

HAWAI'I BEAD FINAL PROPOSAL

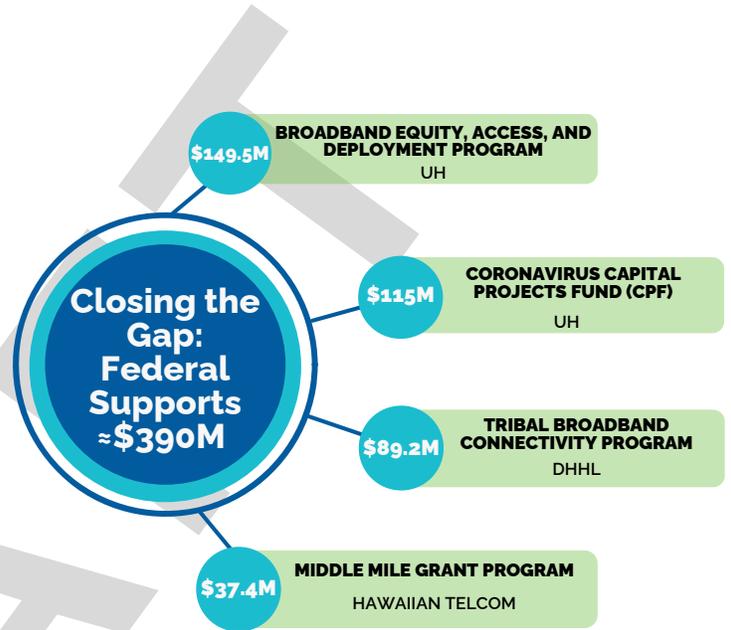
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In collaboration with Governor Josh Green, M.D., Lieutenant Governor Sylvia Luke has launched Connect Kākou with partners from the Hawai'i Broadband Office (HiBO), the University of Hawai'i (UH), the Department of Hawaiian Home Lands (DHHL), and multiple state and county agencies. Connect Kākou encompasses all broadband efforts across the State.

In total, more than \$390 million has been allocated to Hawai'i through the National Telecommunication and Information Administration (NTIA), the Department of Treasury, the Federal Communications Commission (FCC), and other federal agencies to work towards the goal of universal access to high-speed Internet. UH has been tasked with leading the largest effort, the Broadband Equity, Access, and Deployment (BEAD) Program, a \$149.5 million program to build out last-mile connections to all of Hawai'i's unserved and underserved locations, as well as eligible community anchor institutions.

The UH Broadband Office (UHBO) has developed a series of draft plans outlining how it will deploy BEAD funds. The first was the Five-Year Action Plan, released in June 2023, followed by the Initial Proposal in December 2023 and finally, the Final Proposal.

The BEAD Final Proposal details how Hawai'i will ensure that every resident has access to reliable, affordable, high-speed Internet connection from their home. First and foremost, the Final Proposal unveils the Hawai'i BEAD Challenge Process results and the locations eligible for BEAD funding, as well as, the subgrantees procured to build out Internet infrastructure to eligible locations in the defined project areas.



CHALLENGE PROCESS RESULTS

The State of Hawai'i's Challenge Process was held in a transparent, fair, expeditious, and evidence-based manner from August 2024 to December 2024 as follows, using the December 31, 2023 version of the FCC National Broadband Map published on May 14, 2024 as the starting data for the Challenge Process:

- Challenge Phase: Aug 19, 2024 – Sep 18, 2024 (30 days)
- Rebuttal Phase: Oct 7, 2024 – Nov 6, 2024 (30 days)
- Final Determination Phase: Nov 7, 2024 – Dec 7, 2024 (30 days)

A total of 37,593 challenges were received. Hawaii's BEAD Challenge Process Results were approved by the NTIA on December 20, 2024. The challenge results map is available at <https://register.challenge.connectkakou.org/register/bead/map>

37,593

challenges received

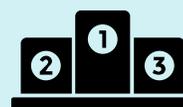
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Eligible Locations

2

Additional CAIs

Top 3 Challenge Types



1. Enforceable Commitment
2. Planned Service
3. Availability

DATA SUBMISSIONS FILES

The official Hawai'i BEAD Final Proposal submission includes a number of required data file submissions, detailed below:

Subgrantees CSV File: Lists all provisionally awarded subgrantees who will perform Internet infrastructure buildout in the State's defined project areas

Deployment Projects CSV File: Summarizes the outcomes of the subgrantee selection process, including planned deployment descriptions, timelines, and cost

Locations CSV File: The final list of unserved and underserved locations that will receive BEAD funding to receive 100/20 Mbps speed access.

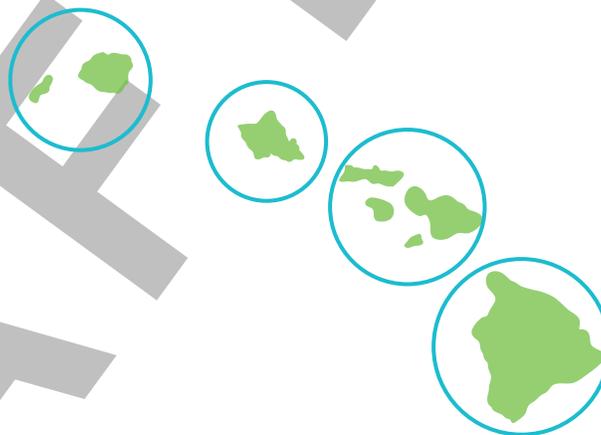
No BEAD Locations CSV File: Explains the reasons select BEAD-eligible locations will not be served by the BEAD Program. Examples include locations identified as non-residential locations (such as schools), receiving other funding, and water tanks.

Community Anchor Institution (CAIs) CSV File: Lists CAIs to be funded under the BEAD Program to receive 1Gbps symmetrical speeds access.

PROJECT AREAS

There are four unique deployment project areas in Hawai'i. Each defined project area saw two Request for Proposal (RFP) releases: one for unserved and underserved locations; and one for all eligible CAIs within that project area. Project areas are as follows:

1. County of Hawai'i
2. City and County of Honolulu
3. County of Kaua'i
4. County of Maui (inclusive of Kalawao)



SUBGRANTEE SELECTION PROCESS OUTCOMES

Hawai'i released all eight deployment RFPs on July 11, 2025. Proposals were due on August 1, 2025. The RFP process involved potential subgrantees (also known as Offerors) responding to the RFP with proposals to serve all unserved, underserved, and community anchor institution (CAI) locations.

As described in the BEAD Restructuring Policy Notice (RPN), UHBO made the following changes to the RFP:

- Updated its NTIA-approved post-challenge process lists of unserved, underserved, and CAI locations
- Identified and notified any unlicensed fixed wireless providers that served any BEAD-eligible locations
- Reevaluated its CAI list in accordance with the statutory definition.
- Removed non-statutory requirements as part of the scoring criteria and subgrantee requirements in the RFP.
- Allowed Offerors to propose their own a low-cost broadband service option and price.

Hawai'i did not have a prequalification phase for subgrantee selection and allowed all provider types to participate in the RFP. Following the RFP proposal submission deadline, all Offeror responses were collected and scored based on whether the proposal was considered a "Priority Broadband Project" or a "Non-Priority Broadband Project" using the definition in the RPN. Proposals considered a "Priority Broadband Project" were scored and awarded prior to those considered a "Non-Priority Broadband Project."

UHBO received multiple applications in this competitive process for each project area. Proposals were scored objectively and fairly, with the review committee verifying no conflicts of interest, no collusion, all applicants acknowledging no collusion amongst providers, consistent with the Federal Communications Commission's prohibited communications rules for auctions, and disclosure of company ownership information from Offerors.

SUBSTANTIATION OF PRIORITY BROADBAND PROJECTS

UHBO adopted the RPN's definition of a "Priority Broadband Project" or a "Non-Priority Broadband Project" when evaluating proposals submitted for unserved and underserved locations. Specifically, to be considered a "Priority Broadband Project", UHBO evaluated whether the proposal demonstrated it was *"a project that provides broadband service at speeds of no less than 100 megabits per second for downloads and 20 megabits per second for uploads, has a latency less than or equal to 100 milliseconds, and can easily scale speeds over time to meet the evolving connectivity needs of households and businesses and support the deployment of 5G, successor wireless technologies, and other advanced services."*

UHBO adopted similar language for CAIs to evaluate whether the proposal for CAI would be considered a priority broadband project, differing only in the 1 Gbps symmetrical speed requirements.

Proposals considered "Priority Broadband Projects" were scored and awarded for each project area prior to scoring and awarding proposals considered "Non-Priority Broadband Projects". As such, if there were two proposals for a project area, one being a "Priority Broadband Project" and the other a "Non-Priority Broadband Project", the "Priority Broadband Project" would be automatically awarded.

SUBGRANTEE SELECTION CERTIFICATION

Scoring criteria for the subgrantee selection process is detailed in both tables on the right. A description of what each of these criteria signifies is detailed below:

Minimal BEAD Program Outlay: Comprised of two parts, the requested BEAD funding amount and the cost per location. Each part is scored separately (out of 100 points), then added together to get a maximum of 200 points. The proposal with the lowest amount of requested BEAD funding AND the lowest cost per location will receive the maximum score.

Speed to Deployment: Based on the committed total duration required to deploy connectivity and begin providing services to defined areas.

Speed of Network and Other Technical Capabilities: Based on the maximum speed, latency, and other technical capabilities offered as well as the longevity (useful life) of the infrastructure, and cost effectiveness of future scalability.

Proposals received were categorized as either a priority or a non-priority broadband project based on the definition in the BEAD RPN. Using the process described in the BEAD RPN, if a proposal's costs was within 15% of the lowest proposal's costs, the secondary scoring criteria would have been used in the

scoring since there were no other priority broadband project proposals that were within the 15% cost threshold, the Minimal BEAD Program Outlay was the only applicable criterion used in the scoring and selection of the proposals.

UNSERVED & UNDERSERVED PRIORITY BROADBAND PROJECTS SCORING CRITERIA	POINTS
Primary Criteria (200 Points)	
Minimal BEAD Program Outlay	200
Secondary Criteria (45 Points)	
Speed to Deployment	30
Speed of Network and Other Technical Capabilities	15

CAI PRIORITY BROADBAND PROJECTS SCORING CRITERIA	POINTS
Primary Criteria (200 Points)	
Minimal BEAD Program Outlay	200
Secondary Criteria (40 Points)	
Speed to Deployment	30
Speed of Network and Other Technical Capabilities	10

PROHIBITION OF EXCLUDING PROVIDER TYPES WAIVERS

Hawai'i certifies that it did not exclude cooperatives, nonprofit organizations, public-private partnerships, private companies, public or private utilities, public utility districts, or local governments from eligibility for a BEAD subgrant.

TIMELINE FOR IMPLEMENTATION

The Request for Proposals (RFP) scope of work included that the subgrantee will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant. The RFP also included scoring criteria incentivizing subgrantees to complete the deployment in less than four years.

According to the Hawai'i Initial Proposal Volume 2 (IPV2), Section 2.16, subgrantees will be required to provide reports detailing deployment progress and expenditures for reimbursement and project oversight. UHBO will also conduct site visits and desk reviews of subgrantee progress to ensure the project is within the subgrantee's proposed timeline. UHBO will ensure that all subgrant activities are completed at least 120 days prior to the end of the period of performance and ensure that all programmatic BEAD grant activities undertaken by the State of Hawai'i are completed by the end of the period of performance for its award.

OVERSIGHT AND ACCOUNTABILITY PROCESSES

Hawai'i has a number of policies and practices in place to maintain oversight and accountability. Hawai'i has created a BEAD Program monitoring plan consisting of subgrantee reporting, site visits, desk reviews, and risk assessment. Quarterly project and expenditure reports will be required for all subgrantees as well as two closeout reports. Site visits will occur twice a year to document the construction and progression of BEAD projects. Additional site visits may be conducted if a subgrantee fails to deploy projects in a timely manner that adheres to their proposed timeline to service. Desk reviews will also be conducted quarterly to ensure:

- Deployment progress is made and reported
- Contract and compliance with the BEAD NOFO, Environmental and Historical Preservation, Build America Buy America, and other federal or state laws
- Subgrantees expend Federal funds as authorized within the performance period
- The project is completed on time, and limits potential waste, fraud, and abuse of federal funding

LOW RISK IF ALL ARE TRUE	MEDIUM RISK IF ONLY ONE IS TRUE	HIGH RISK IF MORE THAN ONE IS TRUE
The subgrantee submits timely reporting	The subgrantee does not submit timely reporting	
Subgrantee is responsive to UHBO inquiries	The subgrantee is not responsive to UHBO inquiries	
Deployment progress is on track or only slightly delayed	Deployment progress is severely delayed	
Subgrantee is compliant with BEAD requirements	The subgrantee is non-compliant with BEAD requirements	

Satisfactory review ensures disbursement of BEAD funds to the subgrantee. If any issues are determined, Hawaii will work with the subgrantee to correct them. Finally, subgrantees will be assigned a risk category. Risk categories are described in the table above. Note that any subgrantees that are determined to be high risk are subject to clawback or a suspension of funding reimbursement.

Finally, a fraud, waste, and abuse hotline is available for citizen reports. See <https://ethics.hawaii.gov/anti-fraud/> for more.

UNSERVED AND UNDERSERVED LOCATIONS

Hawai'i will ensure coverage of broadband service to all approved unserved AND underserved locations within the State. Offerors were required to validate all post-challenge unserved broadband serviceable locations (BSL) as part of Hawaii's deployment subgrantee selection process. Upon validation and review by UHBO, specific locations were identified as invalid BSLs (i.e., should not need broadband) because they are water tanks, greenhouses, solar panels, farm fields, or other structures not needing broadband. Therefore, these locations will not be served through BEAD.

ENVIRONMENTAL AND HISTORIC PRESERVATION (EHP) DOCUMENTATION

Hawaii will work with awarded subgrantees to comply with applicable federal and state environmental and historic preservation (EHP) requirements. Subgrantees will be required to analyze potential EHP impacts and obtain the necessary federal, state, and local permits prior to conducting any deployment construction activities.

UH will serve as the joint lead agency with NTIA for NEPA, and will be responsible for supervising subgrantees to prepare any environmental analyses and review documents for submission to NTIA for review via the Environmental Screening and Permitting Tracking Tool (ESAPTT). UH will work with subgrantees to meet their proposed timelines and obtain necessary permits and documents from appropriate entities for deployment.

Per requested review by NTIA, UHBO has determined that the analysis in the FirstNet Programmatic Environmental Impact Statement (PEIS) for Hawaii is sufficient for anticipated deployment-related projects within Hawaii. UHBO lists the following notable updates since the FirstNet PEIS chapter was released:

Regulatory Changes: In 2019, Hawaii passed laws updating Hawaii Administrative Rules (HAR) Chapter 11-200.1 for the environmental review process in the State. These laws include updated definitions, procedures, and criteria for agencies or persons performing activities impacting the environment to gain the necessary exemptions or permits.

Affected Environment: Hawaii's unique biodiversity and sensitive ecosystems make it the State with the most species on the U.S. Fish and Wildlife Service's Endangered Species list. In March 2024, the U.S. Fish and Wildlife published a final rulemaking decision for 12 federally listed endangered species, designating 119,326 acres of federal, state, and private lands on the Island of Hawai'i as critical habitats to minimize and/or mitigate impacts of federal actions to their critical habitat.

UHBO will make all subgrantees aware of such regulatory and affected environment updates in addition to the PEIS analysis to ensure compliance with federal and state EHP requirements. In addition, UHBO plans to include NTIA mandated EHP specific award conditions to contracts to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

IMPLEMENTATION STATUS OF PLANS FOR COST AND BARRIER REDUCTION, COMPLIANCE WITH LABOR LAWS, LOW-COST PLANS, AND NETWORK RELIABILITY AND RESILIENCE

- Provisional subgrantees have agreed to comply with the following:
1. Certify compliance with existing federal labor and employment laws.
 2. Offer a low-cost broadband service option for the duration of the ten (10) year Federal interest period.
 3. Have planned for the reliability and resilience of BEAD-funded networks.

TASK	STATUS
Promoting the use of existing infrastructure	In Progress
Promoting and adopting dig-once policies	In Progress
Streamlining permitting processes	In Progress
Streamlining cost-effective access to poles, conduits, easements	In Progress
Streamlining rights of way, including the imposition of reasonable access requirements	In Progress

LOCAL COORDINATION

The Final Proposal was posted for Public Comment on the UH Broadband website on August 27, 2025 and publicized in the Connect Kākou email newsletter. Acceptable methods to submit public comment include telephone and email. The Public Comment period is open for seven (7) days and concludes on September 3, 2025. Comments and feedback will be reviewed and incorporated in the final BEAD Final proposal, due to the NTIA on September 4, 2025.

Submit public comment at:

- Email: broadband@hawaii.edu
- Telephone: (808) 956-9301