcerated individuals with a focus on promoting digital equity. We'll continue to work closely with the Guam Department of Corrections (DOC), the Judiciary of Guam, and regional advocacy organizations. As crucial stakeholders, these entities provide invaluable insights into the challenges incarcerated individuals face regarding online access. Specific needs might encompass access to educational materials, legal resources, communication with family members, and mental health services online. We will continue to collaborate with these organizations to gather insight through more meetings, forums, and interviews, ensuring that the project is shaped by the needs of the incarcerated population.

In the Proposal Phase, a communication strategy emphasizing digital equity will be developed. This strategy will highlight the transformative potential of broadband access for incarcerated individuals. Online access can enhance educational opportunities, facilitate legal research, strengthen family connections, and provide mental health resources. The team will work closely with the identified institutions in disseminating this information to incarcerated individuals and their advocates. The information dissemination process will likely involve collaboration with relevant organizations to leverage their communication channels.

During the Implementation Phase, the project team will work closely with these key stakeholders to gather and incorporate feedback from the incarcerated population. Multiple methods will be used to ensure their voices are heard and their concerns addressed, including feedback forms within correctional facilities and ongoing dialogues with advocacy organizations. This feedback will be used to continuously refine and adjust the project to ensure it effectively promotes digital equity among incarcerated individuals in Guam, fostering an environment conducive to rehabilitation and personal growth.

Department of Youth Affairs

The Department of Youth Affairs runs the island's sole juvenile detention center, and we witnessed firsthand the long-term effects of unequal treatment on young people and their families. The majority of these young individuals engaged with the juvenile justice



system lack access to modern technology, including internet connectivity, in their home environments. By closing this digital divide, we can provide a more equal opportunity for success, potentially transforming their futures for the better.

2.3.4 Veterans

Veterans' entities are critical stakeholders due to their direct connections and deep understanding of veterans' unique needs and challenges. Specific digital equity needs for veterans might include access to online mental health resources, telemedicine services, employment opportunities, and digital literacy training. By leveraging the reach and insights of these institutions, we can identify the most impactful ways to improve online access and digital equity for veterans.

In the Proposal Phase, we will craft a communication strategy emphasizing the importance of digital equity for veterans. This strategy will highlight how broadband access can significantly enhance veterans' quality of life, from online job searching and application processes, accessing educational opportunities and benefits, to utilizing telemedicine for healthcare needs. The team will work closely with the identified institutions in disseminating this information to veterans. This could involve presentations and information sessions within these organizations, and the utilization of their communication channels to reach as many veterans as possible.

During the Implementation Phase, the project team works in close coordination with these key stakeholders to gather feedback from veterans. Through mechanisms such as feedback forms, community meetings, and direct communication channels within these organizations, we can gather insights to continuously improve the project. This feedback will guide adjustments to the project, ensuring it effectively addresses the specific needs of veterans in Guam and promotes digital equity. By providing veterans with reliable online access, we can facilitate their reintegration into civilian life and help them leverage the digital resources they need to thrive.

2.3.5 Individuals with Disabilities

In the initial phase of the Broadband Equity Access and Deployment project in Guam, we engaged with critical stakeholders - the Guam Department of Integrated Services for Individuals with Disabilities (DISID) and the Guam Legal Services Corporation – Disability Law Center (GLSC-DLC). These institutions are fundamental in advocating for the rights and services for individuals with disabilities. Together, we explored the unique digital needs of this community, which included considerations for assistive technologies, enhanced accessibility in online platforms, and custom digital literacy programs.



During the Proposal Phase, we will collaboratively develop a robust communication strategy that underscores the essential role of digital equity for individuals with disabilities. This strategy will highlight the transformational impact of broadband access in diverse areas such as telemedicine, online education, social connectivity, and employment. The identified institutions will be vital partners in ensuring our messaging is effectively conveyed and understood by the community. We will prioritize accessible formats and universal design principles in our communication materials.

In the Implementation Phase, we will sustain our collaboration with the identified institutions, leveraging their expertise to gather and interpret feedback from the disabled community. Our feedback mechanisms will prioritize accessibility, employing methods such as virtual consultations and feedback forms designed for easy comprehension. The insights obtained will steer ongoing refinement of the project, ensuring it remains beneficial and relevant for individuals with disabilities. Our end goal is to create a more inclusive and equitable digital environment in Guam, serving the needs of all its residents.

2.3.6 Individuals with a Language Barrier

During the initial identification phase, the Broadband Equity Access and Deployment project team liaised with the Guam Department of Education (DOE), the University of Guam, and the Guam Community College. These institutions are crucial to address language barriers experienced by Guam's diverse population.

In the Proposal Phase, a communication strategy will be developed that emphasizes digital opportunity for individuals with language barriers. This strategy will highlight how broadband access can facilitate online education, job opportunities, telemedicine services, and social engagement. In order to communicate with individuals and groups with low written literacy, the project team will collaborate with local media outlets to ramp up verbal communications in commonly spoken languages in Guam, focusing on radio broadcasts, social media campaigns, and community outreach events.

During the Implementation Phase, feedback from the community will be pivotal. The project team will solicit feedback in multiple languages, ensuring a wide range of perspectives are taken into account. This may involve community meetings with translation services, bilingual feedback forms, and virtual town halls held in appropriate languages. The insights gained from this feedback will inform the ongoing refinement of the project, guaranteeing that it effectively meets the unique digital equity needs of Guam's linguistically diverse population. Ultimately, the project aims to provide inclusive online access, bridging the digital divide and creating a digital landscape that serves all residents of Guam.



2.3.7 Racial or Ethnic Minority Groups

Guam is home to one of America's most diverse populations. In order to achieve digital equity for these groups, it is crucial that we work closely with various community organizations that represent different racial and ethnic groups. The following list details examples of potential digital equity initiatives for a selection of these organizations (Guam has many more beyond this list), focusing on harnessing the potential of digital tools and broadband access to further each group's specific mission and needs. Please note that these examples are hypothetical only, and are intended to communicate the direction in which the program intends to deliver services.

1. Developing a digital marketplace for CHamoru businesses, encouraging economic development within the community and enhancing the digital literacy of CHamoru entrepreneurs geared towards the preservation of Guam's unique CHamoru language and culture.
2. Guam Filipino Organizations: Promoting digital literacy among Filipino entrepreneurs and developing an online platform for Filipino-owned businesses to boost their visibility and access to the broader Guam market.
3. Guam Chuukese Community: Implementing a digital education program focused on enhancing the employability of the Chuukese community, including language software for English learners and digital job placement assistance.
4. Developing a virtual wellness hub tailored to Micronesian women, offering resources such as online health education and counseling services, and forums to encourage peer support and connection.
5. Guam Community College: Initiating a mentorship program leveraging video conferencing tools to connect All Study Abroad (API) internship students with successful alumni and professionals within their fields of study.
6. Guam Council on the Arts and Humanities: Establishing an online platform showcasing art from minority and underserved communities, alongside tutorials and workshops in digital arts, enabling wider reach for artists and fostering new digital skills.
7. Guam Women's Organizations: Leveraging digital platforms to deliver leadership and economic empowerment programs, facilitating access to online resources and support networks for women from diverse backgrounds.
8. Implementing an online cultural exchange program that encourages interaction and understanding among different cultures on Guam, using multimedia resources and interactive platforms.
9. Establishing a digital resource center providing educational and employment services for the Micronesian community, including online courses and job boards specifically curated for their needs.

As can be seen, each of these potential projects represents a unique opportunity to



promote digital equity within Guam's diverse racial and ethnic communities. By collaborating with these representative organizations and groups and tailoring initiatives to meet the specific needs of each, the team will play a pivotal role in ensuring every individual in Guam has the opportunity to reap the benefits of global digital societies and economies.

2.3.8 Rural Individuals

All residents, businesses, and institutions of Guam are considered rural by the United States Department of Agriculture. While this means that there will not be a particular focus on rural individuals with respect to data gathering activities and general stakeholder engagement, it also presents an opportunity for the Guam Office of Infrastructure Policy and Development Broadband Team to communicate with all entities about specific broadband and digital equity opportunities available—from USDA and other federal partners—due to that rural characterization. During initial data gathering activities, the project team can enter discussions, aware of which opportunities might be available for the stakeholders being engaged. Finally, during ongoing communications, the team will continue to communicate new opportunities for rural entities and individuals to the public as part of its overall dissemination of information.

2.3.9 Local Coordination Tracker

A draft version can be found here:

https://docs.google.com/spreadsheets/d/1XMsSCOsJ4FLg3AM5YpmD1_km3FcbY9iik/edit?usp=sharing&ouid=115797251200433604935&rtpof=true&sd=true

In developing Guam's proposals and ongoing efforts, we're embracing a comprehensive approach that involves the community at every level. We're facilitating town hall meetings not just as forums for speaking, but as platforms for listening and true dialogue. This is where the community's voice can be heard loud and clear, guiding us toward an internet infrastructure that serves their needs.

Engagement with special interest groups is an ongoing commitment. These meetings are less about presentation and more about conversation—delving into the community's concerns and aspirations to inform our strategies.

Collaboration with ISPs is also critical. Our work with them is founded on transparent dialogue and shared objectives, ensuring that the services provided meet the standards of affordability, reliability, and speed that Guam deserves.

Coordination with government agencies is similarly integral. We're joining forces to cut through red tape and make certain that our collective resources are being used efficiently and effectively for the benefit of all.



And it doesn't stop there. We're also taking the initiative to engage directly with the public at local events, gathering feedback and building trust. These aren't just fleeting interactions, but meaningful exchanges that enrich our plan with diverse perspectives.

In every interaction, we're guided by a sense of service and a commitment to deliver lasting, meaningful improvements to Guam's internet landscape.

We want to set the bar for connectivity in Guam, and we're doing it with diligence, integrity, and a keen sense of responsibility.

DRAFT



Engagement Tracker

Engagement Tracker		Engagement Title	Engagement Type	Engagement Location	Target Audience	Target Audience Location	# Engaged	Notes
<p>Instructions: Use the BEAD Semi-Annual Report Attachment, Engagement Tracking Tab to provide information on engagements: a) funded by the BEAD Program Initial Planning funds; and b) during the reporting period. Please include as an attachment to this BEAD Semi-Annual Performance (Technical) Report to be submitted on the NTIA Grants Portal (NSF).</p> <p>Engagement Title: Include a brief title of the engagement (i.e., publications, outreach, and communications support; technical assistance; training; surveys; local coordination).</p> <p>Engagement Type: Select the type of engagement (e.g., virtual, print, in-person, other).</p> <p>Engagement Location: If applicable, please include the details of the engagement (e.g., virtual, print, in-person, other).</p> <p>Engagement Location: If applicable, please include locations of where the support was conducted, disseminated, etc.. If the engagement was virtual, please include "virtual" and, if available, the link.</p> <p>Target Audience: Include a brief description of who the target audience was.</p> <p>Target Audience Location: Select from the dropdown the target audience location (i.e., local, regional, statewide).</p> <p># Engaged: Include the estimated number of people reached by the engagement (e.g., number of outreach material disseminated, number of participants, number of respondents).</p> <p>Notes: If applicable, add additional context that may be important to understand the engagement, the topics the materials covered, etc. (Optional)</p>								
Technical Assistance	Meeting to Discuss FCC Broadband Fabric Challe Virtual	1/9/23 Google Meet	Virtual	Carriers	Statewide	7	Engaging local carriers regarding their participation in the BDC and FCC Mapping Pacific Territory Broadband Offices weekly platform to discuss, share or bring up issues and/or concerns between Territory Broadband Offices and Federal Agencies.	
Technical Assistance	Meeting with Territory Broadband Offices	1/12/23 MS Teams Weekly	Virtual	Other Territory Offices	Regional	49	49 Agencies.	
Local Coordination	Meeting with Mayors Council of Guam	Mayor's Council of Guam 215A 3/21/23 Suite 111F Papa Juan Pabou Dos	In-Person	Village Mayors	Statewide	19	Describing internet for all programs and information gathering session.	
Publications, Outreach, and Communications Support	Stakeholder Discussion	2/28/23 Guam	In-Person	Representative organizations for covered populations	Statewide	11	Introduction to the BEAD and Digital Equity and Initial Idea gathering	
Technical Assistance	Guam Department of Education and Infrastructure In-Person	211 Aspinall Ave, Hagåtña, 96910, 501 Mariner Ave, Barrigada, 96913, Guam Bldg 8, 3rd Floor.	In-Person	Department of Education	Statewide	15	Meeting to discuss issues of Digital Equity issues and Department of Education	
Technical Assistance	BEAD Broadband Branch for Island Stakeholders Print	3/10/23 Superintendent's Office 3/15/23 MS Teams Weekly	In-Person	Territorial Stakeholders	Regional	59	Meeting to all the Pacific Island Discussion of coordination and implementation of BEAD	
Local Coordination	OTECI DISCUSSION	4/3/23 211 Aspinall Ave, Hagåtña, 96910 Guam Office of Technology	In-Person	Guam Office of Technology	Statewide	6	Strategies	
Publications, Outreach, and Communications Support	General Public, Students, and Government of CA Print	2/28/23 Office of the Governor of Guam	In-Person	Guam Department of Education, Guam Department of Administration	Statewide	26619	Distribution of flyers in print, poster, and Virtual Distribution to Government of Guam Employees and GOOE Students regarding the importance of quality of internet service.	
Publications, Outreach, and Communications Support	Educator Digital Equity Stakeholders Discussion	3/2/23 96913, Guam	In-Person	Guam Department of Education	Statewide	17	Meeting to gather information and stakeholder input regarding the digital equity needs of the island's educational systems, existing infrastructure, and plans	
Publications, Outreach, and Communications Support	Mayors Meeting	3/7/23 Suite 111F Guam Department of Education	In-Person	Mayors' Council of Guam	Statewide	8	Fact-finding and discussion regarding Digital Equity and BEAD. Discussion of the Digital Equity and BEAD program, village locations, and affordability	
Publications, Outreach, and Communications Support	Deployment planning informational flyer	3/20/23 96913, Guam	In-Person	Leaders of Public, Private Schools, Districts, Colleges and Universities, Library System	Statewide	9	Continuing Discussion with Guam Department of Education with focus on Technology	
Publications, Outreach, and Communications Support	Public updates and explanation of the BEAD Prog Other	3/14/23 h67 Talk Radio	In-Person	General Public	Statewide	3000	Live discussion on radio to disseminate information on BEAD program. DE	
Publications, Outreach, and Communications Support	Low Income Housing Discussion Stakeholder Agt In-Person	3/23/23 5095 Marine Corps Dr, Tamuning	In-Person	Guam Housing Corporation, Guam Housing and Urban Renewal	Statewide	15	Discussion of needs, resources, and implementation of BEAD Strategies and Digital Equity needs from the representative agencies tasked with low-income housing and clients of those agencies	
Publications, Outreach, and Communications Support	Utility Outreach	3/30/23 Guam	In-Person	Guam Power Authority	Statewide	12	Information sharing and gathering as well as discussion about BEAD and DE	
Publications, Outreach, and Communications Support	Provider Outreach	3/30/23 MS Teams	Virtual	ITRE	Statewide	13	Fact-finding and feasibility discussion regarding Digital Equity and BEAD. Discussion of technology and budget process of BEAD and DE.	
Publications, Outreach, and Communications Support	Medical Community Outreach	3/31/23 Tamuning, 96913, Guam	In-Person	Medical Insurance, Hospitals, Doctors, Clinic Administration, Medical Technologies	Statewide	12	Information sharing and gathering as well as discussion about BEAD and DE. Fact-finding and discussion regarding Digital Equity and BEAD. Discussion of technology and budget process of BEAD and DE. Discussion of how BEAD and DE may benefit the medical community practitioners and patients. Also low current state of faces affects treatment.	



Local Coordination	OTTECH Discussion	In-Person	4/3/23	Office of Technology – Government of Guam, 211 Aprinal Ave, Hagåtña, 96910, Guam	Guam Office of Technology, local govt institutions	Statewide	Meeting to discuss BEAD and DE integration with Office of Technology, existing programs, and possible uses.
Publications, Outreach, and Communications Support	Veterans Affairs Meeting	In-Person	4/5/23	Veterans Affairs Office Towers Building, 253 Senator Juan Tim Tones St., Agaña, 96913, Guam	Directors and staff of Veterans Affairs	Statewide	Fact-finding and discussion regarding Digital Equity and BEAD. Discussion of technology and suggest process that may help address the needs of the veteran community. Discussion of challenges advancing services to veterans and 8 connection with ACP.
Publications, Outreach, and Communications Support	Veterans Outreach	In-Person	4/6/23	K57 Public Radio 962 Pale Sam Vitoras Rd #116, Tamuning, 96913, Guam	"vet Talk" Evening Show	Statewide	Guests for the full vet talk show to spread awareness amongst the general public and veterans in particular and how they are affected by the Digital Divide.
Publications, Outreach, and Communications Support	Travel Industry Meeting	In-Person	5/2/23	Antonio B. Won Pat International Airport 355 Chalan Pasaheñ B224-A, Tamuning, 96913, Guam	Guam Airport Authority/leadership and Starland Guam Visitors Bureau	Statewide	Fact-finding and discussion regarding current state of service that affects Guam's 10 major industry.
Publications, Outreach, and Communications Support	General Public Outreach	Virtual	5/2/23	K57 Public Radio 962 Pale Sam Vitoras Rd #116, Tamuning, 96913, Guam	Morning Talk Show	Statewide	Discussion of the creation of the BEAD and the need and creation of Guam's first 3000 Digital Equity Plan
Publications, Outreach, and Communications Support	General Public Outreach	Virtual	5/2/23	K57 Public Radio 962 Pale Sam Vitoras Rd #116, Tamuning, 96913, Guam	Morning Talk Show	Statewide	Discussion of Broadband Programs with focus on ACP
Publications, Outreach, and Communications Support	Provider Outreach	In-Person	5/3/23	121 Robot Street, Maite, Guam	Pacific Data Systems	Statewide	Internet Provider information sharing and gathering as well as discussion about 6 BEAD and DE
Publications, Outreach, and Communications Support	Arts and Humanities, Cultural Preservation	In-Person	5/19/23	Aelga, 285 Farenholt Ave Suite C-302, Tamuning, 96913, Guam	Guam Department of Chamorro Affairs, Guam Museum, and Chamorro Language Commission	Statewide	Fact-finding and discussion regarding Digital Equity and BEAD. Discussion of current state of service possibilities of how increased universal access can affect the missions of indigenous Cultural
Publications, Outreach, and Communications Support	Educational Community Outreach	In-Person	5/24/23	School of Business and Public Administration (SBRPA) President's Conference Room 2nd floor.	University of Guam and Guam Community College	Statewide	12 Prioritization. Discussion of BEAD and DE in education and preliminary input on Workforce 8 Planning
Publications, Outreach, and Communications Support	General Public Outreach	Virtual	5/28/23	K57 Public Radio 962 Pale Sam Vitoras Rd #116, Tamuning, 96913, Guam	Morning Talk Show	Statewide	Ongoing public outreach through mass media, discussion of BEAD and DE programs, importance of speed, 3000 allocation, and affordability
Publications, Outreach, and Communications Support	Medical Community Outreach	In-Person	6/13/23	Guam Seventh-day Adventist Clinic 388 148, Tamuning, 96913, Guam	Seventh Day Adventist Clinic Technologists and Medical Personnel	Statewide	Fact-finding and discussion regarding Digital Equity and BEAD. Discussion of the integration of internet services with clinic operations, real use cases for patients and 5 information about municipal wifi.



2.4 Deployment Subgrantee Selection (Requirement 8)

2.4.1 Deployment Projects Subgrantee Selection Process & Scoring Approach

The Office of Infrastructure Policy and Development (OIPD) welcomes all eligible organizations to submit their grant or subgrantee applications for consideration.

To ensure a fair evaluation process, OIPD requires that all grant applications be submitted in a standardized format, which will be made available on our website. The application should include a detailed project description, budget breakdown, and measurable outcomes. Applicants must also demonstrate a clear understanding of the needs of the community they seek to serve and the ability to implement the proposed project effectively.

To ensure alignment with our mission, OIPD requires that grant applications be scored on their merits of alignment with the Broadband Equity Access and Deployment federal grant. We strongly encourage applicants to review this grant program's eligibility criteria and requirements before submitting their application.

All grant applications will be evaluated by a committee of subject matter experts who will assess each application on its own merits. Applications will be scored based on several factors, including the proposed project's potential impact on the community, the project's feasibility, the applicant's capacity to implement the project successfully, and the alignment with the Broadband Equity Access and Deployment grant program.

OIPD is committed to a fair, objective, and transparent evaluation process. All applicants will receive a notification of the decision on their application, and we welcome any questions or feedback on the evaluation process.

To apply, interested organizations must follow the steps below:

1. Review the grant guidelines and eligibility requirements on the OIPD website.
2. Complete the grant application form and submit all required documentation, including a detailed technical proposal and separate sealed budget plan. Unless otherwise indicated, deadlines will be 5 p.m. (Chamorro Standard Time) of the stated deadline, emailed to broadband@guam.gov in PDF format. Any proposals received after the deadline will not be accepted. An original hard copy and a number of copies to be determined by OIPD must be submitted to the Office within the first 5 days of the deadline.



3. The question and answer period to OIPD will be determined by OIPD, and announced in the published advertisement in a local newspaper of general circulation.

4. Applications will be evaluated and scored based on their alignment with the Broadband Equity, Access, and Deployment (BEAD) federal grant.

5. Finalists will be notified and may be invited to submit additional information or participate in an interview with the OIPD.

6. Grant recipients will be notified and provided with detailed instructions for next steps, including project reporting and compliance requirements.

2.4.2 Text Box: Describe how the prioritization and scoring process will be conducted and is consistent with the BEAD NOFO requirements on pages:

The OIPD ensures that the prioritization and scoring process adheres strictly to the BEAD NOFO requirements, emphasizing a transparent and equitable evaluation of proposals. Our approach meticulously balances cost-efficiency, technological innovation, and speed of deployment against the backdrop of federal guidelines. Priority is given to projects that demonstrate not only an immediate impact on connectivity but also long-term sustainability, workforce development, and local community engagement. We apply a scoring system rooted in quantifiable metrics, ensuring every application is assessed with fairness and precision. Proposals reflecting affordability, fair labor practices, and robust local engagement receive higher scores. This process is underpinned by a commitment to continuous oversight, guaranteeing our methods evolve alongside the needs of the communities we serve. By adhering to these principles, the OIPD remains focused on achieving a transformative impact on Guam's digital landscape, setting a precedent for responsibility, efficiency, and innovation.

2.4.2.1 Scoring Rubric

Submit the scoring rubric to be used in the subgrantee selection process for deployment projects. Eligible Entities may use the template provided by NTIA, or use their own format for the scoring rubric:

Proposed Scoring Rubric for BEAD Program Applications:

1. Technology and Performance (50 points)

- a. Deployment of end-to-end fiber-optic solutions or high-speed fixed wireless that exceeds the required performance benchmarks for speed, latency, and reliability (40-50 points).



- b. Meets essential benchmarks with a robust strategy for either fiber-optic or fixed wireless technologies, providing consistent quality and reliable connectivity (20-39 points).
- c. Proposes a solution that meets minimum requirements for speed and reliability but lacks a clear edge in performance or future scalability (0-19 points).

2. Scalability and Evolutionary Potential (25 points)

- a. Network infrastructure can easily scale to meet future requirements and is designed for longevity with minimal future investment, including wireless solutions where appropriate (20-25 points).
- b. Adequate scalability for current and near-future needs, with a mix of fiber and fixed wireless solutions that demonstrate potential for expansion and upgrading (10-19 points).
- c. Limited scalability or future-proofing, suggesting potential for significant future costs or upgrades (0-9 points).

3. Cost-Effectiveness and Affordability (20 points)

- a. Low-Cost Plan Availability (6 points): Proposals that present plans priced at or under \$50, prioritizing access for economically disadvantaged demographics, will receive the highest marks. This should include a variety of plan options, with an emphasis on high-speed fixed wireless services where applicable, that deliver adequate performance at minimal cost. The inclusion of a low-cost tier demonstrates the provider's commitment to widespread affordability.
- b. Value of Middle-Cost Plan Options (6 points): Proposals offering plans in the \$50 to \$75 range will be scored for their ability to balance cost with quality and service enhancements suitable for a wide customer base. Such plans should offer improved speeds or data capacities. Proposals that leverage high-speed fixed wireless technologies to provide high-value services within this price bracket will be considered positively.
- c. Overall Cost Advantage (3 points): Proposals will be evaluated on their ability to offer more features or better service at the same or lower cost compared to the current market rates for comparable services. This assessment will favor providers aiming to shift market standards by offering cost-efficient fiber or high-speed fixed wireless services without sacrificing quality.

- d. **Price Stability Commitment (2 points):** Proposals with competitive introductory pricing that also provide guarantees or measures for price stability, particularly over multi-year service contracts, will be awarded points. This ensures long-term affordability and protects consumers from short-term pricing strategies.
- e. **Minimization of Additional Costs (3 points):** Proposals will earn points for demonstrating the lowest post-installation costs, such as minimizing or eliminating fees for equipment rental like routers. This criterion assesses the provider's commitment to keeping the total cost of ownership low for the end-user, ensuring the advertised affordability extends beyond the base service charge.

4. Maintenance, Repair, and Environmental Oversight (10 points)

- a. Demonstrates proactive and comprehensive strategies for ongoing inspection, repair, and environmental stewardship, applicable to both fiber and fixed wireless deployments (8-10 points).
- b. Maintains an adequate schedule for inspection and repair with satisfactory environmental assessment for all infrastructure types (4-7 points).
- c. Limited or reactive approaches to maintenance, repair, and environmental care, which may risk long-term sustainability (0-3 points).

5. Service Options and Terms Compliance (15 points)

- a. Fully adheres to proposal terms with a diverse range of service options from low to middle cost, including fixed wireless (12-15 points).
- b. Shows partial compliance with proposal terms, offering limited service options for fiber and fixed wireless (6-11 points).
- c. Lacks compliance, failing to provide an adequate range of service options for the technologies deployed (0-5 points).

6. Labor Standards and Protection Compliance (10 points)

- a. Exceeds labor standards, promoting fair labor practices across all deployed technologies (8-10 points).
- b. Meets labor standards with room for improvement in worker protections (4-7 points).
- c. Inadequate adherence to labor standards, potentially affecting project sustainability and workforce morale (0-3 points).

2.4.3 Prioritization within the Subgrantee Selection Process



To achieve the overarching goal of comprehensive broadband coverage, our subgrantee selection process is meticulously designed to prioritize Unserved Service Projects. Here is our structured approach:

1. Defining 'Unserved' and 'Underserved':

We establish clear definitions for 'unserved' and 'underserved' locations, based on data-driven thresholds for broadband speeds and service availability.

2. Mapping and Data Analysis:

Utilizing detailed mapping and data collection, we identify all unserved locations. This data is the cornerstone of our prioritization framework.

3. Tiered Funding Rounds:

Our funding is released in tiered rounds, with the initial round exclusively dedicated to Unserved Service Projects. Only after the Unserved Service Projects are fully funded do we consider applications for Underserved Service Projects.

4. Scoring System with Built-In Priorities:

Applications are scored on a system that heavily weights the service to unserved areas. Projects that do not address unserved locations will inherently score lower and thus be ranked lower in priority.

5. Conditional Funding for CAIs:

CAIs are a priority only if they are in unserved areas for the first round. Subsequent rounds will consider CAIs in underserved regions, ensuring that these critical institutions are enhanced after unserved locations are addressed.

6. Mandatory Progress Milestones:

Funded projects must meet specific milestones demonstrating service to unserved locations before they can receive full funding, guaranteeing that these projects are on track for completion as prioritized.

7. Transparency and Public Input:

We maintain transparency throughout the process, allowing for public input to ensure that the prioritization reflects the actual needs of the community and the intent of the BEAD program.

8. Adjustments Based on Implementation:

As projects progress, we continually reassess our coverage data to update and refine our prioritization, ensuring ongoing alignment with the goal of first serving all unserved locations.



2.4.4 Text Box: If proposing to use BEAD funds to prioritize non-deployment projects prior to, or in lieu of the deployment of services to eligible CAIs, provide a strong rationale for doing so. If not applicable to plans, note “Not applicable.”

Proposals choosing to prioritize BEAD funds for non-deployment projects before or instead of deploying services to eligible Community Anchor Institutions (CAIs) must articulate a compelling justification. The rationale should align with community-specific needs that substantiate how such an approach would more effectively achieve the program’s overarching goals.

1. **Strategic Community Impact (10 points):** A persuasive argument that details how the non-deployment initiative will deliver immediate and strategic benefits to the community, potentially serving as a catalyst for broader deployment initiatives.
2. **Long-term Enablement (5 points):** Clearly outlined ways in which the non-deployment project lays the groundwork for future service deployment, thereby not negating but enhancing the prospect for CAIs to receive improved services.
3. **Cost-Benefit Analysis (5 points):** A cost-benefit analysis should be provided, demonstrating that the non-deployment project presents a greater value or urgency relative to direct service deployment.
4. **Alignment with BEAD Objectives (20 points):** Explain how non-deployment projects still adhere to the fundamental objectives of BEAD, considering the long-term benefits and alignment with digital inclusion.
 - a. **Advancement Towards Goals (10 points):** Detailed explanation of how the proposed project advances towards BEAD goals, including but not limited to promoting broadband adoption, digital literacy, and the provision of essential services.
 - b. **Supporting Deployment Readiness (10 points):** If non-deployment projects serve as a preliminary phase to deployment, describe how they will create a conducive environment or address barriers that would otherwise impede the successful implementation of deployment projects.
5. **Compliance and Contingency Planning (20 points):** Proposals must explain how they remain in compliance with BEAD requirements despite the focus on non-deployment projects and must include a contingency plan that outlines a clear pathway to service deployment to eligible CAIs.
 - a. **Regulatory Compliance (10 points):** Assurance that all non-deployment activities are within the regulatory and statutory bounds set by the BEAD program.



- b. **Deployment Contingency Plan (10 points):** A robust contingency plan that guarantees the eventual deployment of services to eligible CAIs, including milestones and timelines.

2.4.5 Text Box: The proposed subgrantee selection process is expected to demonstrate to subgrantees how to comply with all applicable Environmental and Historic Preservation (EHP) and Build America, Buy America Act (BABA) requirements for their respective project or projects. Describe how the Eligible Entity will communicate EHP and BABA requirements to prospective subgrantees, and how EHP and BABA requirements will be incorporated into the subgrantee selection process.

In addressing the integration of Environmental and Historic Preservation (EHP) and the Build America, Buy America Act (BABA) requirements into the subgrantee selection process, especially considering cost implications specific to Guam, the Office of Infrastructure Policy and Development (OIPD) will implement the following strategies:

EHP and BABA Requirements Communication:

- OIPD will provide comprehensive guidance materials on EHP and BABA compliance through a digital portal to ensure that all prospective subgrantees have access to necessary information.
- A dedicated section for frequently asked questions (FAQ) will be available, alongside a direct inquiry feature for bespoke questions regarding compliance.

Selection Process Integration:

- Subgrantee applications must present a detailed EHP and BABA compliance plan, which will be critically evaluated for its depth and practicality.
- The scoring criteria will include a measure of each subgrantee's readiness to comply with EHP and BABA standards, integrating these considerations from the earliest stages of project planning.

Consideration of Waivers and Cost Impact:

- OIPD expects subgrantees to submit a comprehensive cost impact study regarding BABA compliance and the effect of potential waivers.
- Proposals should articulate strategies to maintain BABA compliance, detailing contingency plans should waivers not be granted, thereby ensuring project viability.

Strategies for Cost Management:

- The evaluation process will favor proposals that demonstrate innovative strategies to navigate the additional costs imposed by BABA and the Jones Act without compromising compliance.



- OIPD will closely collaborate with subgrantees to address the financial challenges posed by these regulations, promoting transparency and foresight in managing material sourcing and project execution.

Last-Mile Broadband Deployment Project Areas

2.4.6 Text Box: Describe how the Eligible Entity will define project areas from which they will solicit proposals from prospective subgrantees. If prospective subgrantees will be given the option to define alternative proposed project areas, describe the mechanism for de-conflicting overlapping proposals to allow for like-to-like comparisons of competing proposals.

Defining Project Areas:

- **Geographic Analysis:** Utilizing geographic information systems (GIS) and consulting expertise, we will map the current state of broadband access, identifying unserved and underserved areas.
- **Stakeholder Input:** We will gather input from local communities, businesses, and other stakeholders to understand the specific needs and priorities for broadband services in each area.
- **Modular Solicitation:** Proposals will be solicited based on clearly defined geographic units that can range from individual locations to larger census block groupings or villages, ensuring a focused approach to service delivery.

Engagement with Consultants and Vendors:

- **Expertise Sourcing:** Consultants with specialized skills in broadband planning and infrastructure will be retained to assist with the creation of project area definitions, evaluation criteria, and the review of proposals.
- **Deconfliction Mechanism:** A vendor will be contracted to develop a transparent system for managing overlapping proposals, enabling subgrantees to negotiate resolutions while maintaining visibility for the Eligible Entity.
- **Procurement Strategy:** We will comply with Guam procurement law to secure these services, emphasizing clear communication of our objectives, desired outcomes, and the need for interoperability with existing efforts.

Mechanism for De-conflicting Overlapping Proposals:

- **Transparent Portal:** The deconfliction mechanism will be an online portal where subgrantees can submit their proposals, see other submissions, and engage in dialogue to resolve overlaps.
- **Proposal Evaluation:** A score-based system will be developed to compare proposals on a like-for-like basis, facilitated by the expertise of our consultants.

Public-Private Partnerships and Staff Augmentation:



- We recognize the importance of leveraging private sector innovation and will actively seek partnerships with capable providers.
- For areas not addressed by internal capabilities, we will procure staff augmentation services to provide necessary expertise and support.

Capacity Building and Integration:

- Training programs (including GIS) may be initiated for current staff to enhance their ability to manage and maintain new broadband infrastructure.
- All consultants and vendors will be integrated into existing initiatives to ensure cohesive and coordinated efforts across the project’s lifespan.

2.4.7 **Text Box:** If no proposals to serve a location or group of locations that are unserved, underserved, or a combination of both are received, describe how the Eligible Entity will engage with prospective subgrantees in subsequent funding rounds to find providers willing to expand their existing or proposed service areas or other actions that the Eligible Entity will take to ensure universal coverage.

In descending order:

In the event that no proposals are received to serve locations identified as unserved, underserved, or a combination thereof, the OIPD will take the following proactive steps to engage with prospective subgrantees in subsequent funding rounds:

1. **Targeted Outreach:**
 - i. Initiate direct contact with providers who have existing infrastructure near the unserved or underserved areas.
 - ii. Host informational webinars detailing the specific needs of these areas and the incentives available for service expansion.
2. **Enhanced Incentives:**
 - i. Introduce preferential scoring for grant applications that aim to serve these high-need areas.
3. **Public-Private Partnerships:**
 - i. Work with utility companies for potential infrastructure-sharing agreements that could facilitate expansion.
4. **Market Analysis and Feasibility Studies:**
 - i. Conduct market analysis to identify potential barriers to service providers entering the market.
 - ii. Perform feasibility studies to present providers with data-driven assurances on the sustainability of serving these areas.
5. **Aggregate Demand:**



- i. Gather commitments from residents and businesses in unserved and underserved areas to demonstrate demand to potential providers.
 - ii. Utilize pre-subscription campaigns as a tool to showcase community interest and potential return on investment.
- 6. Revised Solicitation Process:**
- i. If required, refine the solicitation process to allow for flexible project area definitions that may be more appealing to providers.
 - ii. Develop a clear and transparent process for revisiting unserved areas in future funding rounds.
- 7. Community Engagement:**
- i. Involve community leaders and local government in outreach efforts to advocate for their constituents' broadband needs.
 - ii. Encourage community-led initiatives to garner attention from potential service providers.

2.4.8 Text Box: Describe how the Eligible Entity intends to submit proof of Tribal Governments' consent to deployment if planned projects include any locations on Tribal Lands.

N/A

Extremely High Cost Per Location Threshold

2.4.9 Text Box: Identify or outline a detailed process for identifying an Extremely High Cost Per Location Threshold to be utilized during the subgrantee selection process. The explanation must include a description of any cost models used and the parameters of those cost models, including whether they consider only capital expenditures or include operational costs for the lifespan of the network.

Cost Model Adoption:

The process begins by adopting a cost model that has been tested and validated in similar environments to Guam. Models may include the FCC's CostQuest model, the Broadband Statistical Model, or any other that aligns with Guam's unique geographic and demographic characteristics.

Defining Parameters:

The selected cost model will consider both capital expenditures (CapEx) for the deployment of the network infrastructure and operational expenditures (OpEx) across the expected lifespan of the network (usually a period of 20-25 years).



Factors such as terrain difficulty, population density, labor costs, materials costs, climate challenges, and existing infrastructure will be accounted for in the cost model.

Threshold Criteria Development:

The Eligible Entity will determine the 'Extremely High Cost Per Location' by setting a benchmark that reflects the upper limit of reasonable cost-effectiveness based on the selected cost model.

This benchmark will factor in Guam's economic conditions and the need for affordable service post-deployment, ensuring that costs do not undermine the sustainability of service provision.

Consultation with Stakeholders:

Input from industry experts, potential subgrantees, and financial analysts will be sought to refine the cost threshold.

Public consultations will also help validate the threshold, ensuring it aligns with community expectations and the realities of network operation in Guam.

Operational Cost Inclusion:

Operational costs, including maintenance, service upgrades, customer support, and network management, will be projected and included in the threshold to ensure long-term viability.

The cost per location will incorporate projected revenue streams and potential subsidies to maintain operational sustainability without excessive user fees.

Cost Model Utilization:

Applying the Threshold:

During the subgrantee selection process, the Extremely High Cost Per Location Threshold will be applied as a filter to identify proposals that are cost-effective and sustainable.

Proposals exceeding the threshold will require a detailed justification, demonstrating extraordinary circumstances or showing how the project would serve a critical need that justifies the higher investment.

Periodic Review and Adjustment:



Recognizing the dynamic nature of costs in the telecommunications industry, the threshold will be reviewed annually and adjusted to reflect changes in the market, technology advancements, and shifts in regulatory environments.

Transparency and Documentation:

All determinations regarding the Extremely High Cost Per Location Threshold will be thoroughly documented, and the rationale will be made transparent in the interests of fairness and accountability.

The methodology, including any cost models and parameters used, will be available for public review to ensure an open and trust-based process.

Addendum: Inclusion of CAIs in Historical Sites and Preserved Areas:

Special Consideration for Cultural and Historical Significance:

Community Anchor Institutions (CAIs) that are located within historical sites and preserved areas often face unique challenges and costs associated with broadband deployment due to their sensitive locations.

These CAIs will be given special consideration under the Extremely High Cost Location (EHCL) threshold due to the need for specialized deployment techniques, preservation compliance, and potential archaeological assessments.

Adjustment in Cost Models:

The cost models utilized will include additional parameters for CAIs in these areas, factoring in the complexities of infrastructure development in protected and heritage sites.

This may include non-invasive installation practices, visually unobtrusive equipment, and potentially higher labor costs due to the specialized nature of the work required in such sensitive areas.

Heritage Preservation Compliance Costs:

The cost threshold will also take into account any additional expenses incurred from compliance with local heritage preservation laws, environmental impact assessments, and community consultations.

This recognizes the importance of maintaining the integrity of Guam’s cultural and historical landmarks while also providing modern connectivity solutions.



Alignment with Preservation Goals:

In defining what constitutes an 'extremely high cost' for CAIs in historical and preserved areas, there will be an alignment with Guam's overarching goals of cultural preservation.

This approach ensures that while striving for digital inclusivity, there is also a commitment to safeguarding the island's heritage for future generations.

Transparent Justification for Cost Overruns:

By acknowledging the additional financial burdens that CAIs in historical sites and preserved areas bear, the Extremely High Cost Per Location Threshold respects the delicate balance between technological advancement and cultural heritage preservation.

2.4.10 Text Box: Outline a plan for how the Extremely High Cost Per Location Threshold will be utilized in the subgrantee selection process to maximize the use of the best available technology while ensuring that the program can meet the prioritization and scoring requirements set forth in Section IV.B.6.b of the BEAD NOFO. The response must describe:

1. The process for declining a subgrantee proposal that exceeds the threshold where an alternative technology is less expensive.
2. The plan for engaging subgrantees to revise their proposals and ensure locations do not require a subsidy.
3. The process for selecting a proposal that involves a less costly technology and may not meet the definition of Reliable Broadband.

a. Declining High-Cost Proposals in Favor of Cost-Effective Alternatives:

- **Establishment of Thresholds:**
 - Establish clear cost per location thresholds based on comprehensive cost models that take into account Guam's unique terrain and the inclusion of protected areas as CAIs as automatic EHCLs.
 - These models will incorporate both the direct installation costs and additional expenses required for compliance with environmental and historical preservation.
- **Assessment and Comparison:**
 - Evaluate all subgrantee proposals against these thresholds. Proposals exceeding the established limits by a significant margin without a justified reason will be subject to decline.
 - Proposals close to or within the threshold will be compared against alternative technologies that may offer cost savings.

- **Alternative Solutions:**
 - If a less expensive alternative technology is identified that meets the necessary service criteria, the subgrantee will be notified of the discrepancy.
 - Provide the subgrantee with detailed feedback regarding how their proposal exceeds the cost threshold and present the identified alternative.
- **Documentation and Justification:**
 - Require subgrantees to submit a justification for their proposed costs, especially if exceeding thresholds, and to demonstrate why the higher cost is unavoidable and why lower-cost alternatives are not viable.

b. Encouraging Proposal Revisions for Financial Efficiency:

1. **Feedback Loop:**
 - Create a structured feedback mechanism that allows subgrantees to revise their proposals based on the cost thresholds and available technology alternatives.
 - Engage in dialogue to understand the technology choices and explore possible revisions for cost-effectiveness.
- **Consultative Support:**
 - Offer technical and consultative support to help subgrantees align their proposals with financial efficiency and technology optimality.
 - Ensure that the support provided aligns with the overarching goals of serving all locations, prioritizing those underserved or unserved.
- **Revision Incentives:**
 - Introduce incentives for subgrantees to revise their proposals in a manner that reduces costs without compromising service quality, such as expedited review times or additional points in the evaluation process.

c. Selection of Less Costly Technologies When Applicable:

1. **Defining 'Reliable Broadband':**

Clearly define what constitutes 'Reliable Broadband' within the context of Guam's topography and protected status of certain areas, understanding that the standard definition may not be feasible in all cases.
- **Technology Evaluation:**



Implement a tiered technology evaluation system that prioritizes cost efficiency and coverage while remaining flexible on the broadband speed benchmarks when necessary, especially in extreme terrain and protected areas.

- **Justification for Lesser Technologies:**

Develop criteria for selecting a less costly technology that does not fully meet the 'Reliable Broadband' definition but still provides significant service improvements to the most challenging areas to serve.

This selection process must include a robust justification for why the less expensive technology is the most appropriate solution, considering cost, geography, and the needs of the community.

- **Balancing Cost and Benefit:**

Balance the prioritization and scoring requirements with the practicality of serving all areas, including those with extremely high deployment costs due to challenging terrains or protected status.

Ensure the selection process remains transparent, with clear documentation of decisions where less costly technologies are chosen over higher-cost options that exceed the threshold.

Deployment Subgrantee Qualifications

2.4.11 **Text Box:** Describe how the Eligible Entity will ensure prospective subgrantees deploying network facilities meet the minimum qualifications for financial capability as outlined on pages 72 – 73 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to certify that they are qualified to meet the obligations associated with a Project, that prospective subgrantees will have available funds for all project costs that exceed the amount of the grant, and that prospective subgrantees will comply with all Program requirements, including service milestones. To the extent the Eligible Entity disburses funding to subgrantees only upon completion of the associated tasks, the Eligible Entity will require each prospective subgrantee to certify that it has and will continue to have sufficient financial resources to cover its eligible costs for the Project until such time as the Eligible Entity authorizes additional disbursements.

~~a. Detail how the Eligible Entity plans to establish a model letter of credit substantially similar to the model letter of credit established by the FCC in connection with the Rural Digital Opportunity Fund (RDOF).~~

c. Detail how the Eligible Entity will require prospective subgrantees to submit audited financial statements.

d. Detail how the Eligible Entity will require prospective subgrantees to submit business plans and related analyses that substantiate the sustainability of the proposed project.

a. Financial Capability Evaluation

1. **Certifications:**

In certain RFPs, we will require prospective subgrantees to certify their financial qualification to meet project obligations.

Ensure subgrantees can fund project costs exceeding grant amounts and comply with service milestones and all program requirements.

In cases where funds are disbursed post-completion of tasks, subgrantees must also certify they possess sufficient financial resources to cover costs until authorized additional disbursements.

b. Assessing Financial Health

1. **Independent Evaluations:**

Conduct an independent financial assessment to verify the subgrantee's financial health.

Analyze cash flow, capital reserves, and the subgrantee's ability to secure financing or issue public bonds, if applicable.

2. **Financial Stability Metrics:**

Develop a set of financial stability metrics to assess the prospective subgrantee's financial strength. May be developed by a third party.

c. Ensuring Project Viability

1. **Service Milestone Verifications:**

- Regularly verify that subgrantees meet service milestones, which are indicative of their ability to manage and sustain project costs over time.



2. **Risk Management:**
Identify potential financial risks in project proposals and require prospective subgrantees to outline risk mitigation strategies.

d. Documentation and Reporting

1. **Regular Financial Reporting:**
Subgrantees should provide periodic financial reports demonstrating ongoing fiscal responsibility and project cost management.
2. **Audit and Review:**
Plan for regular audits and reviews of the subgrantees' financial management of the project to ensure fiscal accountability.

Additionally, all local procurement laws and those set forth in uniform guidelines not stated here will be closely adhered to.

2.4.11.1 Optional Attachment: As an optional attachment, submit application materials related to the BEAD subgrantee selection process, such as drafts of the Requests for Proposals for deployment projects, and narrative to crosswalk against requirements in the Deployment Subgrantee Qualifications section

N/A

2.4.12 Text Box: Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for managerial capability as outlined on pages 73 – 74 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to submit resumes for key management personnel.
- b. Detail how it will require prospective subgrantees to provide a narrative describing their readiness to manage their proposed project and ongoing services provided.

a. Evaluation of Key Management Personnel

Submission of Resumes and Company Structure:



- Implement a mandatory submission of detailed resumes for all key management personnel. These resumes must outline relevant education, experience, certifications, and a proven track record in managing similar projects or operations.
- Resumes should also highlight any specific expertise in telecommunications or broadband infrastructure deployment.

Review Process:

- Determine with SMEs standards for experience and expertise that key personnel must meet, based on industry best practices and the specific requirements of the BEAD program.

Interviews:

- Conduct interviews with key personnel to gauge their understanding of the project's scope, complexities, and their approach to managing potential challenges.

b. Readiness to Manage Proposed Project

Narrative Description:

- Require a comprehensive narrative from perspective subgrantees describing their readiness to manage the proposed project, including strategies for dealing with anticipated challenges, compliance with regulatory requirements, and maintaining service quality.
- This narrative should demonstrate a clear understanding of the project lifecycle, from initiation through to completion and ongoing operation.

Assessment of Organizational Capacity:

- Develop criteria to assess the organizational capacity of the subgrantee, including financial management systems, customer service protocols, and technical support capabilities.
- Evaluate past performance on similar projects, if available, to establish a track record of successful project management and service provision.

Alignment with BEAD Requirements:

- OIPD will ensure that the narrative aligns with the strategic goals of the BEAD program and adheres to the outlined project management methodologies.

2.4.13 **Text Box:** Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for technical



capability as outlined on page 74 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. a. Detail how the Eligible Entity will require prospective subgrantees to certify that they are technically qualified to complete and operate the Project and that they are capable of carrying out the funded activities in a competent manner, including that they will use an appropriately skilled and credentialed workforce.
- b. b. Detail how the Eligible Entity will require prospective subgrantees to submit a network design, diagram, project costs, build-out timeline and milestones for project implementation, and a capital investment schedule evidencing complete build-out and the initiation of service within four years of the date on which the entity receives the subgrant, all certified by a professional engineer, stating that the proposed network can deliver broadband service that meets the requisite performance requirements to all locations served by the Project.

To ensure prospective subgrantees deploying network facilities meet the minimum qualifications for technical capability as specified by the BEAD NOFO, OIPD will institute a rigorous vetting process:

Technical Qualification Certification:

OIPD will require subgrantees to submit a declaration certifying their technical proficiency in completing and managing their proposed project. This will necessitate a confirmation that the subgrantee has the capability and plans to engage a workforce with the necessary skills and credentials.

Network Design and Documentation Submission:

OIPD will mandate that subgrantees present a detailed network design, supplemented by diagrams, itemized project costs, and a build-out timeline with clear implementation milestones. This must be accompanied by a capital investment plan that validates the project's ability to be fully operational and start service within a four-year period post subgrant award.

These submissions will need to be certified by a professional engineer who will vouch for the proposed network's capacity to deliver the required broadband service to all targeted locations, meeting the stipulated performance standards.

Expert Review Panel:

Upon collection of the submissions, OIPD will assemble a panel of subject matter experts, including network engineers and broadband infrastructure specialists, to



evaluate the proposed plans. This panel will assess the technical feasibility, economic efficiency, and adherence to the program's service benchmarks.

Alignment with Application Materials:

In instances where OIPD provides specific application materials for the BEAD subgrantee selection process, these materials will reiterate and reflect the guidelines established in the NOFO. These materials will guide subgrantees in demonstrating their network planning competence and in certifying their technical capabilities, thus streamlining adherence to the program's timelines and investment requirements.

OIPD's comprehensive evaluation process will ensure that only subgrantees with the requisite technical capacity are approved, fostering the development of a resilient and high-performing broadband infrastructure under the auspices of the BEAD initiative.

2.4.14 Text Box: Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for compliance with applicable laws as outlined on page 74 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the 14 Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to demonstrate that they are capable of carrying out funded activities in a competent manner in compliance with all applicable federal, state, territorial, and local laws.
- b. Detail how the Eligible Entity will require prospective subgrantees to permit workers to create worker-led health and safety committees that management will meet with upon reasonable request.

2.4.15 Text Box: Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for operational capability as outlined on pages 74 – 75 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to certify that they possess the operational capability to qualify to compete and operate the Project.
- b. Detail how the Eligible Entity will require prospective subgrantees to submit a certification that they have provided a voice, broadband, and/or electric transmission or distribution service for at least two (2) consecutive years prior to



the date of their application submission or that they are a wholly owned subsidiary of such an entity and attest to and specify the number of years the prospective subgrantee or its parent company has been operating.

- c. Detail how the Eligible Entity will require prospective subgrantees that have provided a voice and/or broadband service, to certify that it has timely filed Commission Form 477s and the Broadband DATA Act submission, if applicable, as required during this time period, and otherwise has complied with the Commission's rules and regulations.
- d. Detail how the Eligible Entity will require prospective subgrantees that have operated only an electric transmission or distribution service, to submit qualified operating or financial reports, that it has filed with the relevant financial institution for the relevant time period along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution.
- e. In reference to new entrants to the broadband market, detail how the Eligible Entity will require prospective subgrantees to provide evidence sufficient to demonstrate that the newly formed entity has obtained, through internal or external resources, sufficient operational capabilities.

2.4.16 Text Box: Describe how the Eligible Entity will ensure that any prospective subgrantee deploying network facilities meets the minimum qualifications for providing information on ownership as outlined on page 75 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to provide ownership information consistent with the requirements set forth in 47 C.F.R. § 1.2112(a)(1)-(7).

2.4.17 Text Box: Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for providing information on other public funding as outlined on pages 75 – 76 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how it will require prospective subgrantees to disclose for itself and for its affiliates, any application the subgrantee or its affiliates have submitted or plan to submit, and every broadband deployment project that the subgrantee or its affiliates are undertaking or have committed to undertake at the time of the application using public funds.



- b. At a minimum, the Eligible Entity shall require the disclosure, for each broadband deployment project, of: (a) the speed and latency of the broadband service to be provided (as measured and/or reported under the applicable rules), (b) the geographic area to be covered, (c) the number of unserved and underserved locations committed to serve (or, if the commitment is to serve a percentage of locations within the specified geographic area, the relevant percentage), (d) the amount of public funding to be used, (e) the cost of service to the consumer, and (f) the matching commitment, if any, provided by the subgrantee or its affiliates.

2.5 Non-Deployment Subgrantee Selection (Requirement 9)

The Office of Infrastructure Policy and Development (OIPD), Guam Broadband Initiative, and Guam Digital Equity Initiative, are committed to ensuring a fair and transparent process for evaluating grant applications. OIPD welcomes all eligible organizations to submit their grant or subgrantee applications for consideration.

To ensure a fair evaluation process, OIPD requires that all grant applications be submitted in a standardized format, which will be made available on our website. The application should include a detailed project description, budget breakdown, and measurable outcomes. Applicants must also demonstrate a clear understanding of the needs of the community they seek to serve and the ability to implement the proposed project effectively.

To ensure alignment with our mission, OIPD requires that grant applications be scored on their merits of alignment with the Broadband Equity Access and Deployment federal grant. We strongly encourage applicants to review this grant program's eligibility criteria and requirements before submitting their application.

All grant applications will be evaluated by a committee of subject matter experts who will assess each application on its own merits. Applications will be scored based on several factors, including the proposed project's potential impact on the community, the project's feasibility, the applicant's capacity to implement the project successfully, and the alignment with the Broadband Equity Access and Deployment grant program.

OIPD is committed to a fair, objective, and transparent evaluation process. All applicants will receive a notification of the decision on their application, and we welcome any questions or feedback on the evaluation process.

To apply, interested organizations must follow the steps below:

1. Review the grant guidelines and eligibility requirements on the OIPD website.



2. Complete the grant application form and submit all required documentation, including a detailed project proposal and budget plan. Unless otherwise indicated, deadlines will be 5 p.m. (Chamorro Standard Time) of the stated deadline, emailed to broadband@guam.gov in PDF format. Any proposals received after the deadline will not be accepted. An original hard copy and a number of copies to be determined by OIPD must be submitted to the Office within the first 5 days of the deadline.
3. The question and answer period to OIPD will be determined by OIPD, and announced in the published advertisement in a local newspaper of general circulation.
4. Applications will be evaluated and scored based on their alignment with the Broadband Equity, Access, and Deployment (BEAD) federal grant.
5. Finalists will be notified and may be invited to submit additional information or participate in an interview with the OIPD.
6. Grant recipients will be notified and provided with detailed instructions for next steps, including project reporting and compliance requirements.

2.6 Eligible Entity Implementation Activities (Requirement 10)

2.6.1 Text Box: Describe any initiatives the Eligible Entity proposes to implement as the recipient without making a subgrant, and why it proposes that approach.

As the recipient, the Office of Infrastructure Policy and Development (OIPD) intends to implement several key initiatives directly, without the distribution of subgrants. This centralized approach is aimed at ensuring strategic alignment with overarching goals, maintaining quality control, and ensuring the efficient utilization of resources. Here's an overview:

Direct Project Execution and Management:

OIPD will take on crucial projects that necessitate specialized expertise or centralized coordination, such as island-wide network operations and core infrastructure deployments. This direct involvement ensures that projects critical to Guam's connectivity are prioritized and managed to meet the highest standards.

Streamlined Workforce Augmentation:

To address immediate needs and minimize bureaucratic delays, OIPD will directly hire essential personnel. This strategy allows for swift action in critical areas such as project management, technical expertise, and compliance oversight.



Operational Efficiency:

Handling operations in-house ensures that administrative costs are contained and operational efficiencies are realized. This includes the centralization of functions like procurement, financial management, and reporting.

Comprehensive Compliance:

Direct management of compliance responsibilities ensures adherence to all regulatory, environmental, and historical preservation requirements without the added layer of subgrantee oversight.

Programmatic Oversight:

By maintaining control over grant functions such as application processing, monitoring, evaluation, and closeout, OIPD guarantees a consistent and high-quality approach aligned with program objectives.

Administrative Consolidation:

Non-administrative costs such as outreach, education, and training can be more effectively managed and executed under the OIPD's centralized structure, leveraging existing resources for broader impact.

Focused Investments in Staff Training and Development:

Investing in the development of OIPD's internal human resources ensures that staff are well-equipped to handle the complex challenges associated with deploying and managing broadband infrastructure.

Grant Function Enhancements:

The OIPD plans to modernize grant application and management systems to increase transparency, streamline processes, and enhance user experience for all stakeholders involved.

Fiscal Stewardship:

Direct control over funds allows for meticulous financial oversight, ensuring that all expenditures align with the program's objectives and maximize the impact of the investment.

2.7 Labor Standards and Protection (Requirement 11)

2.7.1 Text Box: Describe the specific information that prospective subgrantees will be required to provide in their applications and how the Eligible Entity will weigh that



information in its competitive subgrantee selection processes. Information from prospective subgrantees must demonstrate the following and must include information about contractors and subcontractors:

- i. Prospective subgrantees' record of past compliance with federal labor and employment laws, which:
 - i. Must address information on these entities' compliance with federal labor and employment laws on broadband deployment projects in the last three years;
 - ii. Should include a certification from an Officer/Director-level employee (or equivalent) of the prospective subgrantee evidencing consistent past compliance with federal labor and employment laws by the subgrantee, as well as all contractors and subcontractors; and
 - iii. Should include written confirmation that the prospective subgrantee discloses any instances in which it or its contractors or subcontractors have been found to have violated laws such as the Occupational Safety and Health Act, the Fair Labor Standards Act, or any other applicable labor and employment laws for the preceding three years.
- iv. Prospective subgrantees' plans for ensuring compliance with federal labor and employment laws, which must address the following:
- v. How the prospective subgrantee will ensure compliance in its own labor and employment practices, as well as that of its contractors and subcontractors, including:
 1. Information on applicable wage scales and wage and overtime payment practices for each class of employees expected to be involved directly in the physical construction of the broadband network; and
 2. How the subgrantee will ensure the implementation of workplace safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment projects.

2.7.2 Text Box: Describe in detail whether the Eligible Entity will make mandatory for all subgrantees (including contractors and subcontractors) any of the following and, if required, how it will incorporate them into binding legal commitments in the subgrants it makes:

- A. Using a directly employed workforce, as opposed to a subcontracted workforce;
- B. Paying prevailing wages and benefits to workers, including compliance with Davis-Bacon and Service Contract Act requirements, where applicable, and collecting the required certified payrolls;
- C. Using project labor agreements (i.e., pre-hire collective bargaining agreements between unions and contractors that govern terms and conditions of employment



- for all workers on a construction project);
- D. Use of local hire provisions;
 - E. Commitments to union neutrality;
 - F. Use of labor peace agreements;
 - G. Use of an appropriately skilled workforce (e.g., through Registered Apprenticeships or other joint labor-management training programs that serve all workers, particularly those underrepresented or historically excluded);
 - H. Use of an appropriately credentialed workforce (i.e., satisfying requirements for appropriate and relevant pre-existing occupational training, certification, and licensure); and
 - I. Taking steps to prevent the misclassification of workers.

These requirements will be woven into the subgrants as binding legal commitments to ensure compliance throughout the duration of each project.

Directly Employed Workforce:

OIPD will stipulate that subgrantees prioritize using a directly employed workforce, minimizing reliance on subcontracted labor. This requirement will be outlined in the subgrant agreements and monitored for compliance.

Prevailing Wages and Benefits:

Compliance with the Davis-Bacon Act, Service Contract Act, or local prevailing wage laws will be a condition of all subgrants. Subgrantees will be required to submit certified payroll records regularly to verify compliance.

Project Labor Agreements (PLAs):

When feasible and where it promotes the public interest, OIPD will require the use of PLAs to ensure uniform terms and conditions for all workers on a project.

Local Hire Provisions:

Subgrants will mandate the prioritization of local hiring to boost local employment and economic benefits within Guam.

Union Neutrality:

OIPD will encourage subgrantees to commit to union neutrality, ensuring that workers have the freedom to choose whether to organize and bargain collectively.

Labor Peace Agreements:

To maintain a stable labor environment and prevent disputes, subgrantees will be encouraged to enter into labor peace agreements, especially for larger projects.

Skilled Workforce:

Subgrantees will be required to employ workers from Registered Apprenticeships or other joint labor-management programs, ensuring a skilled workforce that includes representation of underrepresented or historically excluded groups.



Credentialed Workforce:

All workers must meet the standards of necessary occupational training, certification, and licensure. Subgrantees will be required to verify and report the credentials of their workforce.

Preventing Misclassification of Workers:

Steps will be taken to ensure workers are not misclassified as independent contractors when they are indeed employees. Subgrantees will need to follow strict guidelines and reporting measures to prevent misclassification.

To ensure these commitments are adhered to, OIPD will incorporate them into the subgrant agreements and will monitor and enforce compliance through regular reporting, on-site checks, and audits. Failure to adhere to these standards will be met with appropriate actions, including but not limited to withholding of funds or termination of the subgrant.

2.8 Workforce Readiness (Requirement 12)

2.8.1 Text Box: Describe how the Eligible Entity and their subgrantees will advance equitable workforce development and job quality objectives to develop a skilled, diverse workforce. At a minimum, this response must clearly provide each of the following, as outlined on page 59 of the BEAD NOFO:

- a. A description of how the Eligible Entity will ensure that subgrantees support the development and use of a highly skilled workforce capable of carrying out work in a manner that is safe and effective;
- b. A description of how the Eligible Entity will develop and promote sector-based partnerships among employers, education and training providers, the public workforce system, unions and worker organizations, and community-based organizations that provide relevant training and wrap-around services to support workers to access and complete training (such as child care, transportation, mentorship, etc.), to attract, train, retain, or transition to meet local workforce needs and increase high-quality job opportunities;
- c. A description of how the Eligible Entity will plan to create equitable on-ramps into broadband-related jobs, maintain job quality for new and incumbent workers engaged in the sector; and continually engage with labor organizations and community-based organizations to maintain worker voice throughout the planning and implementation process; and
- d. A description of how the Eligible Entity will ensure that the job opportunities created by the BEAD Program and other broadband funding programs are available to a diverse pool of workers.



2.8.2 Text Box: Describe the information that will be required of prospective subgrantees to demonstrate a plan for ensuring that the project workforce (including contractors and subcontractors) will be an appropriately skilled and credentialed workforce. These plans should include the following:

- a. The ways in which the prospective subgrantee will ensure the use of an appropriately skilled workforce, e.g., through Registered Apprenticeships or other joint labor-management training programs that serve all workers;
- b. The steps that will be taken to ensure that all members of the project workforce will have appropriate credentials, e.g., appropriate and relevant pre-existing occupational training, certification, and licensure;
- c. Whether the workforce is unionized;
- d. Whether the workforce will be directly employed or whether work will be performed by a subcontracted workforce; and
- e. The entities that the proposed subgrantee plans to contract and subcontract with in carrying out the proposed work.

If the project workforce or any subgrantees, contractor's, or subcontractor's workforce is not unionized, the subgrantee must also provide with respect to the non-union workforce:

- a. The job titles and size of the workforce (FTE positions, including for contractors and subcontractors) required to carry out the proposed work over the course of the project and the entity that will employ each portion of the workforce;
- b. For each job title required to carry out the proposed work (including contractors and subcontractors), a description of Safety training, certification, and/or licensure requirements (e.g., OSHA 10, OSHA 30, confined space, traffic control, or other training as relevant depending on title and work), including whether there is a robust in-house training program with established requirements tied to certifications, titles; and
- c. Information on the professional certifications and/or in-house training in place to ensure that deployment is done at a high standard.

2.9 Minority Business Enterprises (MBEs)/ Women's Business Enterprises (WBEs)/ Labor Surplus Firms Inclusion (Requirement 13) 19

Guam is home to one of America's most diverse populations. In order to achieve digital equity for these groups, it is crucial to work closely with various community organizations that represent different racial and ethnic groups. The following list details examples of potential digital equity initiatives for a selection of these organizations (Guam has many more beyond this list), focusing on harnessing the potential of digital



tools and broadband access to further each group's specific mission and needs. Please note that these examples are hypothetical only, and are intended to communicate the direction in which the program intends to deliver services.

1. Developing a digital marketplace for CHamoru businesses, encouraging economic development within the community and enhancing the digital literacy of CHamoru entrepreneurs geared towards the preservation of Guam's unique CHamoru language and culture.
2. Guam Filipino Organizations: Promoting digital literacy among Filipino entrepreneurs and developing an online platform for Filipino-owned businesses to boost their visibility and access to the broader Guam market.
3. Guam Chuukese Community: Implementing a digital education program focused on enhancing the employability of the Chuukese community, including language software for English learners and digital job placement assistance.
4. Developing a virtual wellness hub tailored to Micronesian women, offering resources such as online health education and counseling services, and forums to encourage peer support and connection.
5. Guam Community College: Initiating a mentorship program leveraging video conferencing tools to connect All Study Abroad (API) internship students with successful alumni and professionals within their fields of study.
6. Guam Council on the Arts and Humanities: Establishing an online platform showcasing art from minority and underserved communities, alongside tutorials and workshops in digital arts, enabling wider reach for artists and fostering new digital skills.
7. Guam Women's Organizations: Leveraging digital platforms to deliver leadership and economic empowerment programs, facilitating access to online resources and support networks for women from diverse backgrounds.
8. Implementing an online cultural exchange program that encourages interaction and understanding among different cultures on Guam, using multimedia resources and interactive platforms.
9. Establishing a digital resource center providing educational and employment services for the Micronesian community, including online courses and job boards specifically curated for their needs.

As can be seen, each of these potential projects represents a unique opportunity to promote digital equity within Guam's diverse racial and ethnic communities. By collaborating with these representative organizations and groups and tailoring initiatives to meet the specific needs of each, the team will play a pivotal role in ensuring every individual in Guam has the opportunity to reap the benefits of global digital societies and economies.



2.9.2 Check Box:

Certify that the Eligible Entity will take all necessary affirmative steps to ensure minority businesses, women's business enterprises, and labor surplus area firms are used when possible, including the following outlined on pages 88 – 89 of the BEAD NOFO:

- a. Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
- b. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
- c. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
- d. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
- e. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
- f. Requiring subgrantees to take the affirmative steps listed above as it relates to subcontractors.

2.10 Cost and Barrier Reduction (Requirement 14)

Our approach to enhancing Guam's digital infrastructure is practical and grounded in existing assets. We already have substantial resources, from fiber to facilities.

These aren't just idle assets; they're possible parts of improving broadband access and performance across the island. What's been missing is the targeted funding to bring these pieces together cohesively.

That's where BEAD funding comes in. This financial boost enables us to unlock the full potential of our existing private, or yet-to-be-built infrastructure, offering a more immediate and cost-effective path to improved broadband services. This isn't about starting anew; it's about making smart, strategic investments that activate the value of what we already have.

BEAD funding can supplement private-sector efforts and partnering on open use agreements with agencies who have buried fiber, right of way, and existing conduit and other systems.

Interconnection:



The interconnection infrastructure should be typhoon-proof and buried, featuring diverse connections to all submarine cable stations with managed capacity and extensive on-net connections to government offices and commercial buildings.

Power and Electricity:

The projects could include sufficient land area for a 5MW to 10MW solar farm, optimized other available building rooftops for solar panel density, available land, leased power facilities and savings on power costs shared with Carrier data centers deemed ‘critical infrastructure,’ ensuring uptime, operational expense and resiliency.

Attracting CDNs and Content Providers to “Bring the Internet” to Guam

Guam's unique geographic position, bridging Asia and North America, presents a compelling proposition for Content Delivery Networks (CDNs) seeking faster content delivery to major markets. By hosting CDNs in a unified infrastructure ring of private Tier 3 data centers, Guam promises reduced latency and a superior user experience to a vast audience. What sets these data centers apart are hardened structures, built resiliently against natural disasters such as typhoons. Such a fortified foundation assures CDNs of unparalleled reliability and continuous uptime, a factor paramount in their selection criteria. Furthermore, in today's era of environmental consciousness, the green initiatives of the data center act as a significant draw. Employing sustainable practices, the data center ensures cost-effective operations through renewable energy and supports corporate sustainability goals, a factor increasingly significant for global companies. The promise of 99.995% uptime, further underscores the center's commitment to excellence.

Beyond infrastructure, if Guam's government offers incentives, it can greatly amplify the region's attractiveness. Moreover, the promise of robust connectivity, ensured by high-capacity submarine cables, makes a compelling case for CDNs to choose Guam as their hub. The island's emphasis on fostering a tech-savvy local workforce assures that the center's operations will be seamless and forward-looking. From a financial perspective, competitive pricing models can draw CDN providers, especially during the facility's initial phases. Collaborative opportunities with local educational institutions and tech incubators can spark innovation, providing CDNs with an environment ripe for growth and research. Through dedicated marketing campaigns that underscore Guam's unique benefits, complemented by testimonials and data-driven results, the island can successfully position itself in this region of the world, as a strategic, sustainable, and resilient hub, tailor-made for the future needs of CDNs.



Channeling traffic through MARIIX to position Guam as a Major Data Hub for US-Based CDNs

Introduction

The carrier-neutral Mariana Islands Internet Exchange (MARIIX) is poised to be crucial in reducing latency and improving internet connectivity in Guam through peering agreements. A comprehensive plan will be developed to attract major and minor Content Delivery Networks (CDNs) and local Internet Service Providers (ISPs) by enhancing infrastructure, offering incentives, and employing strategic marketing.

MARIIX is a project operated, hosted, and partially funded by the University of Guam's Office of Information Technology (OIT). The purpose of MARIIX is to allow local Internet Service Providers (ISPs) in Guam to inter-connect without sending traffic destined for each other's networks through international links. The MARIIX network operates independently of all other networks and serves only as a means of connection among ISPs and CDNs that choose to peer at MARIIX. An advantage and benefit of MARIIX is that it is a neutral exchange for any service provider in a neutral datacenter.

Currently, the server equipment that hosts these MARIIX services is over 10 years old and is no longer supported by manufacturer updates. Updating server hardware is critical to ensuring that services remain current and are not susceptible to cybersecurity vulnerabilities.

By strengthening the research network, Guam Open Research and Education eXchange (GOREX), and the neutral Internet Exchange, MARIIX, Guam can create a robust core infrastructure across multiple sectors.

Regardless of the Data Center solutions to improve latency, to truly bring the US Internet to the Marianas, the data centers must attract Major CDNs such as AWS, Cloudfront, GovCloud, Cachefly, Google, and Akamai and other CDNs that do more than serve entertainment content.

About MARIIX

The Mariana Islands Internet Exchange, or MARIIX, is a project operated, hosted and partially funded by the University of Guam's Office of Information Technology (OIT). The purpose of MARIIX is to allow local Internet Service Providers (ISPs) on Guam to inter-connect without sending traffic destined for each other's networks through international links. The MARIIX network operates independently of all other networks,



and serves only as a means of connection among ISPs and CDNs that choose to peer at MARIIX.

The University of Guam collaborated with the Network Startup Resource Center (NSRC) in April of 2018 to create MARIIX. The NSRC donated two network switches that would serve as the base infrastructure for the Internet Exchange point. The end result of the NSRC DEA was the creation of Guam's very first carrier-neutral, open, commercial internet exchange: the Mariana Islands Internet Exchange (MARIIX).

Regardless of approach, a neutral exchange and upgraded data center at the University of Guam has myriad benefits.

A. Islandwide Middle-Mile Architecture

We propose a strategic blueprint to advance Guam's broadband infrastructure over the next five years, with a definitive aim to construct a robust middle-mile network that guarantees extensive coverage and resilience, especially surrounding key community anchor institutions. This plan stresses the importance of practical implementation, urging for an expedited improvement of the existing broadband frameworks. It calls for leveraging current assets, engaging with local stakeholders for tailored solutions, and prioritizing areas with critical needs. Additionally, the blueprint should include measurable goals, timelines for deployment, and a clear funding model to ensure the execution is as efficient as it is strategic.

The Government of Guam has no ambitions of becoming an Internet Service Provider (ISP). It must also ensure sustainability of BEAD-funded initiatives. Importantly, the plan articulates a preference for private-sector expertise and resources, acknowledging the benefits that such partnerships can bring. However, this does not preclude public institutions from participating; all qualified bidders will be welcomed to ensure the widest range of innovative solutions and competitive pricing, reinforcing the plan's commitment to a collaborative and inclusive approach to Guam's digital advancement.

The devastation to islandwide broadband services wrought by Typhoon Mawar, which hit the island in May 2023, brought into sharp focus the necessity for a robust, improved communication infrastructure in Guam. Post-typhoon, a large segment of the island found itself cut off from both internet and wireless services. This absence of connectivity didn't just isolate residents from each other, but also hindered multiple government entities' access to crucial emergency data and resources.

The post-disaster recovery phase presented numerous challenges that affected various carriers' abilities to rapidly restore services. In the immediate aftermath, prioritization was essential, and carriers worked diligently to ensure that critical government communications were reinstated as a priority. This necessary focus on essential services meant that restoring broader community connectivity took additional time. The situation highlighted the collective need for an enhanced and more agile communication infrastructure that can provide both vital public service support and community connectivity in times of crisis. Moving forward, it is important to work collaboratively with all stakeholders, including the Federal Communications Commission (FCC), to ensure timely updates and efficient recovery strategies to better serve all residents in future emergencies.

Typhoon Mawar also revealed the vulnerabilities in the existing current technology infrastructure for internet services. Restoration has been highly inconsistent, with residents facing delays from days to weeks, and even up to six months, highlighting the inadequacy of the aging and vulnerable systems in place. As of this writing, (November 2023), many residents still remain without restored home internet. It would be irresponsible not to use funds to augment these existing systems with new infrastructure running in parallel or replacing part of it with areas with new open-access and carrier neutral segments. Doing so would not only expedite the restoration process in the aftermath of such disasters, but also create a more resilient network necessary to achieve internet for all.

In event of an emergency, our goals include:

- 1. Centralized Decision-making:** A single, unified body overseeing the infrastructure could act swiftly, avoiding bureaucratic lags typical of multiple, disjointed entities. Immediate resource allocation or communication channel rerouting would streamline the post-disaster response.
- 2. Uniform Hardening Measures:** Consistent standards across all infrastructure components would mean all areas, irrespective of profitability or population density, would benefit from the same level of resilience.
- 3. Focused Investments:** Funding a more robust private infrastructure would funnel investments into technologies and strategies explicitly aimed at withstanding typhoon-level disruptions instead of splitting priorities with profit-driven endeavors.



4. Wider Coverage: Ensuring even the remotest parts of Guam remain connected, especially during emergencies, would be a primary goal, bridging the communication gaps recently observed.

5. Integrated Response: A seamless integration with emergency services could facilitate faster evacuations, provide immediate medical assistance, and ensure residents receive crucial information in a timely manner.

6. Backup Systems: With redundant communication pathways and multiple backup power sources, the chances of complete outages, as witnessed recently, would significantly diminish.

7. Community Engagement: Direct communication with residents about infrastructure status, combined with preparedness drills, can ensure communities are better equipped to deal with emergencies, before, during and after.

8. Maintenance and Upgrades: Regular checks and updates would ensure the infrastructure remains in peak condition, reducing the likelihood of breakdowns during crucial times.

9. Transparent Reporting: With a mandate for clarity, residents would be updated more consistently and promptly about the state of communications, fostering trust in its government.

10. Dedicated Resources for Emergency: Quick-response teams, well-equipped and trained, would be ready for deployment, ensuring rapid restoration of services and reducing reliance on carriers to report status updates.

11. Facilitating the Mandatory Response Initiative: The Federal Communications Commission mandates that the carriers assist in connectivity for their customers during network outages, when possible. Additionally, it calls for them to form mutual aid agreements to share physical resources and collaborate during emergencies. They are required to enhance local government readiness for disasters, boost consumer preparedness, and improve public awareness and communication about restoration times. A public middle-mile network of towers, wireless, and fiber throughout the island could fill the gaps which may prevent this from happening during disasters, as it did during Typhoon Mawar.

12. Open Access: All providers will use this network without preference at reasonable wholesale prices. These prices are reduced from retail rates because the subgrantee doesn't have the costs associated with directly serving end users, like marketing and billing.

This obligation also requires carriers to offer an affordable middle-cost standard, as detailed in another section of this plan, which must meet the criteria specified in the Bipartisan Infrastructure Law.

In light of recent events, a shift towards a unified, hardened, and resilient communications infrastructure isn't just a matter of efficiency—it's a necessity for the safety and well-being of Guam's residents.

2.11 Climate Assessment (Requirement 15)

Guam's older legacy communication systems face more extreme climate threats today than in their history. Especially given the dire situation presented by Typhoon Mawar in May 2023, which while devastating, was not the worst-case Guam has or will experience. These vulnerabilities can further amplify the already considerable impact on tourism and the broader economy.

1. **Susceptibility to Natural Disasters:** Older communication systems may not have the built-in resiliency that modern networks have. The destruction caused by typhoons can bring down these systems completely, as we saw with Typhoon Mawar, disrupting emergency services and creating a communications blackout that can deter tourists for extended periods.

2. **Decay and Deterioration:** Climatic conditions like heat, humidity, and saltwater can accelerate the wear and tear on older systems. The rising instances of extreme weather can quicken their decay, causing frequent downtimes and unreliable services. Tourists might not be willing to compromise their safety by visiting an area with unreliable communication systems.

3. **Limited Scalability:** As tourism is a significant economic driver, the communication system should be scalable to accommodate the demands of peak seasons. Older systems are often not scalable and may crash due to heavy usage, affecting businesses reliant on stable communication networks.

4. **Outdated Security Measures:** Cyber threats are more significant during times of natural disasters, and older systems may not have the latest security measures in place. This makes them vulnerable to cyberattacks, which could lead to further loss of confidence among tourists and residents alike.



5. **Cost of Upkeep:** Maintaining and repairing older systems can be resource-intensive, drawing away much-needed funds that could be allocated for climate-resilient infrastructure. This indirect cost can hamper other efforts to safeguard tourism and the broader economy.

6. **Incompatibility with Modern Tech:** As the world moves towards 5G and other high-speed, reliable communication systems, older tech becomes increasingly incompatible. This can prevent the implementation of new, more resilient systems that could protect the economy during extreme climate events.

7. **Dependency Risks:** Many service providers, including those in the tourism sector, might still rely on these older systems. Should these legacy systems fail, the impact would ripple across various sectors, from travel arrangements and hotel bookings to emergency services, tarnishing Guam's reputation as a reliable tourist destination.

8. **Economic Ripple Effect:** Just as with natural disasters, the failure of a communication system has a multiplier effect. The service sector, particularly tourism, would be hit hard, leading to job losses and an overall decline in economic activity.

Given these vulnerabilities, the urgency to update and fortify Guam's communication infrastructure can't be overstated. In the era of climate change, relying on older, less resilient technologies is a gamble that places both the tourism sector and broader community at risk.

a. Identify the geographic areas that should be subject to an initial hazard screening for current and projected future weather and climate-related risks and the time scales for performing such screenings;

The Office of Infrastructure and Policy Development (OIPD) will prioritize geographic areas in Guam for initial hazard screening based on their vulnerability to typhoons, as well as other weather-related events such as heavy rainfall and flooding, which are common in the region.

b. Characterize which projected weather and climate hazards may be most important to account for and respond to in these areas and over the relevant time horizons;

For Guam, the most significant weather and climate hazards to account for include the increasing intensity and frequency of typhoons, storm surges, and associated flooding. Other factors, such as extreme rainfall events leading to landslides and erosion, will also be critical to consider.

c. Characterize any weather and climate risks to new infrastructure deployed using BEAD Program funds for the 20 years following deployment;

Infrastructure deployed with BEAD Program funds in Guam will face particular long-term risks from the aforementioned weather and climate hazards. OIPD seeks expertise in assessing the robustness of new infrastructure against prolonged exposure to high winds, saltwater intrusion, and potential for flooding. The assessment will look 20 years into the future, considering both the expected physical wear-and-tear and the adaptability of the infrastructure to climate change impacts over its operational life.

d. Identify how the proposed plan will avoid and/or mitigate weather and climate risks identified; and

To mitigate these risks, OIPD's plan will require subgrantees to adhere to building codes and standards that require typhoon-resistant design for new infrastructure. This may involve using materials rated for high winds, elevated platforms for equipment in flood-prone areas, and designing redundant systems to ensure connectivity during and after typhoon events. Green infrastructure solutions, such as natural buffers, may be utilized to reduce erosion and flooding impacts. In addition, proactive disaster response planning, including pre-deployment of emergency repair resources and clear procedures for rapid post-typhoon assessment and repair, will be critical components of the strategy.

e. Describe plans for periodically repeating this process over the life of the Program to ensure that evolving risks are understood, characterized, and addressed, and that the most up-to-date tools and information resources are utilized.

We will ensure that these are part of the responsibility of any subgrantee who may be affected by environmental changes and hazards for a period of time up to 10 years.

2.11.1.1 Optional Attachment: As an optional attachment, submit any relevant reports conducted within the past five years that may be relevant for this requirement and will be referenced in the text narrative above.

PACIFIC ISLANDS REGIONAL CLIMATE ASSESSMENT (PIRCA)

Climate Change in Guam: Indicators and Considerations for Key Sectors

<https://www.eastwestcenter.org/sites/default/files/private/climate-change-in-guam-pirca-2020-low-res.pdf>



2.12 Low-Cost Broadband Service Option (Requirement 16)

The Bipartisan Infrastructure Law requires Guam craft Guam an Affordable Broadband Initiative that is designed to align with the BEAD program’s low-cost option guidelines. We propose:

1. Pricing Structure:

The pricing is set at \$60 per month for those who qualify under the ACP criteria, ensuring affordability. With ACP benefit, the total monthly cost to the customer would be \$30. If the ACP is discontinued, the price adjusts to \$50, remaining within a range that could be considered low-cost under BEAD's guidelines.

2. Eligibility Verification:

Adhering to the ACP eligibility criteria, a benefit aware agency can handle local verification, which is a critical component of the BEAD low-cost option requirement.

3. Broadband Service Standards:

Offers speeds matching the BEAD program’s minimum service standards of 100/20 Mbps, thereby ensuring the service is not only affordable but also robust enough for modern applications.

4. Adaptability and Flexibility:

The program includes stipulations for service continuity and upgrades, which are elements that can be critical in meeting BEAD guidelines that focus on the long-term sustainability and adaptability of low-cost options.

5. Consumer Protections:

Ensures that eligible subscribers are protected from unexpected price hikes, which is in line with BEAD’s intention to establish reliable and predictable low-cost options for consumers.

6. Local Engagement:

The local verification and management of the program empower the community, a factor that the BEAD program encourages in order to ensure the low-cost option is effectively meeting the needs of the targeted population.

7. Proactive Outreach:

Commitment to community education and outreach aligns with BEAD’s emphasis on increasing the adoption of broadband services by ensuring that communities are aware of and understand how to access affordable services.



8. Post-ACP Scenario Planning:

Preparation for a potential discontinuation of ACP demonstrates foresight in planning, a characteristic BEAD would support to maintain continuous service without federal subsidy support.

As reliability is a BIL requirement, we propose the following Carrier Service Reliability Standard:

1. **Annual Downtime Threshold:** Carriers shall commit to an operational standard wherein the network infrastructure is designed to provide broadband services with a downtime not exceeding 2% in any given calendar year.
2. **Measurement of Downtime:** Downtime is defined as periods during which the network is not operational and available to consumers, excluding scheduled maintenance windows clearly communicated to customers in advance.
3. **Monitoring:** Continuous monitoring systems must be implemented to promptly detect, report, and respond to service disruptions. Carriers are required to maintain logs and present an annual report of network uptime and downtime.
4. **Response and Rectification:** In the event of service disruptions contributing to downtime, carriers must initiate immediate remediation efforts. An action plan should be provided for any outage lasting beyond two hours, detailing steps for service restoration and communication with affected consumers.
5. **Transparency:** Carriers will offer consumers clear and accessible reports on network performance, including uptime statistics, via customer portals or upon request.
6. **Continuous Improvement:** Carriers shall engage in ongoing investment and infrastructure enhancement initiatives to mitigate downtime and elevate service reliability.
7. **Customer Compensation:** In cases where downtime exceeds the 2% threshold, carriers must implement a customer compensation policy that may include service credits or other forms of restitution.



Carrier Service Reliability Standard Addendum

In recognition of the unique challenges posed by natural disasters, the following clause is appended to the Carrier Service Reliability Standard:

Natural Disaster Consideration:

Recognizing that natural disasters can cause unforeseeable service interruptions, carriers will be afforded a grace increase in the acceptable annual downtime threshold, from 2% to 2.5%, exclusively in the wake of such events. This extension applies to disruptions directly resulting from the natural disaster and for a duration specified in disaster response protocols.

a. Disaster Response Protocols: The carrier must activate a disaster response protocol immediately following a natural disaster, aimed at restoring service as swiftly as possible while ensuring the safety of personnel and the public.

b. Documentation and Reporting: Carriers are required to document the impact of the natural disaster on service delivery and report this to the relevant oversight bodies within an established timeframe.

c. Consumer Communication: Transparent and timely communication with consumers is mandatory during and after the disaster, providing updates on service restoration efforts and anticipated timelines.

d. Review and Adjustments: Post-disaster, carriers will cooperate with regulatory bodies to review the impact on network downtime. Adjustments to the increased downtime allowance will be made based on the scale, severity, and duration of the natural disaster's impact.

- Certify that all subgrantees will be required to participate in the Affordable Connectivity Program or any successor program.

2.13 Middle-Class Affordability Plans

Setting a standard for Guam's carriers to provide commercial speeds at 100 Mbps download/20 Mbps upload without data caps and a straightforward price of \$75 is not just beneficial, but necessary in the mission for internet for all. In meeting global standards, 100/20 Mbps is considered a low



benchmark in much of the developed world. Guam shouldn't just aim to meet this but must be equipped to surpass it to stay relevant and competitive. Even now, the FCC is considering moving to a gigabit standard, further leaving Guam in jeopardy of being left behind. ³

History has shown that carriers are resilient and are more than capable of modifying pricing structures for higher speeds or introducing other value propositions to entice subscribers. It's not about making sacrifices but thoughtful, consumer-centric adjustments.

For a household on a modest budget, a consistent price of \$75 ensures predictability, fostering trust with consumers and aiding in household budgeting. If we set this standard today, Guam will remain prepared for the inevitable digital advancements of tomorrow.

Data caps should also be prohibited. Unlimited internet access is a cornerstone for innovation, remote work, and educational opportunities, which collectively elevate the potential of Guam's residents.

If prices stay as they are, consumers might gravitate to pre-paid plans, turning essential internet access into a weekly choice against other essentials— the broadband version of living paycheck-to-paycheck. Thus, constantly living under the threat of running out of data at any moment.

As stated in the BIL⁴, “The Infrastructure Act’s BEAD provisions are premised on Congress’s determination that “[a]ccess to affordable, reliable, high-speed broadband is essential to full participation in modern life in the United States,” and that “[t]he persistent ‘digital divide’ in the United States is a barrier to” the nation’s “economic competitiveness [and the] equitable distribution of essential public services, including health care and education.” Accordingly, each Eligible Entity must include in its Initial and Final Proposals a middle-class affordability plan to ensure that all consumers have access to affordable high-speed internet.

In addition, carriers that can offer lower costs will receive more consideration during the subgrant process.

³ <https://www.fiercetelecom.com/broadband/fcc-seeks-input-upgrading-national-broadband-speeds>

⁴ Infrastructure Act § 60101.



In setting this standard, Guam not only aligns with global benchmarks but also sends a clear message about its commitment to fostering a digital environment that is both progressive and consumer-focused.

2.14 Funding Request use of Funds (Requirement 17)

2.14.1 Describe the Eligible Entity’s planned use of any funds being requested, which must address the following:

Guam will need a comprehensive blend of technical, strategic, and administrative support. Below is a concise overview of what’s needed in the initial release of funds.

1. Technical Expertise:

Broadband Infrastructure Assessment: An evaluation of Guam's current broadband landscape to pinpoint areas for enhancement and growth.

Network Design & Optimization: Guidance to architect an efficient network tailored to Guam's unique geographical and infrastructural challenges.

Speed and Latency Solutions: Tools and knowledge to optimize internet speed, considering Guam's location and latency challenges.

Cybersecurity Protocols: Ensuring that Guam's digital infrastructure meets top-tier security standards.

2. Personnel:

For example, while a minimal staff may suffice during the planning phase to create budget estimates, assist in the creation of plans and timelines, execute communication, perform GIS mapping, and more—the implementation phase will require more financial support to manage disbursements, monitor expenditures, ensure compliance, and handle procurement. Similarly, while initial outreach may involve drafting a communications plan, the implementation stage demands personnel to actually execute that plan: running campaigns, engaging with the community, analyzing feedback, and adapting strategies accordingly.

By having more staff during implementation, a project can maintain its quality, meet timelines, and adhere to its budget, while also effectively responding to any unexpected challenges or opportunities that arise. This isn't simply a matter of scaling up; it's about adding the specialized skills needed to bring a well-planned project to successful fruition.



3. Support of the Data Centers, Last-Mile Deployment for Unserved, Underserved, easing clearances, assessment, etc.

The Broadband Equity, Access, and Deployment (BEAD) program provides a significant opportunity for Guam to enhance broadband access across the island. Understanding that a large portion of the funds will be allocated for defining project areas, last-mile deployment, and enhancing private data centers, here's how these aspects can be approached:

Defining Project Areas:

BEAD funds will be crucial in identifying and mapping out specific project areas that require broadband enhancement. This process involves in-depth research and data analysis to determine where the digital divide is most acute. These funds can support the necessary surveying, mapping technologies, and expert consultations required to delineate these project areas accurately.

Last-Mile Deployment:

The funds allocated for last-mile deployment will facilitate the direct connection of broadband services to homes, businesses, and anchor institutions. This deployment can include:

- Expanding fiber-optic networks to reach remote and underserved areas.
- Installing necessary infrastructure such as conduits, cables, and service drops.
- Subsidizing the construction costs for ISPs willing to expand services into less profitable areas.
- Supporting the installation of wireless networks where terrestrial broadband deployment is not feasible due to Guam's unique terrain and protected areas.

Enhancing Private Data Centers:

By utilizing BEAD funds to enhance private data centers, Guam can ensure these critical infrastructures are capable of handling increased data demands and are resilient against climate threats. Enhancements may include:

- Upgrading existing facilities to support higher data capacities and more advanced technologies.
- Implementing robust cybersecurity measures to protect against digital



threats.

- Improving physical infrastructure to withstand severe weather conditions and natural disasters.
- Supporting renewable energy sources and green technologies to reduce operational costs and align with sustainability goals.

Synergy with Private Sector:

Engaging the private sector through incentives or partnerships to utilize Guam's existing infrastructure optimally will be key. The approach would aim to:

- Encourage ISPs to leverage existing public infrastructure for last-mile connectivity to avoid duplication and reduce costs.
- Foster collaborations where private data centers can complement public infrastructure, thus enhancing the overall network without direct competition.
- Ensure that private sector expertise is harnessed in the execution of these projects, providing a boost to the local economy.

4. Standing up a workforce:

Guam is meeting with several entities in order to determine workforce plans. An RFI issued in late 2023 continues to draw ideas and attention from organizations willing to work within federal guidelines alongside the Guam Department of Labor. Some may focus on training from high school through a two-year certification, others are looking at ant satisfaction, and industry demand. Feedback from employers, participants, and program graduates will be incorporated to continuously improve the GWEP.

Conclusion

The Guam Workforce Empowerment Program (GWEP) aims to revolutionize workforce development in Guam by leveraging the resources of Guam Community College Bootcamp, the University of Guam's coursework, certificates and on-the-job training, and others are focused on working for specific causes, such as rehabilitation of veterans and others.

Example: Guam Workforce Empowerment Program

The Guam Workforce Empowerment Program (GWEP) is a comprehensive



workforce development initiative designed to bridge the skills gap, empower, and advance the local workforce in Guam. This program incorporates the Guam Community College Bootcamp with the University of Guam computer science and cybersecurity courses, programs, and faculty, leveraging funding from the Broadband, Equity, and Access Deployment (BEAD) program through the Guam Office of Infrastructure Policy and Development. By collaborating with key stakeholders, GWEP aims to provide accessible and effective training opportunities, foster economic growth, and sustain development in the region.

Program Objectives

Skill Enhancement: Equip participants with in-demand skills and knowledge through specialized training programs, at various educational levels ranging from short-term entry level courses to certificates and degrees, that align with the evolving job market.

Employment Placement: Facilitate job placement opportunities by collaborating with local industries and employers, including local, regional, and federal government employers.

Career Advancement: Offer pathways for continuous skill and knowledge development and enhancement, and career growth to reinforce long-term employability.

Community Engagement: Engage with island communities to understand their needs, encourage participation, and promote inclusivity in the workforce.

Components of the GWEP:

Guam Community College Bootcamp

GWEP will collaborate with Guam Community College (GCC) to expand and strengthen its existing Bootcamp programs. These boot camps will focus on high-demand industries, such as information technology, healthcare, hospitality, construction, renewable energy, telecommunications, network engineering, and network architecture.

University of Guam Workforce and Career Development in Cybersecurity, Computer Science, and Data Science

The University of Guam will offer undergraduate and graduate coursework, certification, and degrees that will build upon GCC's bootcamp training, as well as other private and public-sector training and education, that will increase the skill level and areas of expertise for advanced level positions by



providing a range of basic to specialized courses. Basic courses include introduction to computer science, Java I, Python I, HTML, CSS, and JavaScript. Fundamental courses include software engineering, data structure, and Algorithm, Python II, Linux, Java II, and Discrete Structure. Specialized course content includes network security, cloud computing, wireless and wired networks, network programming, Machine Learning/AI, web development, computer system defense, etc.

UOG will also leverage existing programs such as the NASA-funded UOG's Drone Corps that can map and monitor the island's broadband infrastructure. Existing geographic information system (GIS) faculty within UOG can also use their GIS expertise to train new professionals in GIS technology.

Curriculum Development

UOG and GCC, in partnership with industry experts, partner higher-education institutions, and support from the Guam Economic Development Authority (GEDA), will design and develop specialized curricula tailored to meet the demands of targeted employment sectors.

The curriculum will emphasize hands-on training, practical experience, and emerging technologies in the professional development format. The curriculum provided by UOG will enable participants to identify and address cyber threats, perform data analytics and exchange, and deploy GIS services to support the investment in Guam's broadband infrastructure. Once the curriculum is in place, UOG will pursue designation as a National Security Agency Center for "Academic Excellence in Cyber Defense." The GWEP will provide funding to hire additional faculty and staff to develop and implement courses and new curriculum.

Additionally, UOG's Global Learning and Engagement unit (GLE) will offer refresher courses to enhance, upgrade, and update the existing technology workforce in local, federal, and private sectors.

In short, the entire scope of workforce development, from bootcamp to the development of technical leadership, will be encompassed within the GWEP framework.

Scholarships and Tuition Assistance

The GWEP, with funding from the BEAD program, will offer funding, scholarships and tuition assistance to eligible participants to reduce



financial barriers and make the GCC bootcamps and UOG's coursework, programs, and certificates, more accessible to individuals from diverse socio-economic backgrounds.

Industry Partnerships

GWEP will foster partnerships with local industries and businesses, facilitated by OIPD, to create a direct link between training and employment. These partnerships will lead to internships, apprenticeships, and job placement opportunities for graduates of the bootcamps and UOG coursework, certificates, and programs. Participants can continue to enhance skills and knowledge development through higher level UOG courses, including a master's program in "Statistics and Data Science". UOG plans to develop coursework in Machine Learning/AI which will benefit GWEP participants who seek to learn emerging technologies and their application to Guam's broadband infrastructure.

Career Counseling and Mentoring

Professional career counselors and professional and faculty mentors,, will guide participants through the program, providing guidance on career paths, personal development, and job search strategies.

Soft Skills Training

In addition to technical skills, the program will offer critical thinking skills, soft skills training, including communication, teamwork, problem-solving, staff leadership, and time management, to enhance overall employability.

Online Learning Platform

GWEP will utilize and strengthen the University of Guam's online learning platform to offer flexible and self-paced training options for participants who may have scheduling constraints or prefer remote learning. UOG's Center for Online Learning provides technical support for UOG's online environment. Each semester, over 100 UOG courses use the Learning Management System platform, Moodle, to deliver online content and engagement activities to ensure learning outcomes. This Learning Management System (LMS) can be strengthened to support GWEP and GEDA's High Tech Park initiatives.

Strengthening the Existing Network

UOG hosts the GOREX network and the neutral internet exchange MARIIX network. With support from GWEP, UOG will connect all educational institutions on the island. This will improve access to resources including speed, educational platforms, and



learning management systems.

Strengthening Guam's regional partnerships with CNMI's Northern Marianas College is also a desired outcome.

Ongoing Support and Alumni Network:

GWEP will establish an alumni network to provide ongoing support, networking opportunities, and access to continued learning resources for program graduates.

Funding

The funding for the Guam Workforce Empowerment Program (GWEP) will be sourced from the Broadband, Equity, and Access Deployment (BEAD) program, administered by relevant government agencies.

Evaluation and Monitoring

Regular evaluations will be conducted to assess the program's effectiveness, job placement rates and participants, with funding from the Broadband, Equity, and Access Deployment (BEAD) program. Through this collaborative effort, GWEP will empower the local workforce, boost employment opportunities, and contribute to the sustainable economic growth of Guam and the region, while bridging the digital divide and promoting equitable access to opportunities

5. Enabling a low-cost solution which includes free access for all.

Non-Deployment: Free Islandwide Wireless Internet Access

The Port Authority of Guam, as a pivotal Community Anchor Institution, envisions leveraging strategic investments to provide broadband access to nearby coastal villages. Exploring avenues for public-private collaboration, we are committed to enhancing our current infrastructure, which could serve as the foundation for a complimentary network accessible to the private providers.

Our strategy encompasses a blend of innovative public-private partnerships, leveraging cutting-edge technology, and utilizing a robust middle-mile network. By capitalizing on existing assets and fostering new alliances, we can provide the community with essential tools for connectivity. This approach, fortified by substantial infrastructure improvements, is a viable path toward affordable and universal internet access.

In our quest to establish a free Wi-Fi system, we are open to diverse models of setup, deployment, funding, and management. The prospects ahead are not only promising but also within grasp. Our commitment is steadfast: to explore every possible route to deliver on our pledge of internet for all, free of municipal cost barriers.



Introducing free islandwide wireless data service in Guam addresses the pressing issue of affordability, ensuring every resident has foundational access to the digital world. However, implementing this can raise concerns about competition with existing carriers.

Here's how this initiative can address affordability without undercutting carriers:

1. Basic Access for All: Offering a complimentary basic service tier above ‘Unserved’ but below ‘Served’ ensures essential online access for everyone. Local networking experts have agreed that serving up to 30 Mbps/dl and 5 Mbps/ul– which is often an entry point for middle income households – is feasible. Existing carriers can still hold their ground, offering enhanced speeds and specialized packages that cater to varying user demands.

2. Gateway to Advanced Services: By introducing more individuals to the benefits of online connectivity, there's a higher likelihood they'll eventually seek advanced, paid services from carriers as their needs evolve.

3. Collaboration Over Competition: Partnering with carriers to design this service means shared responsibilities and benefits. It's a collective effort towards a digitally inclusive society.

4. Utilizing Existing Infrastructure: Instead of building from scratch, leveraging the current infrastructure, whether it belongs to carriers, the public, or both, means faster deployment.

5. Filling the Gaps: The free service can primarily target areas that carriers currently don't serve or are underserved, ensuring minimal overlap.

6. Boosting the Local Digital Ecosystem: With the ever increasing number of residents online, there's potential growth in local online enterprises, e-commerce, and e-services. This expanded digital activity can indirectly lead to a higher demand for advanced carrier services.

7. Competitive Governance and Service Bidding: To keep government out of the direct ISP business, governance and certain service aspects can be bid out competitively. This ensures a dynamic, competitive landscape and leverages expert capabilities without overstepping government's boundaries.

The intent behind providing free islandwide wireless service is not to rival carriers but to create a foundation that is beneficial to all Guam residents, regardless of economic status. While everyone has access to free basic digital access, carriers remain indispensable for those seeking a more robust digital experience.



Responsible Governance

A franchise model for the governance of free islandwide internet architecture essentially involves granting certain rights or privileges to private entities (or even public-private partnerships) to establish, operate, and maintain internet infrastructure in specific areas or throughout the island.

1. Framework Establishment:

Regulatory Oversight: The Broadband Office oversees and that the granted franchises adhere to the terms of their contracts and meet the needs of the island's inhabitants as subgrantees.

- **Clear Guidelines:** The governance body must set clear guidelines for franchisees, including service quality standards, pricing caps or guidelines, and any required investments in infrastructure or community services.

2. Franchise Bidding and Award Process:

- **Proposal Call:** Government opens a call for proposals to private entities or consortiums interested in obtaining a franchise.
- **Evaluation:** Proposals are evaluated based on technical capability, financial strength, infrastructure investment commitment, and proposed consumer pricing.
- **Award:** The franchise(s) is awarded to the entity/entities that meet the criteria and offer the most beneficial terms for the island and its inhabitants.

3. Operation Under the Franchise Model:

- **Exclusive or Non-exclusive Rights:** Depending on the strategy, a single entity could be given exclusive rights for a specific duration, or multiple entities could be granted non-exclusive rights to operate in different areas or sectors.
- **Infrastructure Maintenance:** Franchisees maintain the necessary infrastructure in line with the approved plan and in adherence to set standards.
- **Service Provision:** Franchisees provide internet services to consumers, adhering to pricing and quality standards set by the governing body.

4. Benefits and Revenue Generation:

- **Franchise Fees:** The governing body collects franchise fees, either as a lump sum, yearly payment, or a percentage of revenues.
- **Shared Infrastructure:** Existing public infrastructure, such as utility poles or ducts, can be leased to franchisees, generating additional revenue for the government.

5. Accountability and Quality Assurance:

- **Regular Audits:** The regulatory body conducts regular audits to ensure that franchisees fulfill their obligations.
- **Consumer Feedback:** A mechanism to collect and address consumer feedback ensures that the quality of service remains high and meets user expectations.

6. Periodic Review and Renewal:

- **Contract Duration:** Each franchise agreement has a set duration, after which it is up for renewal.
- **Performance Review:** Before renewal, the franchisee's performance is reviewed. If they have met or exceeded expectations, the contract can be renewed. Otherwise, the franchise may be opened up for new bidding.

7. Digital Equity and Inclusivity:

- **Mandatory Coverage:** To ensure digital equity, franchise agreements can mandate service provision to underserved or remote areas.
- **Mandatory Affordability:** Franchisees and participating carriers must offer lower rates to the consumer.

This model can work well if there's adequate oversight and the interests of the island's residents are prioritized. It balances the efficiency and innovation of private sector involvement with public sector oversight and objectives.

2.14.2 Financial Data Entry:

Enter the amount of the Initial Proposal Funding Request \$156,831,733.59

- Check Box:** Certify that the Eligible 2.14.3e Entity will adhere to BEAD Program requirements regarding Initial Proposal funds usage. If the Eligible Entity is not requesting funds in the Initial Proposal round and will not submit the Initial Proposal Funding Request, note “Not applicable.”

2.15 Eligible Entity Regulatory Approach (Requirement 18)

2.15.1 Text Box:

No existing laws in Guam re, regulations against Gov. Broadband Activities.

2.15.1.1 Optional Attachment: As a required attachment only if the Eligible Entity will not waive laws for BEAD Program project selection purposes, provide a list of the



laws that the Eligible Entity will not waive for BEAD Program project selection purposes, using the Eligible Entity Regulatory Approach template provided.

2.16 Certification of Compliance with BEAD Requirements (Requirement 19)

- Certify the Eligible Entity's intent to comply with all applicable requirements of the BEAD Program, including the reporting requirements.

Subgrantee Post-Award Monitoring

1. **Develop a Monitoring Plan:** Create a detailed plan outlining what areas, activities, and performance indicators will be assessed during the monitoring process. Align this plan with the grant agreement and compliance requirements.
2. **Schedule Monitoring Visits:** Coordinate with the subgrantee to schedule monitoring visits or assessments at their location or through remote means, depending on the nature of the grant and subgrantee activities.
3. **Conduct Initial Meeting:** Start the monitoring process by meeting with the subgrantee to explain expectations, review the monitoring plan, and address any questions or concerns.
4. **Assess Financial Management:** Review the subgrantee's financial practices, including budget usage, record-keeping, and adherence to cost principles mentioned in the grant agreement. Ensure that expenses match the approved budget and are appropriately documented.
5. **Evaluate Program Performance:** Assess the subgrantee's program performance by examining progress reports, program deliverables, and performance metrics in the grant agreement. Evaluate how practical their activities are in achieving the intended outcomes.
6. **Compliance and Regulatory Review:** Ensure the subgrantee complies with all relevant federal, state, and local regulations, as well as any specific compliance requirements outlined in the grant agreement. This may involve reviewing documents, policies, procedures, and adherence to applicable laws.
7. **Document Findings:** Keep detailed records of the monitoring activities, including observations, findings, and any identified issues or areas for improvement. Use a consistent reporting format to record information accurately.
8. **Provide Feedback and Recommendations:** Share the findings with the subgrantee, highlighting successes and offering constructive feedback on areas that need improvement. Make recommendations for corrective actions or enhancements to ensure compliance and program effectiveness.



9. **Follow-Up and Corrective Action:** Establish a follow-up process to address any identified deficiencies or non-compliance issues. Monitor the implementation of corrective actions and offer necessary support or resources to assist the subgrantee in meeting compliance requirements.
10. **Ongoing Monitoring:** Depending on the grant agreement, create a schedule for ongoing monitoring to assess the subgrantee's progress and compliance throughout the grant period. This may involve periodic site visits, regular reporting, or other monitoring activities.
11. **Documentation and Reporting:** Maintain accurate records of the monitoring process, findings, corrective actions, and any communication with the subgrantee. Prepare and submit monitoring reports as required by the grant agreement or regulations.

2.5.1 Subgrantee Evaluation and Award Process

The Office of Infrastructure Policy and Development (OIPD), Guam Broadband Initiative, and Guam Digital Equity Initiative, are committed to ensuring a fair and transparent process for evaluating grant applications. OIPD welcomes all eligible organizations to submit their grant or subgrantee applications for consideration.

To ensure a fair evaluation process, OIPD requires that all grant applications be submitted in a standardized format, which will be made available on our website. The application should include a detailed project description, budget breakdown, and measurable outcomes. Applicants must also demonstrate a clear understanding of the needs of the community they seek to serve and the ability to implement the proposed project effectively.

To ensure alignment with our mission, OIPD requires that grant applications be scored on their merits of alignment with the Broadband Equity Access and Deployment federal grant. We strongly encourage applicants to review this grant program's eligibility criteria and requirements before submitting their application.

All grant applications will be evaluated by a committee of subject matter experts who will assess each application on its own merits. Applications will be scored based on several factors, including the proposed project's potential impact on the community, the project's feasibility, the applicant's capacity to implement the project successfully, and the alignment with the Broadband Equity Access and Deployment grant program.

OIPD is committed to a fair, objective, and transparent evaluation process. All applicants will receive a notification of the decision on their application, and we welcome any questions or feedback on the evaluation process.



To apply, interested organizations must follow the steps below:

1. Review the grant guidelines and eligibility requirements on the OIPD website.
2. Complete the grant application form and submit all required documentation, including a detailed project proposal and budget plan. Unless otherwise indicated, deadlines will be 5 p.m. (Chamorro Standard Time) of the stated deadline, emailed to broadband@guam.gov in PDF format. Any proposals received after the deadline will not be accepted. An original hard copy and a number of copies to be determined by OIPD must be submitted to the Office within the first five days of the deadline.
3. The question and answer period to OIPD will be determined by OIPD, and announced in a published advertisement in a local newspaper of general circulation.
4. Applications will be evaluated and scored based on their alignment with the Broadband Equity, Access, and Deployment (BEAD) federal grant.
5. Finalists will be notified and may be invited to submit additional information or participate in an interview with the OIPD.
6. Grant recipients will be notified and provided with detailed instructions for next steps, including project reporting and compliance requirements.

2.16.3

- Certify that the Eligible Entity will account for and satisfy authorities relating to civil rights and nondiscrimination in the selection of subgrantees.

2.16.4

- Certify that the Eligible Entity will ensure subgrantee compliance with the cybersecurity and supply chain risk management requirements on pages 70 - 71 of the BEAD NOFO to require prospective subgrantees to attest that:**

Cybersecurity

- 1) The prospective subgrantee has a cybersecurity risk management plan (the plan) in place that is either: (a) operational, if the prospective subgrantee is providing service prior to the award of the grant; or (b) ready to be operationalized upon providing service, if the prospective subgrantee is not yet providing service prior to the grant award;
- 2) The plan reflects the latest version of the National Institute of Standards and Technology (NIST) Framework for Improving Critical Infrastructure Cybersecurity



(currently Version 1.1) and the standards and controls set forth in Executive Order 14028 and specifies the security and privacy controls being implemented;

3) The plan will be reevaluated and updated on a periodic basis and as events warrant; and

4) The plan will be submitted to the Eligible Entity prior to the allocation of funds. If the subgrantee makes any substantive changes to the plan, a new version will be submitted to the Eligible Entity within 30 days.

Supply Chain Risk Management (SCRM)

1) The prospective subgrantee has a SCRM plan in place that is either: (a) operational, if the prospective subgrantee is already providing service at the time of the grant; or (b) ready to be operationalized, if the prospective subgrantee is not yet providing service at the time of grant award;

2) The plan is based upon the key practices discussed in the NIST publication NISTIR 8276, Key Practices in Cyber Supply Chain Risk Management: Observations from Industry and related SCRM guidance from NIST, including NIST 800-161, Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations and specifies the supply chain risk management controls being implemented;

3) The plan will be reevaluated and updated on a periodic basis and as events warrant; and

4) The plan will be submitted to the Eligible Entity prior to the allocation of funds. If the subgrantee makes any substantive changes to the plan, a new version will be submitted to the Eligible Entity within 30 days. The Eligible Entity must provide a subgrantee's plan to NTIA upon NTIA's request.

2.17 Volume II Public Comment

2.17.1 Text Box: Describe the public comment period and provide a high-level summary of the comments received during the Volume II public comment period and how they were addressed by the Eligible Entity. The response must demonstrate:

- a. a. The public comment period was no less than 30 days; and
- b. b. Outreach and engagement activities were conducted to encourage feedback during the public comment period.

This will be verified for final submission to NTIA.

2.17.2 Optional Attachment: As an optional attachment, submit supplemental materials to the Volume II submission and provide references to the relevant requirements. Note that only content submitted via text boxes, certifications, and file uploads in sections aligned to Initial Proposal requirements in the NTIA Grants Portal will be reviewed, and supplemental materials submitted here are for reference only.



N/A

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