$1 BILLION in funding has been designated for the Middle Mile Grants Program (MMGP). The NTIA will administer these grants on a competitive basis to eligible entities for the construction, improvement, and acquisition of middle-mile infrastructure in order to lower the costs of connecting unserved and underserved areas.

The MMGP is a matching funds program; a grant may not exceed 70% of the total project cost. The required 30% can be in kind or by approved federal funding programs.

PROGRAM GOALS
The MMGP enables the expansion and extension of middle-mile infrastructure to reduce the cost of connecting unserved and underserved areas to the internet backbone, while also promoting broadband connection resiliency through the creation of alternative network connection paths that can be designed to prevent single points of failure on a broadband network.

ELIGIBILITY
To be eligible, an applicant must prioritize:

- Connecting middle mile infrastructure to last mile networks that provide broadband service to households in unserved areas
- Connecting non-contiguous trust lands
- Offering wholesale broadband service at reasonable rates on a carrier-neutral basis

FUNDING BREAKDOWN
- 20% to NTIA’s administrative costs
- $980M in available grant funds
- Awards range is $5M to 100M
- Funds must be used within 5 years
- 30% matching funds required
- A grant may not exceed 70% of the total project cost
FUNDING USES

These grants are intended for middle-mile infrastructure that does not connect directly to an end-user. Infrastructure includes:

- Leased dark fiber
- Interoffice transport
- Backhaul
- Carrier-neutral internet exchange facilities
- Carrier-neutral submarine cable landing stations
- Undersea cables
- Transport connectivity to data centers
- Special access transport
- Wired or private wireless broadband infrastructure including:
  - Microwave capacity,
  - Radio tower access
- Other services such as towers, fiber, and microwave links

ELIGIBLE FUNDING ENTITIES

- States
- Political subdivisions of a state
- Tribal governments and Native entities
- Technology companies
- Electric utilities*
- Utility co-ops*
- Public utility districts
- Telecommunications companies
- Telecommunications coops
- Nonprofits
- Regional planning councils
- Economic development authorities

Any regulated utilities are expected to use this grant as a supplement to their core utility capital investment plan in order to fulfill the objectives of this grant program.

LABOR AND RESOURCES

- Construction, improvement, and/or acquisition of facilities and equipment required to deploy middle mile broadband facilities
- Engineering design, permitting and work related to environmental, historical and cultural reviews
- Personnel costs, including salaries for staff and consultants required for the implementation of the MMGP (ie, project managers, directors, experts, attorneys)

PRE-APPLICATION EXPENSES

Reasonable pre-application expenses, including those related to preparing an application, may be reimbursed. **These costs cannot exceed $50k.**

Pre-application costs will only be eligible if incurred between May 13, 2022, and the allocation of the grant. They should be clearly identified in the proposed project budget. They must also be approved by NTIA and the Grants Officer.

**These costs will not be reimbursed if the proposed project does not receive an award.**
REQUIREMENTS

BUILD AMERICA, BUY AMERICA
Buy America incentivizes sourcing materials for construction within the United States. This applies only to infrastructure that is publicly-owned or serves a public function.

If the public nature of the project is unclear, USDA strongly recommends that applicants complete the application assuming that the requirements apply.

For projects that qualify, these materials must be fully produced in the United States or in an approved eligible country:

- All iron and steel
- All manufactured products
- At least 55% of the components
- All construction materials

The Buy America requirements do not apply to:

- Tools, temporary equipment, and supplies, such as scaffolding
- Equipment and furnishings such as movable chairs, desks, and portable computer gear that is not part of the structure
- Cement and cementing materials such as stone, sand, gravel, or aggregate binding materials

SYMMETRICAL SERVICE
The infrastructure must be capable of providing symmetrical gigabit broadband service to community anchor institutions, including direct interconnect facilities that will facilitate the provision of broadband service to anchor institutions located within 1,000 feet of the middle mile infrastructure.

INTERCONNECTION
Interconnection is a key element of the Middle Mile Grants. Networks built with funds from this program must offer interconnection in perpetuity with reasonable rates and terms to be negotiated with requesting parties. This interconnection includes both the ability to connect to the public internet and physical interconnection for the exchange of traffic.

TRIBAL LANDS: SPECIAL PROVISION
Congress has included special provisions for middle-mile infrastructure deployment to Tribal Lands where the high cost is a barrier to improving access. NTIA will work with Tribal governments and Native entities to designate unserved and underserved areas. NTIA may waive certain requirements of prioritization, buildout deadlines, and cost sharing for infrastructure on native lands.
MIDDLE MILE GRANTS PROGRAM - IIJA FUNDING

PRIORITIZATION

NTIA will prioritize applications that satisfy two or more of the following:

- Adopts fiscally sustainable strategies
- Commits to non-discriminatory last-mile interconnections
- Identifies specific last-mile broadband providers that have expressed written interest in interconnecting with middle-mile infrastructure and demonstrated adequate funding
- Identifies supplemental investments or in-kind support (such as waived permitting fees) that will accelerate the project
- Demonstrates that the middle mile infrastructure will benefit national security interests of the US and DOD

NTIA will also prioritize projects that:

- Use existing rights-of-way, assets, and infrastructure to minimize challenges
- Route the middle-mile infrastructure to enable the connection of unserved community institutions (ie, schools, libraries, healthcare, Tribal anchor institutions)
- Facilitate the development of carrier-neutral interconnection facilities
- Improve the redundancy and resiliency of existing middle-mile infrastructure

TIMELINE

2022 - APPLICATION
- Application Window: June 21 - September 30, 2022

2023 - NTIA REVIEW AND ALLOCATION
- NTIA review completes February 16, 2023
- Grants awarded by NTIA in Q1 2023
- Start date no earlier than March 1, 2023

2023-2029
- Awardees must complete their construction by Q1 2028
- Extensions are possible up to 1 year
HOW TO RECEIVE FUNDING

Applicants must be capable of carrying out the proposed project, including a plan for a credentialed workforce and the financial, managerial, technical, and operational capability to complete and operate the resulting middle mile broadband network.

SPECIAL RULES FOR TRIBES AND NATIVE ENTITIES

Tribal governments and Native entities may qualify for waivers and alternative requirements. Tribal governments and Hawaiian lands have the right to define and certify unserved and underserved areas within their lands.

QUALIFICATIONS

Entities must show capability in the following capacities:

- Managerial
- Technical
- Compliance with Laws
- Operational
- Ownership
- Buildout Benchmarks
- Meeting Statutory Criteria
- Connections to Anchor Institutions
- Fair Labor Practices
- Highly Skilled Workforce
- Advancing Equitable Workforce
  Development and Job Quality Objectives
- Climate Resilience
- Civil Rights and Nondiscrimination Law Compliance
- State Coordination on Broadband Projects

APPLICATION FORMS

Including, but not limited to:

- Standard Form 424: Application for Federal Assistance
- Standard Form 424C: Budget Information for Construction Programs (SF-424C)
- CD-511 Certification Regarding Lobbying
- Standard Form LLL, Disclosure of Lobbying Activities (if applicable)
- Detailed Budget and Budget Narrative
- Project Details and Narrative
PROJECT DETAILS
The project details and narrative must include:

- Executive Summary
- Need and Beneficiaries
- Technical Approach, Service Area, Build Out Plan
- Environmental Description
- Financial Capacity of the Project and Organization
- Implementation and Organization
- Technical details of the proposed project, e.g., technology type

EXECUTIVE SUMMARY
Applicants are required to submit an executive summary. If their proposal is selected for funding, the NTIA may use part or all of this summary for public information & outreach.

NEED AND BENEFICIARIES
- How the applicant’s proposal will advance the MMG Program objectives
- Overview of the route or service area, including rurality and socio-economic indicators
- Need in the proposed service area, including unserved or underserved communities
- Information on existing middle mile offerings in the area, including competitor data
- List of anchor institutions within 1,000 feet of the proposed route (fiber projects only)

TECHNICAL APPROACH
- Network route map(s)
- Network diagram and system design

SERVICE AREA
- List of all interconnection points and points of interest along the proposed route
- A description of the proposed service offerings, including service pricing
- Nondiscrimination, interconnection, and network management plans
- Environmental description of the service area, the project area and its surroundings

BUILD OUT PLAN
- A timeline for the build out/project implementation with critical path, key implementation milestones, and preparations and risk factors
- A plan for using an appropriately skilled and credentialed workforce
- Efforts to ensure climate resilience for the project
- Demonstration that the applicant has accounted for weather and climate risks

ENVIRONMENTAL DESCRIPTION
Describes the physical project area and its surroundings: Whether it occurs on developed land or open space, adjacent natural resources, any protected lands in or near the area. May require site and aerial photographs (ie, Google Maps images) if the project includes construction and/or ground disturbing activities.
PROJECT AND ENTITY FINANCIAL CAPACITY

- Details of the federal grant request and non-federal cost share
- Project budget and funding, including the level of need for federal funding
- Non-federal cost share sources, including the proposed percentage of cash vs. in-kind
- Historical financials for the last 3 years and historical CPA audits for the last 1 year
- Letter of Credit from an eligible bank
- Financial projection and analysis of the project’s sustainability, including subscriptions (last mile network connections, other wholesale services) across an 8 year forecast

IMPLEMENTATION AND ORGANIZATION

Project Organization

- Information on the organization’s capacity and readiness
- Project and organizational chart
- Any materials the applicant seeks to use in demonstrating its eligibility
- Negotiated Indirect Cost Rate Agreement (if applicable)

Coordination and Partnerships

- Project governance documents and a description of key partnerships
- List of all project collaborators, including details on their role and scope of work
- Government and Community Involvement
- Applicant’s coordination with State, Tribal, and local governments, including awareness of the proposed project and any potential impact to service areas
- Applicant’s involvement and coordination with community organizations, unions and worker organizations, or other relevant partners in the proposed service area
- Letters of intent, agreements, or contracts pertaining to other expected users of the proposed middle mile facilities
- Target last mile service objectives, including last mile service provider letters of commitment, agreements, or contracts

Workforce

- Management team and key project personnel resumes, including key personnel at partner organizations or third parties with a significant role in the project
- How the project will incorporate strong labor standards, including project labor and community benefit agreements that offer wages at or above the prevailing rate
- Local hire provisions
- Workforce plans and practices
- Equitable workforce development and job quality objectives
MIDDLE MILE GRANTS PROGRAM - IIJA FUNDING

REPORTING
To ensure grantees remain in compliance with the program requirements, NTIA will require bi-annual reports during funding and a final report upon completion.

<table>
<thead>
<tr>
<th>Report</th>
<th>Due</th>
</tr>
</thead>
<tbody>
<tr>
<td>Performance Report</td>
<td>Bi-Annually during allocation</td>
</tr>
<tr>
<td>Final Report</td>
<td>End of project</td>
</tr>
</tbody>
</table>

PERFORMANCE REPORTS
Bi-annual reports must be submitted within 30 days of the end of the reporting period.

<table>
<thead>
<tr>
<th>Reporting Period</th>
<th>Report Due</th>
</tr>
</thead>
<tbody>
<tr>
<td>October 1st - March 31th</td>
<td>April 30th</td>
</tr>
<tr>
<td>April 1st - September 30th</td>
<td>October 30th</td>
</tr>
</tbody>
</table>

Awardees must report on how they expended grant funds during that six-month period and certify compliance with the Infrastructure Act and the MMGP, describing:

- Each service provided with the grant funds
- Middle mile infrastructure constructed, improved, or acquired, including:
  - Specific routes deployed
  - Splice and interconnection points
  - Interconnection/wholesale agreements with third parties
  - Connections to last-mile infrastructure
- Whether the project prioritizes local hires
- Community Benefit Agreements
- Subwards from the grantee and the projects funded by those subgrantees
- Technical progress reporting information
- Fair Labor Practices

SERVICE AREAS
Awardees must share the location of the middle-mile infrastructure they construct in this program with the NTIA, the FCC, the state's broadband office, and Tribal governments (if the network serves Tribal Lands).
CERTIFYING FAIR LABOR PRACTICES
Awardees must certify that all laborers and mechanics employed by contractors and subcontractors are paid at or above the prevailing wage (per the Davis Bacon Act and related labor laws). If such certification is not provided, an awardee must provide a project employment and local impact report, detailing:

- Number of contractors and subcontractors working on the project
- Number of workers hired directly and/or through a third party
- Wages and benefits of workers by classification
- Whether those wages are at less than the prevailing rate

If a grantee has not certified that a project will use a unionized project workforce or includes a project labor agreement, then the recipient must provide a project workforce continuity plan, detailing steps taken to ensure the project has a sufficient supply of skilled and unskilled labor, including:

- Required professional certifications or in-house training
- Registered apprenticeships and/or labor-management partnership training programs
- Partnerships with entities like unions, community colleges, or community-based groups
- Steps to minimize risks of labor disputes and disruptions
- Steps to ensure a safe and healthy workplace that avoids delays and costs, including:
  - Safety training
  - Certification, and/or license requirements
  - Issues raised by workplace safety committees and their resolution
- The name of any subcontracted entity performing work on the project
- The total number of workers employed by each such entity, disaggregated by job title
- Steps taken to ensure that workers receive wages and benefits sufficient to secure an appropriately skilled workforce

Recipients must maintain sufficient records to substantiate all the information above upon request.

FINAL REPORT
As part of the grant close-out process, grantees will be required to submit a final report that describes the program objectives achieved through completion of the grant-funded project, including the information collected in the bi-annual reports.

More information on the final report will be released in upcoming FAQs from NTIA.
VALUE WIDELITY PROVIDES

Widelity specializes in program and project management. We have provided services to clients seeking funding from multiple jurisdictions and agencies. Our experience in deployment strategy, technology, and supply chain management uniquely qualify us to meet your needs.

**Government Funding Consultant Services**

Widelity ensures compliance with Federal requirements
Widelity handles any Federal Requests For Information (RFIs)

**Submit** ➔ **Review** ➔ **Approve**

RFIs can slow the process by over a year.

[Diagram showing submission process: Submit ➔ Review ➔ Approve with options: Resubmit, Rejected]

**READY TO ASSIST YOU**

- Determine your eligibility
- Organize application materials
- Identify potential issues
- Submit the application
- Support for all post-award compliance and reporting

**REIMBURSABLE WITH GRANT FUNDS**

The Middle Mile Grants Program allows grant funds to be used for up to $50k in eligible pre-application expenses.
WHO WE ARE

Widelity is a Small Business that provides eligible entities Government Funding Consulting Services (GFCS). We write and submit the application, complete any reporting and compliance documentation requirements and support clients to navigate all aspects of government funding programs.

COMPANY DATA & METRICS

- Founded in 2006
- 100+ Personnel
- Processed over 150k documents
- Successfully completed 6k+ RFIs
- Nationwide team and client base
- $395M in client reimbursements
- Clients on track for $2B+ in reimbursements
- Excellent relationship with federally approved program administrators

PAST PERFORMANCE

Successful Government Contracts:
- Report and Catalog of Installation and Replacement Costs for the Wireless Competition Bureau (FCC) (2020 - 2021)
- Exceptional CPARS evaluation rating
- Report and Catalog for the Media Bureau for the Broadcast Incentive Auction (FCC) (2013 - 2014)

Successful client-focused initiatives:
- FCC Broadcast Incentive Auction
- FCC Secure and Trusted Communications Networks Reimbursement
- SBA Shuttered Venue Operators Grant (SVOG) Program
- NTIA Connecting Minority Communities (CMC) Program

CONTACT US

We are experts in fulfilling all government regulatory requirements and look forward to supporting you. Please reach out to us today at compliance.info@widelity.com and let's work together to ensure you are in full compliance.