

Bree Maki
Executive Director
State of Minnesota Department of Employment & Economic Development, Office of Broadband
Development
180 5TH ST E, STE 1200
St. Paul, MN 55101-2672

Courtney Dozier
Acting Director
Broadband Equity, Access, and Deployment Program
National Telecommunications and Information Administration

Re: June 6, 2025, BEAD Restructuring Policy Notice

Dear Mrs. Dozier,

The Minnesota Office of Broadband submits this letter pursuant to the National Telecommunications and Information Administration (NTIA) June 6, 2025, BEAD Restructuring Policy Notice (Notice) and seeks your collaboration in our state's federal Broadband Equity, Access and Deployment (BEAD) programming.

As required by NTIA's Notice, Minnesota submits this letter to request an Initial Proposal (IP) correction pursuant to the Notice. This letter requests incorporation of the terms of the Notice into our IP. Minnesota confirms that it must modify its previously approved subgrantee selection process to conform to the terms of the Notice. It will also take all the other actions needed to conform the implementation of its BEAD award to the requirements contained in the Notice. In reliance from NTIA that Minnesota is eligible for and will receive the full allocation of the originally awarded \$651,839,368.20, Minnesota will not submit a budget modification to accompany this IP correction request.

Since 2021, the Minnesota Office of Broadband Development (OBD) has diligently worked to follow the federal guidance to administer the strongest possible BEAD program with the funds NTIA allocated to Minnesota. NTIA's Notice changes the role of technology in the BEAD program. The Notice considers other technologies including Unlicensed Fixed Wireless as reliable broadband options to be scored on the same level as fiber projects and be eligible to be considered a priority broadband project. The Notice's technology neutral requirement for the BEAD program eliminates the state's ability to have any rounds of subgrantee selection where applicants are awarded with a preference for fiber.

Quality, reliable broadband is an essential economic development tool that helps Minnesota communities grow and thrive, gain workers, and support business vitality. In recognition of this, and in compliance with previous BEAD guidelines that prioritized fiber and Minnesota's NTIA-approved IP, OBD held a first round of subgrantee selection beginning in March 2025 where priority broadband projects

were end-to-end fiber projects. Additionally, OBD also conducted an optimization analysis in 2024 with the expectation of setting a pricing threshold for BEAD applicants to meet the state's goals of maximizing the use of fiber and BEAD funding while also recognizing that all technologies will be necessary to ensure all residents and businesses get broadband.

We thank you for your continued engagement as a crucial partner in the work of building connections and working together for all Minnesotans.

Sincerely,

Bree Maki, Executive Director
Minnesota Office of Broadband Development
July 2, 2025