



PBDA BEAD Updates to Round Two

The National Telecommunications and Information Administration (NTIA)'s [BEAD Restructuring Policy Notice](#), released on June 6, 2025, mandates revisions to the Broadband Equity, Access, and Deployment (BEAD) Program. The Pennsylvania Broadband Development Authority (PBDA) will adhere to these changes by revising elements of the second application round of its BEAD Program. Revised program guidelines will be released on July 18, 2025. Applicants are encouraged to review updated guidelines thoroughly before submitting an application. Key updates to the document are as follows:

Elimination of Non-Statutory Requirements:

The BEAD Restructuring Policy Notice calls for elimination of several non-statutory requirements included in the [BEAD NOFO](#)¹. PBDA eliminated several non-statutory requirements from application scoring, grant agreements, and grant reporting requirements, including the following:

- “Advancing Equitable Workforce Development and Job Quality Objectives”
- “Civil Rights and Nondiscrimination Law Compliance”
- “Contracting with Small and Minority Businesses, Women’s Business Enterprises, and Labor Surplus Area Firms”
- “Climate Resilience”
- Local coordination and stakeholder engagement requirements
- Open Access and Net Neutrality provisions
- Middle-Class and Low-Cost Affordability plans²

Updated Definition of “Priority Broadband Project”:

While PBDA will continue to prioritize “Priority Broadband Projects”, its definition for what qualifies has been updated based on NTIA requirements. Rather than solely preferencing end-to-end fiber as its main criterion, a Priority Project now includes one designed to provide broadband service that meets speed, latency, reliability, and consistency in quality of service. Providers must ensure that the network built by the project can easily scale speeds over time to meet the evolving connectivity needs of households and businesses. It must also support the deployment of 5G, successor wireless technologies, and other advanced services³.

Technology Neutral Approach:

New policy requirements eliminate technology preferences. Under previous guidance, applications that included unlicensed fixed wireless (ULFW) and low-earth orbit (LEO) satellite would not be considered as Priority Broadband Projects, limiting the scoring potential of those technologies. Based on updated guidance, PBDA will not categorically exclude any technology that meets standards set by the Infrastructure Investment and Jobs Act (IIJA) and the BEAD NOFO as being eligible for the priority scoring category and will not give preference to any particular technology.

BEAD applicants will be required to provide supporting documentation that allows PBDA to assess the network application and determine that proposed network architecture for each specific project area meets required standards. Information about how PBDA will evaluate network capacity based on technology is outlined in program guidelines.

¹ Published on May 12, 2022.

² A Low-Cost Service Option is still required for BEAD applications. Updated terms are outlined in this document.

³ NTIA BEAD Restructuring Policy Notice: <https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf>



BEAD grants issued to LEO providers will be based on network capacity. These projects must begin to deliver broadband service that meets the BEAD performance and technical requirements to each BSL in the project area and each customer that desires broadband service not later than four years from the date of the grant award. Additionally, PBDA will set an extended period of performance of 10 years for LEO grantees.

Applicants applying with ULFW technology will be required, through their BEAD application, to demonstrate that they have taken the necessary steps to resolve potential interference and capacity constraints associated with such technology. PBDA's methods for evaluating ULFW providers' technical issue mitigation strategies are outlined in program guidelines.

Updated Application Timeline and Benefit of the Bargain Round (Round Two):

PBDA will conduct its second application window as a "Benefit of the Bargain" round, which will commence on July 18, 2025⁴. To meet NTIA's revised program timeline, the application window has been reduced to a total of 14 calendar days.

Per NTIA guidance, applications submitted during the first and second rounds will be evaluated based on updated scoring criteria (outlined below). Round One applicants are encouraged (but not required) to make revisions to their submitted application materials. If an applicant from Round One is no longer interested in having its applications considered for BEAD, the applicant can notify PBDA to indicate this preference and their application(s) will be withdrawn.

Eligible Applicants:

NTIA's policy updates requires that PBDA may no longer prioritize non-traditional internet service providers for BEAD grants. All applicants will receive the same consideration, assuming other program requirements are met.

Cost Reasonableness in Priority Broadband Projects:

PBDA will no longer establish a formal Extremely High Cost Per Location Threshold (EHCPLT). Instead, PBDA will assess the cost reasonableness of each proposed Priority Broadband Project on a case-by-case basis and will reject any that reflect an excessive cost per location.

Benefit of the Bargain Scoring Criteria:

Round Two scoring criteria, which was posted to [PBDA's BEAD webpage](#) on June 18, 2025, has been updated to align with NTIA's standards for a technology neutral approach. While PBDA would have previously evaluated projects based on a list of primary and secondary factors⁵, with preference for fiber technology, minimal BEAD outlay will be now be scored specifically based on the goal of minimizing cost of deployment.

Updated guidance allows for competing applications that meet the Priority Broadband Project definition and propose subsidy amounts within 15% of one another in the same general project area to be evaluated using the Secondary Scoring Criteria, which include network speed, speed to deployment, and other technical capabilities.

Low-Cost Service Option:

Through the Policy Notice, NTIA eliminated the "Affordability and Low-Cost Plans" section of the NOFO but retained the statutory requirement to offer at least one affordable service to eligible subscribers to BEAD-funded networks. Thus, applicants must outline a Low-Cost Service Option (LCSO) that includes a rate set by the provider (not PBDA) that offers speeds of at least 100/20 Mbps and latency performance of no more than 100 milliseconds. This option must be offered

⁴ Contingent upon PBDA board approval of program guidelines.

⁵ Including workforce development strategies, fair labor practices, affordability, open access (formerly a secondary criterion) and local coordination efforts (also formerly a secondary scoring criterion).



to eligible subscribers through the 10-year federal period of interest (or a 10-year period of performance for LEO capacity grants). Applicants seeking flexibility to change the proposed LCSO rate over time must include a methodology in the application for how adjustments will be managed.

For purposes relating to the Low-Cost Service Option, PBDA defines an “eligible subscriber” as “any household seeking to subscribe to broadband internet access service that is eligible for the FCC’s Lifeline Program. This includes consumers with a household income at or below 135% of the Federal Poverty Guidelines or be enrolled in federal assistance programs like SNAP, Medicaid, or Federal Public Housing Assistance⁶”.

⁶ NTIA BEAD Restructuring Policy Notice: <https://www.ntia.gov/sites/default/files/2025-06/bead-restructuring-policy-notice.pdf>