

April 21, 2025

**Rhode Island Commerce Corporation
REQUEST FOR PROPOSALS**

Solicitation Number: **RFP-2508**

ADDENDUM NO. 3

Update to RFP as well as Partial Questions & Answers

**REQUEST FOR PROPOSALS
BROADBAND INFRASTRUCTURE PROJECTS**

The Rhode Island Commerce Corporation (“Corporation”) seeks proposals to receive funding to design and build broadband infrastructure projects (“Projects”) in Project Areas (“PAs”). The Projects must be completed consistent with the National Telecommunications and Information Administration’s (“NTIA”) Broadband Equity, Access, and Deployment (“BEAD”) Program’s guidance and Notice of Funding Opportunity and Rhode Island’s NTIA-approved Initial Proposal Volumes 1 and 2 (“IP”). Proposers should familiarize themselves with these documents (see Important Links and Guides section below).

A. Prospective Proposers and all concerned are hereby notified of the following change in the Request for Proposals document for the above-listed RFP. This change shall be incorporated in and shall become an integral part of the RFP documents.

1. Appendix B: List of PAUs with Eligible Locations is updated to include PAU 97, available here:

https://assets.simpleviewinc.com/simpleview/raw/upload/v1/clients/rhodeisland/Project_Area_List_04_17_25_1f17a318-ab47-4b28-8a44-5941980acc5c.xlsx.

All other terms and conditions of the RFP shall remain in full force and effect.

B. Questions and Answers

Question #1: Can the Corporation please provide guidance on how to determine which portions of a proposed BEAD wireline deployment qualify as “Incidental Overbuild”? If this involves utilizing parcels, can the Corporation please provide a spatial file (.shp, .kmz, or .gdb) of statewide parcel data? This was publicly available to request from Massachusetts here - <https://www.mass.gov/forms/massgis-request-statewide-parcel-data> - but does not appear to be publicly available from RI. We have reviewed RIGIS - <https://www.rigis.org/pages/municipal-gis-resources> - but parcel data is not available from a single source and the individual municipal websites do not all have parcel data.

Answer #1: The incidental overbuild cap is removed in RFP-2508 – Addendum #2, published on Friday, April 18. The following sentence is removed from RFP-2508: “Incidental overbuild costs cannot exceed 10% of the total project cost.” (RFP-2508 at 5.)

Question #2: PAU 13 includes two island locations that will be expensive to reach with fiber:

- ALBRO ISLAND: 63 FLINTSTONE RD, NARRAGANSETT, RI 02882

- JONATHAN ISLAND: 1 JONATHAN IS, NARRAGANSETT, RI 02882

Can these locations be removed from PAU 13 so that applicants can submit more cost-effective priority broadband proposals for PAU 13?

Answer #2: BSLs 1313459312 & 1313455934 (63 Flintstone Rd, Narragansett, RI 02882 and 1 Jonathan Is, Narragansett, RI, 02882) are removed from PAU 13 and added to PAU 97. PAU 97 can be found at the following link:

<https://assets.simpleviewinc.com/simpleview/raw/upload/v1/clients/rhodeisland/Project Area List 04 17 25 1f17a318-ab47-4b28-8a44-5941980acc5c.xlsx>.

Question #3: In PAU 7, there are 225 acres owned by the Pokanoket tribe in the Mt Hope area of Bristol. The following 5 target locations are in the vicinity, but because we do not have exact boundaries of the tribal land, we are unable to determine if these target locations and/or the proposed fiber route to reach them are within tribal boundaries.

- 300 TOWER ST BLDG 2, BRISTOL, RI 02809
- 301 TOWER ST, BRISTOL, RI 02809
- 303 TOWER ST, BRISTOL, RI 02809
- 2 POKANOKET ST, BRISTOL, RI 02809
- 250 METACOM AVE, BRISTOL, RI 02809

Can the Corporation please identify any targets in PAU 7 that are within tribal lands?

Answer #3: Neither the National Broadband Map nor Rhode Island's BEAD Challenge Process identified unserved & underserved BSLs within the lands of federally recognized Tribes. Geographic boundaries for federally recognized Tribal lands can be found at: <https://www.census.gov/cgi-bin/geo/shapefiles/index.php?year=2024&layergroup=American+Indian+Area+Geography>.

Question #4: In PAU 12, there are 150 acres owned by the Narragansett tribe in Westerly. Though we know the area in question goes by the names Narragansett Tribal Farm, Crandall Minacommuck Farm, and Healing Gardens, we are unable to confirm an exact location in Westerly. There are a significant number of targets throughout Westerly. The entrance to the tribal farm may be on Pound Rd. It may also be on Dunns Corner Rd, in which case there would be about a dozen target locations in the vicinity and/or on tribal lands. Can the Corporation please identify any targets in PAU 12 that are within tribal lands?

Answer #4: Neither the National Broadband Map nor Rhode Island's BEAD Challenge Process identified unserved & underserved BSLs within the lands of federally recognized Tribes. Geographic boundaries for federally recognized Tribal lands can be found at: <https://www.census.gov/cgi-bin/geo/shapefiles/index.php?year=2024&layergroup=American+Indian+Area+Geography>.

Question #5: Under NTIA's BEAD NOFO, the BEAD low-cost service option must be offered to "Eligible Subscribers" at BEAD-eligible locations. See NOFO at 7, 12-13, 67-68. NTIA's definition of "Eligible Subscriber" is determined at the level of an individual household. See NOFO at 12-13. But RFP-2508 says the low-cost option must be offered "to households located in areas in which the percentage of individuals with a household income that is at or below 150 percent of the poverty line applicable to a family of the size involved is higher than the state percentage of such individuals." See RFP at 26. Therefore, it's possible that a household at a BEAD-eligible location could

satisfy NTIA's definition of "Eligible Subscriber" but would not qualify for the RFP's low-cost option if the location is not in an "area[] in which the percentage of individuals with a household income that is at or below 150 percent of the poverty line applicable to a family of the size involved is higher than the state percentage of such individuals." Is the Corporation's eligibility criterion for the low-cost option consistent with NTIA's definition of "Eligible Subscriber"?

Answer #5: In accordance with its NTIA-approved Initial Proposal, the Corporation has specified the BSLs that qualify for the low-cost broadband service option. See the list [here](#). Further information is available in RFP-2508 Addendum #2.

Question #6: Please confirm that the Corporation has adopted and supports all of the relief options provided to BEAD applicants in the NTIA BEAD Letter of Credit Waiver Notice, including those set forth in section 2.4, *Subgrantee Option for Alternative Initial LOC or Performance Bond Percentage*.

Answer #6: Confirmed.

Question #7: Please confirm whether federal prevailing wage laws (e.g., the Davis-Bacon Act) or any Rhode Island or local prevailing wage laws apply to the BEAD-funded broadband deployment projects. If prevailing wage laws apply, please confirm that the Corporation will provide the applicable prevailing wage rates and benefits.

Answer #7: Per the Rhode Island's NTIA-approved Initial Proposal, it is mandatory for all subgrantees (including contractors and subcontractors) to pay prevailing wages and benefits to workers, including compliance with Davis-Bacon and Service Contract Act requirements, where applicable. Rhode Island Prevailing wage requirements can be found [here](#).

Question #8: Does the Corporation intend to adopt in full the exceptions, adjustments, and clarifications to certain provisions of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance), codified at 2 C.F.R. Part 200, and the application of related provisions of the Uniform Guidance to the Broadband Equity, Access and Deployment (BEAD) Program as set forth in NTIA's *Policy Notice: Tailoring the Application of the Uniform Guidance to the BEAD Program* (available [here](#))? If not, please specifically identify each of the elements of the *Policy Notice* that are *not* being adopted by the Corporation. Alternatively, please confirm that the elements of the *Policy Notice* are being adopted in full.

Answer #8: The Corporation will adhere to the provisions as outlined in NTIA's *Policy Notice: Tailoring the application of the Uniform Guidance to the BEAD Program*. Per the NTIA, should this *Policy Notice* and the BEAD award terms differ, the terms and conditions of a specific BEAD award govern.

Question #9: Please confirm that all awards will be considered to be fixed-amount subawards within the meaning of this *Policy Notice*.

Answer #9: Confirmed

Question #10: If the Proposer is not the Internet Service Provider (ISP) of record but instead contracts broadband service delivery to a qualified subcontractor:

- Is the Proposer still required to maintain a NIST-compliant Cybersecurity Framework(per NIST 1.1 and EO 14028), or does this obligation transfer to the ISP subcontractor?
- Specifically:
 - Must both the Proposer and the subcontracted ISP submit separate cybersecurity and supply chain risk management (SCRM) plans?
 - Will the NTIA or the Corporation accept the subcontractor's compliance documentation in lieu of the Proposer's framework if the Proposer is not responsible for operations or data management?

Answer #10: The Corporation requires all Proposers to submit cybersecurity and SCRM plans for the project as a whole.

Question #11: Regarding the required low-cost broadband service offering under RFP 1RFP-2508-BEAD-3.31.25-FINAL: What level of detail is expected in the proposal concerning the marketing, enrollment, and public awareness strategy for the low-cost plan (e.g., \$30/month inclusive service)?

Specifically, does the Corporation require:

- A fully developed marketing campaign, including materials and budget;
- A high-level outreach approach, outlining distribution channels, target demographics, and community partners; or
- An attestation confirming the service will be offered and promoted in accordance with BEAD guidelines?

Answer #11: The Corporation expects any selected Proposer(s) to engage in robust marketing and public awareness of all the available service tiers in order to ensure all residents and businesses at the eligible BSLs are aware of the internet options available. Within the Proposal, the Corporation requests an attestation confirming the service will be offered and promoted in accordance with BEAD guidelines.

Question #12: Is it mandatory for the Proposer to be the Internet Service Provider (ISP) of record responsible for delivering broadband services to end users? Alternatively, may the Proposer subcontract all service delivery to a qualified ISP, provided that all compliance and service obligations under the RFP are met?

Answer #12: The Corporation will accept proposals from Open Access Network owners/operators and from consortiums of network owners and operators. Eligible subgrantees include private entities, local governments, co-operatives, multiparty entities comprised of a combination of public entity members or private entity members including collaborative public private partnerships; all as set forth in Section IV.A. of the RFP.

Question #13: Can you provide a detailed project plan with: the following:

- Specific milestone dates,
- Tangible deliverables at each phase,
- A description of how you track dependencies like permits and third-party approvals?

Answer #13: Proposers are required to submit all information as required in Section IV (Scope of Work) and Section X (Minimum Requirements and Proposal Responsiveness Review). The Corporation does not plan to share an example project plan at this time.

Question #14: Please submit a full cost breakdown showing:

- Direct, indirect, and contingency costs;

- Confirmation that pricing can be modified based on future material or labor rate changes.

Answer #14: Proposers are required to submit all information as required in Section IV (Scope of Work), Section X (Minimum Requirements and Proposal Responsiveness Review). Please also refer to Section IV.B. related to eligible costs. Budget modifications may be made post-award but total award value and project deliverables are fixed. The Corporation does not plan to share an example cost breakdown at this time.

Question #15: Can you provide 3–5 examples of similar broadband deployment case studies we can review for compliance, including

- Number of locations served,
- Delivery timelines,
- Budget adherence;
- Results of any audits by grant authorities?

Answer #15: The Corporation does not plan to share example case studies at this time.

Question #16: Please outline:

- Your expectations in comprehensive risk matrix,
- Associated mitigation strategies,
- A specific project where you successfully overcame major risks without impacting the client's schedule or budget.

Answer #16: The Corporation does not plan to provide an example risk matrix, risk mitigation strategies, or specific project examples at this time.

***End of Addendum ***