# Realizing Opportunity with Broadband Infrastructure Networks (ROBIN)
## Broadband Infrastructure Grant Program
## Frequently Asked Questions
*February 10, 2023*

==*Updated Questions for March 10, on Page 22*==

==*Please note that section 6.3.6.1 of the Grant Program Guidance has been updated*==

**Update to Grant Program Guidance** (previously indicated $132.76):

Section 6.3.6.1.

<u>Monthly cost of service</u>: Applicants are encouraged to ensure that the cost of service for their products is affordable to those they intend to serve. MIHI uses the FCC's Broadband Reasonable Comparability Benchmark tool to compare the applicant proposed service costs for the minimum speed offered to customers to a national standard for the same type of service, (https://www.fcc.gov/economics-analytics/industry-analysis-division/urban-rate-survey-data-resources). Points will be awarded based on the ratio of the proposed cost of the minimum service offering compared to the national benchmark standard published by the FCC for the same level of service. For example, The Broadband Reasonable Comparability Benchmark rate for a connection with a download speed of 100 Mbps and an upload speed of 100 Mbps with unlimited data usage is ==$98.59== per month. The following provides more detail on how this criterion will be scored. Ratio calculations will be rounded to the nearest one-tenth of a percent (0.1%).

==*Please note that section 5.15.2 of the Grant Program Guidance has been updated*==

**Update to Grant Program Guidance** (previously indicated $10M):

Section 5.15.2.

For projects over ==$5 million== (based on expected total cost), the recipient or subrecipient may provide a certification that all laborers and mechanics employed by contractors and subcontractors in the performance of such project are paid wages at rates not less than those prevailing, as determined by the U.S. Secretary of Labor in accordance with subchapter IV of chapter 31 of title 40, United States Code (commonly known as the "Davis-Bacon Act"), for the corresponding classes of laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the State in which the work is to be performed, or by the appropriate State entity pursuant to a corollary State prevailing-wage-in-construction law. If such certification is not provided, a recipient or subrecipient must provide a project employment and local impact report.

### How do I submit an application?

The application can be found at [www.egrams-mi.com/LEO](http://www.egrams-mi.com/LEO). Completed application and supporting documentation must be received via the EGrAMS application portal by 4:00 PM EDT on March 14, 2023, to be considered.

### How will I know if my application is received?

Applicants will receive an email confirmation in receipt of their submission. It is the applicant's responsibility to ensure their submission is received by MIHI prior to the submission deadline. If a confirmation receipt is not received within one business day, applicants must contact Jason Guthaus at [GuthausJ@michigan.gov](mailto:GuthausJ@michigan.gov).

### What areas are eligible for grant funding?

The State of Michigan is not designating geographic areas of the state as officially eligible or ineligible for the grant. It would not be possible for the State to have comprehensive data on all existing and proposed broadband deployment.  Applicants are encouraged to use the ROBIN geospatial tool found at [www.robin.sanborn.com](http://www.robin.sanborn.com) to identify areas of the state for which they are proposing service and demonstrate their unserved nature.   The legislation defines an *unserved area* as one or more of the following:

- A census block or area lacking access to internet service of at least 100 megabits per second downstream and 20 megabits per second upstream from at least one internet service provider.
- An area lacking access to internet service of at least 100 megabits per second downstream and 20 megabits per second upstream from at least one internet service provider according to the Federal Communications Commission's broadband data collection program, upon its completion, or state-level granular maps completed by the Department of Labor and Economic Opportunity.

Areas not eligible for the ROBIN Grant include:

- Areas that are served by at least one (1) broadband provider offering service with a speed of at least 100 Mbps downstream and 20 Mbps upstream;
- Areas where construction of a network to provide at least 100/20 Mbps service is underway, and the construction is scheduled to be completed within one year of the date of the application; or
- Areas where funding for the expansion of service to the location has been committed from a state of federal program for an ISP to deliver at least 100/20 Mbps.

### Will service provided by mobile wireless carriers be considered in determining eligible areas for this grant program?

"Broadband service" is defined as a retail terrestrial service capable of delivering high-speed internet access at speeds of at least 100 Mbps downstream and 20 Mbps upstream. All areas identified as already being served must meet speeds of at least 100 Mbps download and 20 Mbps upload at the network's edge (both outdoor and indoor), measured from stationary user equipment at three feet from ground level with a 95 percent confidence margin for the network area with a uniform network load of 50 percent for the download and upload.

### If an application is considered for funding, but the applicant is requesting $500,000 and only $400,000 is available after all higher scoring applications are funded, does MIHI negotiate with that applicant?

Yes, MIHI will work with applicants to amend the application, project scope, and/or partially fund applications. Similarly, if a portion of a preliminary grant recommendation is successfully objected, MIHI will work with the applicant to amend the scope and/or partially fund the application.

### Are grant preparation costs eligible costs?

Costs incurred prior to the grant award date are not reimbursable. Since the costs to prepare the grant will be incurred prior to the award date, they are not reimbursable.

### Can you give some examples of why applications may not be competitive or not funded?

We encourage applicants to keep in mind the scoring criteria as they complete their application. The scoring is based on the contents of the application and the accompanying attachments, so if the questions are answered completely and the attachments are present, the scoring should follow. Applications that are credibly objected will also not be funded.

### Does the project area need to be contiguous?

No. Proposed service areas are not required to be contiguous, however, they must be reasonably adjacent in a single application. Projects that impact addresses in areas outside of this range should be submitted as separate and complete applications.

### Can grant funding be used to support fixed wireless broadband if the signal enters into a census block that already has limited service?

The ROBIN Grant Program is a technology-neutral grant program. The state recognizes that fixed wireless connections often work well in rural areas where low household density makes wired internet service less feasible. Due to the nature of the technology, wireless signals cannot be

contained to individual addresses or census blocks, and wireless equipment constructed in an unserved area as a result of this grant may extend into areas already served by broadband. The grant can only support connections to homes that are currently unserved by broadband at 100/20 Mbps, and grant applicants proposing a fixed wireless connectivity solution should take care to minimize the wireless signal "bleed" into already served areas of the state.

The ROBIN Grant Steering Committee will make preliminary grant recommendations following the close of the grant application period. These preliminary recommendations will then be subject to a 45-day comment/objection period during which anyone with an interest in the proposed grant project may provide a comment on or object to the preliminary recommendation. If a fixed-wireless-based preliminary grant recommendation "bleeds" into an area already served by broadband and a credible objection is filed and verified by the department pertaining to this "bleed," the preliminary grant recommendation may be adjusted or eliminated from consideration.

### Are local governments eligible to participate in this grant?

The enabling legislation states that MIHI shall not, directly or indirectly, award infrastructure grants to a governmental entity or educational institution, or affiliate, to operate or construct broadband infrastructure. Unless another internet service provider has directly applied for an infrastructure grant in the same unserved area, the Department of Labor and Economic Opportunity may award grants to governmental entities for infrastructure grants only for a public-private partnership, with internet service providers who are contracted to either own, operate, or maintain broadband infrastructure or service in unserved areas. An eligible public-private partnership must demonstrate a competitive bidding process and comply with applicable state laws.

### Can the grant be used for feasibility studies?

Feasibility studies are not eligible under this grant program.

### Can I apply for a federal grant from the FCC or USDA grant or loan programs and the ROBIN Grant funding for the same service area?  If so, could I accept both awards?

You may apply for funding for the same service area if the award has not been made prior to submitting the ROBIN grant application.  If funding is granted prior to the ROBIN grant award, that area would then become ineligible to receive ROBIN funding.  A provider could apply for ROBIN funds for areas that are geographically adjacent to, but not part of, their federally funded deployment obligations that are ROBIN-eligible in order to more fully leverage their federal funding into additional unserved areas of the state.

### What are some examples of acceptable financial documentation?

Applicants should demonstrate their financial viability by providing relevant financial information for the previous three years of business operations. Relevant financial information may include, but is not limited to, annual reports, balance sheets, Form 10-K, Form 10-Q, income statements, and/or audited financial statements. Confidential information may be submitted and can be redacted using the form available upon completion of the application in EGrAMS (prior to submission).

### Can a subsidiary submit financial documentation from its parent company?
An applicant may provide relevant financial information for the parent company or another entity if the applicant is a wholly owned subsidiary of the parent company or entity.

### What is an acceptable GIS-compatible file format?
GIS files can be submitted in .shp, .gdb, .kml, or .kmz file types.

### There is a question that requires a five-year, stand-alone project financial plan/forecast.  Does this mean the cost and revenue in the model addresses only the funded project area or do you want the company financials with the project overlaid on top?
The response to this question should address only the cost and revenue model for the proposed project area.

### Are farms considered businesses?
Farms may be counted as a business.  If multiple dwellings/housing units are located on the property, they may also be included in the household count.

### If the applicant submits a reviewed financial report, would that be acceptable on its own or would they need to include any other types of documents?
An audited financial statement is the preferred form of documentation.  The burden is on the applicant to provide the necessary financial information for the committee to make an accurate determination of their financial wherewithal.  If an applicant submits another form of documentation, such as a "reviewed" financial report, they should indicate who reviewed them, name, title, and organization, and if that review was done in-house or by a third party. This will help interpret the validity of the financial statements.

### If all of the data points are included in the geospatial tool, can you just provide a list of the addresses or specific locations?
The licensing of the address points in the map does not allow us to export and provide the entire dataset outside of MIHI; however, once you have an account and are logged in, you can use the draw polygon and draw shape tools to then extract addresses from within the polygons you draw.

**With regards to the low-cost service option (6.3.6.3), will applicants that have a low-cost option with ACP that's more than $0 (net) receive any points?**
No, either the applicant offers service of at least 100/100 Mbps for $0 (net) and receives full points, or the cost of the service is greater than $0 and no points are awarded.

**Our client would like to inquire about the in-kind match eligibility for costs related to a long-term lease for a switch that routes telephone services and relies on the fiber network. This service is necessary for retaining existing customers and accumulating new ones via this grant program.**
Ineligible expenses for the ROBIN program include, but are not limited to, "expenses related to the provision of telephone or video services which are not necessary for the delivery of broadband services." The grantee would need to provide evidence that the switch is vital and necessary to the deployment of broadband service to the proposed locations, (i.e., the project could not go forward without it), in order for the switch to count as in-kind match.

**If, for example, our client begins a long-term lease for equipment prior to the application date, will the costs be eligible for an in-kind match contribution from the date they start the lease agreement or, would they have to start the lease after the application is submitted? Alternatively, would they have to wait until the grant contract is signed to begin a lease?**
Project expenses and match (cash or in-kind) incurred before a grant agreement is signed are not eligible. In the scenario provided, the grantee would need to provide evidence that the equipment is vital and necessary to the deployment of broadband service to the proposed locations for it to count as match. If the applicant chooses to begin the lease before a grant agreement is signed, the lease value proposed as in-kind match would only apply after a grant agreement is executed.

**Can applicants apply for more than the $60M maximum?**
Yes, applicants can apply for more than the maximum, however, the award(s) will be capped at $60M.

**Can the funding support backhaul/middle mile infrastructure that passes through an ineligible area to serve eligible areas? Or would the costs need to be separated or excluded from the application?**
Yes, as long as the area to be served by the backhaul/middle mile infrastructure is an eligible area.

**Does 100% of the service addresses within a proposed area need to be offered service? For an electric cooperative that is expanding their broadband footprint, while not limited to current**

members, there is a priority to serve members. Additionally serving non-members may have an additional cost that would need to be included in the application cost estimate.

This is a decision for the applicant to make. The ROBIN Application requests a list of the locations to be served by the proposed project. How those locations are distributed is a decision of the applicant.

**We have a client who does fixed wireless and was wondering what the latency requirements are or the program specific to fixed wireless/microwave.**

There is not a specific latency requirement, however, the minimum connection speed to be offered to locations connected through the ROBIN Program is 100/100 Mbps.

**Are there any provisions for limiting or excluding Michigan Property Tax on telecom infrastructure built with Grant awards?**

There are not.

**Is there a time commitment associated with the 100/100 low-cost offering? For example, can it be offered for the first 12 months of service, as is often done in the industry today? And would there be a penalty for an applicant if, after some period of time, they decided to adjust the price and/or eligibility criteria for that service?**

Grantees are expected to offer service at the pricing and speed levels stated in their application for at least one (1) year after grant closeout. After this period, grantees are expected to maintain pricing and speed levels for the ROBIN project area consistent with those found in the grantee's non-ROBIN service areas elsewhere in the state.

**Is there a limit on the number of attachments for a given response? For example, letters of support.**

Some sections only allow one attachment, while others have the capability to accept multiple. For example, you can submit as many letters of support as you would like. Once you fill all five spots and press "Save," another five will be opened up. This is the same for any section that allows for more than one attachment.

**Looking at the map for the Robin grant, there is a couple areas we are going to be building out fiber to within the next year. Also a few locations were missed on the BDC Data and/or we have since build-out fiber to that were not included with the BDC data. Obviously, these locations already or will have Fiber soon and we feel should not be included on the map. What type of data will you need from us to get these areas excluded from the Robin map?**

While these areas would qualify as "unlikely eligible" on the map, we can't equitably add similar areas for other parts of the state given the vast scope of the undertaking required to do so. The

comment/objection process will help prevent any ROBIN funding from overlapping with existing build plans here and in other parts of the state.

**Regarding the redaction process, sometimes the entire response isn't confidential rather certain parts – is there a way to denote that?**
There will be a place for notes when you go through and mark things as confidential and that information can go there.

**In the redaction process, is there a way to mark certain attachments as confidential?**
Please make a note when you mark the confidential sections.

**I see that we can extract a polygon from a targeted area – can users export a list of all Community Anchor Institutions across the state?  Is it possible to export a smaller list of CAIs from a polygon area?**
We don't currently have a list of all the CAIs that are on the map in easily accessible format. The polygon extraction tool does not capture CAIs. We will explore the opportunity of publishing a list of the CAIs on the map separately to help with grant decision making.

**How does an agency go about starting multiple applications?**
In EGrAMS, go to the Project Director tab and select Start a New Application. On the next screen select ROBIN as the Grant Program and click OK. You will then be given multiple lines to number and name additional applications.

**When I look at the PDF template of the EGrAMS application I see some duplicated sections. Are we going to need to complete these sections twice?**
The reason you are seeing some duplication is because the PDF combines both middle and last mile sections of the application. Once an applicant selects either last or middle mile, one of the duplicate sections will be excluded from the application.

## *February 3, 2023*

**If a client is currently covering a portion of an QOZ that is showing as ineligible locations on the map, and their proposed service area is covering the remaining portion of the QOZ, will the client receive the full 10 points?**
If their proposal includes all of the likely eligible locations in a QOZ then they would get the full points.

**Our grant will be on behalf of a PPP. What documentation needs to be submitted to verify that the PPP is formed, beyond proof of a competitive bid process?**
Please provide a partnership agreement, a memorandum of understanding, a contract, or a similar document that was executed between the parties as a result of the bid process.

**In the FAQ: "Unless another internet service provider has directly applied for an infrastructure grant in the same unserved area, the Department of Labor and Economic Opportunity may award grants to governmental entities for infrastructure grants only for a public-private partnership, with internet service providers who are contracted to either own, operate, or maintain broadband infrastructure or service in unserved areas." My question: does another application need to be submitted in order for a PPP to be considered for funding, or if another ISP applies, a PPP application would not be eligible?**
This language is from Public Act 53 of 2022 that created the ROBIN Program. If a governmental entity is to be the recipient and fiduciary of a ROBIN grant in partnership with an ISP, it must be for an unserved area that has not been applied for by another ISP on their own. If there is overlap between a governmental entity application and an ISP application for the same unserved area, the ISP application would receive preference and the governmental entity application would not be eligible. However, an ISP may be the recipient and fiduciary of a ROBIN grant in partnership with a governmental entity. In this instance, the preference would not apply as the private ISP is the recipient and fiduciary, not the governmental entity.

**When this section says "encouraged to offer minimum speeds that are faster than the 100/100 Mbps minimum requirement." Does that mean for maximum points we must offer only a gigabit plan?**
Offering plans at varying speeds helps provide options for households. Some of the criteria, such as the relative cost of service, will be scored based on the information provided at the 100/100 Mbps speed tier as this is the minimum speed required to be built with ROBIN funds. For the criteria related to higher speeds, an applicant would receive the full points in this category if they offer a speed tier to customers of 1/1 Gbps. This criteria is designed to encourage applicants to provide speeds faster than the minimum.

**We had a quick question about how a project will be scored based on the size of the project. Will the point value for the project be assigned according to the amount of eligible locations or total locations? For example, to get 15 points for a 2,500 location project, do the 2,500 locations all need to be a combination of likely eligible unserved (green dots) and likely eligible underserved (blue dots), or could there be 1,000 likely ineligible (black dots) combined with 1,500 likely served and underserved?**

It would be a combination of the likely eligible locations, no likely ineligible (unless you have reason to believe those locations have been incorrected labeled as such).

**Do we have to list any other address beside the one listed as unserved or underserved within our GIS proposed territory? If so, can we find the address in the ROBIN application.**

We changed some backend settings on the ROBIN map to allow you to export all the addresses within a polygon. The CSV file will then list whether the location is likely or unlikely eligible or if it's status is unknown, (due to the fabric issues with the FCC data, this is a likely outcome in some places). For the addresses proposed for service in your application, please only include the locations that you propose to serve that you believe are eligible to be connected through the ROBIN Program, (i.e., those locations that do not currently have 100/20 Mbps service available).

**Do you have any samples or boilerplate language of resolutions for local units desiring to authorize such a match?**

We do not have a template or boilerplate language as a guide, but any kind of official resolution, MOU, agreement, etc. that is signed by both parties would be evidence of the match commitment.

**Section 5.15.2 mentions prevailing wage and collective bargaining agreements.  The way I read this, paying prevailing wage and having collective bargaining or other labor agreements is not required as they use the term "may", but then it requires us to file a project employment and local impact report and a project workforce continuity plan. How can I find out what those reports/plans are and what will be required? And verify whether or not we will be forced to pay our employees or our underground contractors to pay their employees a higher wage than they normally would?**

These certifications (or reports) must only be addressed if the total project costs are over $5 million. Certification of a prevailing wage and labor agreement is not an absolute requirement, however, in absence of these certifications being submitted; the corresponding reports addressing the bulleted items below must be submitted with the application.

This information is per the CPF Compliance and Reporting Guidance (p. 9) from the US treasury website. https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/capital-projects-fund

*RE: Certification of prevailing wage payment*

If such certification is not provided, a Recipient must provide a project employment and local impact report detailing:

- The number of contractors and sub-contractors working on the Project;

- The number of employees on the Project hired directly and hired through a third party;
- The wages and benefits of workers on the Project by classification; and
- Whether those wages are at rates less than those prevailing

Recipients must maintain sufficient records to substantiate this information upon request.

*RE: Certification of project labor agreement*

If the Recipient does not provide such certification, the Recipient must provide a project workforce continuity plan, detailing:

- How the Recipient will ensure the Project has ready access to a sufficient supply of appropriately skilled and unskilled labor to ensure high-quality construction throughout the life of the Project, including a description of any required professional certifications and/or in-house training, registered apprenticeships or labor-management partnership training programs, and partnerships like unions, community colleges, or community-based groups;
- How the Recipient will minimize risks of labor disputes and disruptions that would jeopardize timeliness and cost-effectiveness of the Project;
- How the Recipient will provide a safe and healthy workplace that avoids delays and costs associated with workplace illnesses, injuries, and fatalities, including descriptions of safety training, certification, and/or licensure requirements for all relevant workers (e.g., OSHA 10, OSHA 30);
- Whether workers on the Project will receive wages and benefits that will secure an appropriately skilled workforce in the context of the local or regional labor market; and
- Whether the Project has completed a project labor agreement.
    - Whether the Project prioritizes local hires.
    - Whether the Project has a Community Benefit Agreement. Recipient must provide a description of any such agreement.

## Do the provisions of the Coronavirus Capital Projects Fund allow for a strictly municipal project to submit application for funds?

Municipal projects must be part of a public-private partnership according to state enacting legislation. Public Act 53 of 2022, section 359: *(4) Except as otherwise provided in this subsection, the Department of Labor and Economic Opportunity must not directly or indirectly award infrastructure grants to a governmental entity or educational institution, or affiliate, to operate or construct broadband infrastructure. Unless another internet service provider has directly applied for*

*an infrastructure grant in the same unserved area, the Department of Labor and Economic Opportunity may award grants to governmental entities for infrastructure grants only for a public-private partnership, with internet service providers who are contracted to either own, operate, or maintain broadband infrastructure or service in unserved areas. An eligible public-private partnership must demonstrate a competitive bidding process and comply with applicable state laws.*

**How will application reviewers determine the proportion of unserved locations to be served compared to the total number of locations to be served in an application?**
Applicants are required to include a spreadsheet of their proposed locations to be served as part of their application. This spreadsheet should include the full address (number, street, city, state, zip), location type (residential, business, institution, other), latitude and longitude (if available), and whether the location is currently unserved (i.e., has no service at 25/3 Mbps) or is currently underserved (i.e., has no service at 100/20 Mbps). Application reviewers will total the number of proposed unserved and underserved locations to determine the proportion that are unserved for scoring purposes.

## *February 10, 2023*

**If my application and project budget is based on non-prevailing wage labor, do I need to provide the project workforce continuity plan and employment and local impact report at the time of application submission, or is this a requirement that would need to be met after the grant is awarded?**
You would not need to provide those documents at the time of application; however, you will need to if you are awarded a grant.

**Can American Rescue Plan Act funds be used as the required 15% match to the ROBIN Grant?**
The ROBIN grant does not have any restriction regarding the use of ARPA funds for match, so long as there is nothing on the ARPA side that would prevent it.

**Our company has multiple projects under construction –thinking ahead to the objection period, would you please advise what information will be needed to demonstrate construction underway?**
To facilitate the vetting process of an objection based on planned service expansion, objectors are encouraged to provide additional evidence of planned service, including but not limited to examples of financial commitment to the project such as letters of credit (or similar), engineering designs of the network in the proposed service area (or similar), tower lease agreements, pole attachment agreements, feasibility studies, consumer surveys, bills of lading for project materials or other ordering documentation (or similar), description of any local, county, state, environmental, historic,

architectural, or archeological permits (or similar) that are needed and have been obtained for the network in the objected area.

**Is there a place we can upload additional documents for specific section of the application? For example, under the Organizational Experience section it only allows 250 words. Is there a place we could upload an additional document to provide more details?**
Only the questions/fields that indicate there is an attachment have that capability, otherwise you will have to follow the word limit. In those instances, we are simply looking for concise answers. We know that, if given the opportunity, applicants could certainly provide much more detailed responses and far exceed 250 or even 400 words.

**The application requires a document to be uploaded for evidence of network scalability, can you provide some examples of what is being requested?**
In the past, applicants have provided information from the manufacturers of their electronics that show the scalability of the network to support anticipated future demand and throughput. Knowing the capacity and scalability of any customer premise equipment would be helpful as well. In general, any information about the project that shows how the network can scale to support future demand and throughput is helpful.

**Do you have a copy of the affidavit to submit in the portal that is requested for proof of one-year commitment to pricing?**
We do not have a template or sample, however, a simple statement that confirms the applicant's intention to follow this rule of the program for the required time period that is signed by an officer of the company will work.

## *February 17, 2023*

**Can you provide clarification about reasonably adjacent locations?**
Unserved areas/locations to be connected within a single application should be reasonably adjacent to one another. The intent is to ensure the efficient deployment of network infrastructure and to encourage local, community partnerships and support for proposed projects. Applicants should provide an explanation as to why the project area(s) within their application were defined as such, the benefits and efficiencies gained from defining the areas to be served in such a manner, and any other details pertinent to the geographic selection of unserved locations to be served by the project.

**I am inquiring as to whether there is any guidance on what would qualify for an exception to the published eligibility criteria in general, but more specifically, if project location is potentially a part of that consideration (Areas served by at least one (1) broadband provider offering 100/20; Areas where construction of 100/20 Mbps service is underway; or Areas where funding for the expansion of service to the location has been committed from state/federal program).**

Per Public Act 53 of 2022, the ROBIN Program cannot fund the deployment of high-speed internet service to 1; locations served by at least one (1) broadband provider offering 100/20 Mbps; 2) locations where construction of 100/20 Mbps service will be complete within one year; or 3) locations where funding for the expansion of service to the location has already been committed from state/federal program. There are no exceptions to these restrictions.

The MIHI Office has created a map that shows locations that are "likely" eligible for the ROBIN program based on several state and federal data sources. The map of "likely" eligible locations is meant to provide general guidance to applicants in the design of their applications. The locations identified on this map are not an authoritative or final list of locations eligible for the program as the MIHI Office recognizes that the availability data used to determine whether a location is "likely" or "unlikely" eligible has not been updated by the FCC since its first publication in November 2022 and the connectivity reality of these locations may vary at a local level.

Applicants are free to propose any location for service in their ROBIN application if they believe the location is eligible per the restrictions outlined in PA 53 of 2022 as stated above. Applicants should provide evidence and explanation of the unserved nature of their proposed locations to help MIHI determine if the locations are eligible for the program. After review and scoring, applications that are selected for Initial Grant Awards will be published on the MIHI website. The locations proposed for service in the Initial Grant Awards will be open to the 45-day ROBIN comment/objection process. This process ensures that locations proposed for funding through the ROBIN program are eligible per the restrictions outlined in PA 53 of 2022 as state above. Locations that are successfully challenged following thorough validation will be removed from an applicant's Initial Grant Award and projects will then be adjusted thusly.

**When it comes to challenges/ contesting applications, will the MIHI Office use the speed information on the FCC Maps from Sept 2022, or the ones set to be released on March 1, 2023?**

Knowing that the maps are imperfect tools, we have a team that will go into the field to check speeds and verify infrastructure during the challenge process as needed.

I have reached the point of adding multiple applications. When I start the new application, I am asked to provide a Project Number. Is this done at my discretion? Can I label them 1, 2, 3, etc. or is there a standard number like ROBIN 23?

You can name subsequent applications in whatever manner makes sense, as the project number is for your internal tracking purposes only.

Is there a way to rename the different applications or change the project number after I have started them?

Go to *Project Director > Start a New Application*. Next select *Edit > Find*. The applications you have started should come up and allow you to change the name. Select *OK* when you're finished.

In the guidance document it states that initial designs need to be signed off by a licensed engineer. I just want to clarify the licensed engineer is a P.E., correct?

Yes, the licensed engineer is to be a P.E.

How is the bidders 15% match treated during the term on the grant? For example, when we submit invoices for reimbursement is 15% subtracted/invoice or is it a letter of credit or other?

Match contributions will be tracked during the grant performance period to ensure match requirements are met. Match requirements can be met with cash, in-kind contributions, or a combination thereof and can include any eligible project expense incurred between the Effective Date and the end of the project or December 31, 2026, whichever is earlier.

Are there financial history waivers accepted for applicants with less than three years of operation?

Applicants' financial wherewithal will be reviewed and scored relative to the documentation requested and submitted in their application. While there is no explicit waiver of the three years of financial information, and no guarantee of acceptance, reviewers can consider submitting other supporting documentation that addresses the financial wherewithal of the applicant and their ability to successfully fulfill program requirements. Applicants providing additional or alternative financial information should provide a detailed explanation of the information submitted and why the requirement as stated in the program guidance could not be met.

Can multiple ISPs partner with a municipality in an application?

Yes, applications are not limited to a single ISP. Multiple ISPs could partner with a municipality for the ROBIN Grant Program.

**Can you please clarify the "speed of service" scoring criteria? There has been some confusion around this section.**

The "speed of service" scoring criteria was originally written to encourage applicants to provide faster minimum, or base, speeds to customers in areas newly connected with ROBIN funds. However, after fielding several questions regarding this criterion, this section has been revised to incentivize applications that offer high-speed connections to customers but also a variety of services to accommodate customer needs, (while still providing the minimum required speed of 100/100 Mbps). For this criterion, applicants that offer 1Gbps/1Gbps connections would receive the maximum points per the revised table in the ROBIN Program Guidance.

The "speed of service" criteria is related to the "monthly cost of service" criteria found in section 6.3.6.1 of the ROBIN Program Guidance. No revisions were made to this section, for clarification, however, applicants will be scored based on the cost of service for the minimum speed offered to customers. For example, if applicants offer the minimum required speed of 100/100 Mbps to customers at a cost of $70 per month with no data cap, the applicant would receive seven (7) points in this section as $70 is approximately 71% of the FCC Benchmark of $98.59 for the same service offering as calculated using the FCC 2023 Broadband Benchmark Calculator that can be found here: https://us-fcc.box.com/v/URSUSBenchmarkCalculator.

**Regarding the "no-cost w/ACP" 100/100 service weighting factor for ROBIN grants - Can its eligibility requirements be more restrictive than the ACP requirements?**

The intent of the "no-cost w/ACP" service is that eligibility requirements would match those of the Affordable Connectivity Program or be more inclusive, not less.

**Is there a minimum time commitment requirement associated with the 100/100 low cost offering? For example, can the initial commitment be limited to the first 12 months of service, as is often done in the industry today?**

All grantees are required to maintain the speed and cost structures identified in their grant proposals and agreements for a period of at least one year following the successful closeout of their grant project.

**Are there any other requirements and/or preferences for this "no cost" service that are not explicitly stated in the ROBIN guidance?**
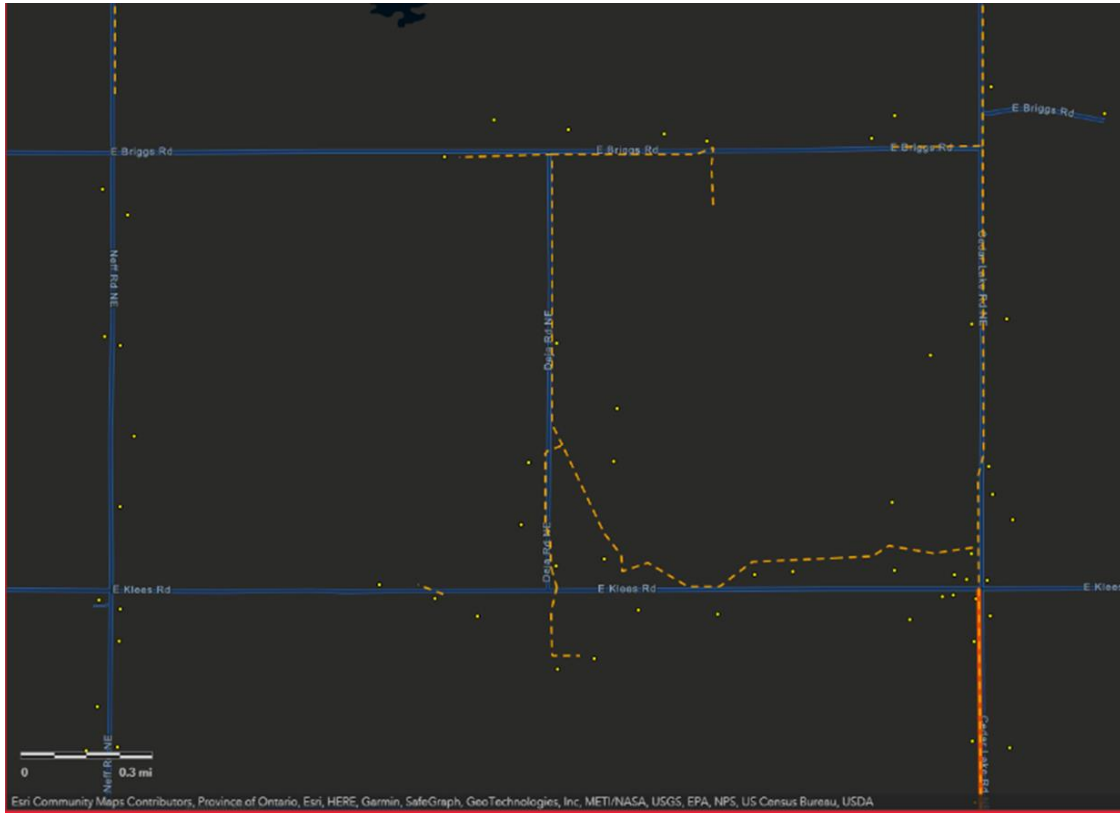
The intent with the "no-cost w/ACP" service is to ensure that new connections are affordable to ACP-eligible households and further encourage adoption of the newly available service funded by the ROBIN program. The intent is to ensure that households, no matter their income, are able to experience the benefits of high-quality, high-speed internet service.

### Is there a Broadband Reasonable Comparability Benchmark for Business Rates? Are there requirements or scoring points associated with Business Rates?

There is not a comparability benchmark for businesses. The scoring for cost is associated only with the rates for households, not businesses.

### Are applicants required to provide the entire proposed infrastructure to be deployed plus the fiber route locations or would a sample of the proposed infrastructure plus fiber route location be suffice?

MIHI would like to see the entire proposed infrastructure routes for the project. The geospatial file(s) representing these routes do not need to be to exact engineered specifications but rather an approximation of the routes the infrastructure will take to serve the proposed locations. Individual drops are not necessary in the requested geospatial file. An example is shown in the screenshot where the dashed lines represented the proposed routes to expand into this community and the yellow dots represent locations to be served.

### What are you looking for with "evidence of eligibility"?

Applicants should provide any evidence they feel will show reviewers that they meet one of the three types of eligibility criteria. Examples could include any licensing documents, company history, evidence of when broadband service was first offered in the state, etc.

### How can we show that we participate with ACP?

Application reviewers will be checking the list of ACP participating providers published by the FCC, but applicants are encouraged to provide any confirmation of participation received from the FCC or otherwise, that can demonstrate their participation.

### Where should letters of support be directed?

Letters of support are to be attached within the EGrAMS application.

## *February 28, 2023*

### Are areas funded by programs such as Alternative Connect America Cost Model (ACAM) or the Connect America Fund (CAF) Phase II Auction eligible for ROBIN Funding?

The MIHI Office received clarifying guidance from the U.S. Treasury on this topic on February 28, 2023. U.S. Treasury encourages states to prioritize projects in areas not currently served by a wireline connection that can reliably deliver at least 100/20 Mbps. Therefore, if a potential subrecipient (ROBIN Program applicant) proposes to invest ROBIN funds in areas in which ACAM or other federal funding was used to invest in fiber or other wireline technology – even if the recorded speeds are lower than 100/20 Mbps - this may lead to duplication of federal funds; a situation impermissible with ROBIN funds.

ROBIN applicants that include locations unserved at 100/20 Mbps in their application that are within areas funded by ACAM or other similar programs must ensure that the use of ROBIN grant funds are done so in a complementary manner and that there is an additional public benefit and justification for investing ROBIN funds in areas where an investment was previously made with federal funds. Applicants proposing such locations in their applications will be required to demonstrate that ACAM or other similar dollars were not used to deploy fiber to the locations targeted for ROBIN funds and/or that it is impossible to achieve at least 100/20 Mbps from the ACAM or other similar federal investment.

After the ROBIN grant application window closes on March 14, the MIHI Office will determine if applications contain locations within ACAM or other similarly funded areas. The MIHI Office will contact impacted applicants and those applicants will be required to provide MIHI with the

justification for deploying ROBIN funds in areas previously funded by federal investment per the guidance described above.

## March 3, 2023

**With regard to community support and customer/community interest - how are you differentiating between the two? What documentation should be provided?**
Community support is intended to focus on partnerships created with various entities within the community in which the project is proposed. This could be in the form of a formal partnership with a local government, letters of support from impacted communities, etc. Community interest is more focused on individual consumers that may benefit from the project. Often, community surveys or provider-led surveys will show a willingness to subscribe if service were available. Surveys from residents would show interest in the project from consumers while community support shows broader support from various local governments or similar entities.

**What happens if we apply for projects in three counties and another applicant is awarded for a project that covers one of those counties? Is this an "all or nothing" process where our application would no longer be considered?**
Applications will not be treated as "all or nothing." If another ISP scores higher and receives funding for an area that was included in your application, we would still be able to consider the remaining portion of your application and can reduce the award proportionally from what was requested.

**I am working in the Project Costs and Budget section of the application and the boxes are grayed out and I can't enter any information, what do I need to do?**
The table on the Project Costs and Budget page will populate as you complete the Budget Summary table on the next page.

**We have entered our residential rates in the application, but also have a slightly different Business rate plans. How would you like these shown to differentiate residential from business rate plans?**
The scoring for cost is associated only with the rates for households, not businesses.

**How are you all thinking about the timeline checkboxes on the Project Schedule? If engineering is going to start 7/1/23, and end 2/1/25 should I be selecting all of the checkboxes between those dates? Or should I be checking one for the start and one for the end?**
Please select all of the boxes from the start through the end of the task.

Regarding reimbursement, our understanding is the grant is funded on a reimbursement-only basis. So, while estimated costs are a consideration, the grant is mainly a commitment to a scope of work, service passings offered, and matching percentage? This question has come up in developing our cost estimates and understanding how changes is cost during implementation would be addressed, specifically cost overruns. We are mitigating the risk of material pricing increases with appropriate escalation and contingencies in our estimates. If reimbursement will be made on eligible costs (within scope, procured correctly, etc.), the cost risk to the applicant would be reduced and may impact our estimates. Also, can you confirm if the total project costs proposed in the application will be capped? For example, would is a $50M project capped at $50M regardless of if eligible costs exceed $50M? Would it be capped at $60M?

MIHI recognizes the fluctuations that can occur within the supply chain in this industry, however, grant awards cannot be increased once a grant agreement is in place.

For the *Monthly Cost of Service* criteria, 100/100 Mbps is used as an example, will this be the speeds used to determine point awards? Or will all the service offering speeds by the applicant be evaluated against the benchmark and them points awarded on the average? Or prorated in some way?

The *Monthly Cost of Service* will award points based only on the customer cost of service at the minimum speed offered by the applicant which must be at least 100/100 Mbps.

Will ROBIN fund an area that's been tentatively awarded RDOF Funding, but the carrier hasn't received final authorization?

The awarding of RDOF funds still represents an enforceable federal commitment for deployment even if the RDOF winner has not received final authorization. If an RDOF winner's application has been rejected by the FCC or if an RDOF winner has defaulted on some of their previously awarded RDOF census blocks, those areas would be eligible for funding. MIHI is seeking further guidance on this issue from the U.S. Department of the Treasury.

How are the attachments to be labeled? On page 3, under 2.3 it states it should be labeled by organization name, project name, attachment name and file type. But on page 18, under 7.2 it states it should be labeled by organization name, attachment number and file type.

The attachment naming instructions were left over from the previous grant (CMIC) that ROBIN was designed after, when everything needed to be submitted via email. Since everything is included within the EGrAMS platform now, the naming is much less important. We would just ask that you be consistent in your naming for all attachments within your application.

**If a State and/or Federal Environmental Review or Permits were required and if any Historic, Architectural, Archaeological review, approvals or permits were required, is the approval of any of these items required prior to applying for the funding?**

Here is how permits and reviews are addressed in our Program Guidance in the Project Readiness section:

*Demonstration of project readiness: Demonstration of an applicant's project readiness include, but are not limited to, an engineering and design plan signed and stamped by a licensed engineer, evidence that financing is secured, permits identified and secured, other approvals secured or in process (e.g., environmental, historic, etc.), thorough and complete project schedule, other evidence of readiness to build, manage, and operate the project.*

**What constitutes "Evidence of job creation" to be uploaded. We can supply a description and account of direct job creation, but not sure what you would like to see as "evidence" of such.**

For example, businesses or industries that have committed to hire and create new jobs as a result of the project being completed. Direct job creation related to the deployment of connectivity is often rare, but it can occur. Applicants are encouraged to have those conversations with local employers and institutions that may create new jobs as a direct result of their new connectivity. In such cases a letter or statement from applicable employers would be sufficient.

**Section 6.3.3.3 requests evidence of economic impacts of projects, including direct economic expansion or indirect impacts, or direct job creation. Can any further illustration or clarification be provided regarding how this information might be presented?**

Applicants should provide any objective data that an infrastructure grant will demonstrate economic impact and economic development efforts that will directly support job creation in the areas proposed for deployment. This could be in the form of direct job creation statements from local businesses, large employers, or institutions. Applicants could also provide data on the economic impact for households that may be realized with the newly deployed service, or other similar data to demonstrate the economic impact the project would have on the local community.

**As a threshold matter, might there be any guidance or suggestions as to how many points, out of the maximum of 250, might be needed for an application to be viable? Any kind of approximation or examples, however conditional, would be helpful.**

At this point, it is incredibly uncertain. We estimate that we could see three times the available funding in requests, and as such, it would be a highly competitive process.

*March 3, 2023*

**Can one ROBIN application be dependent on the award of another ROBIN application? For example, can a last mile ROBIN application be dependent on the award of a middle mile ROBIN application?**
ROBIN applications should be able to stand on their own without being dependent on the award of another ROBIN application. If this is not possible, both applicants should note this dependency in their applications.

**Is it acceptable to include URLs or hyperlinks directly int the narratives in EGrAMS?**
Any information you would like considered with you application must be included as an attachment and not via hyperlink.

**I read that you must submit a Confidential Treatment form to finalize the redaction process, is that correct?**
The reference to Confidential Treatment forms was inadvertently left from a previous grant program. The redaction process in EGrAMS eliminates the need for an additional form.

**Are initial plans that show adequate capacity to deliver services at promised levels sufficient? Can you provide and clarification regarding the level of detail that is sought?**
The level of detail in the preliminary engineering plans should be sufficient that a PE would be able to the information necessary to determine that the design can deliver the services to the proposed locations at the proposed speeds. Applicants are highly encouraged to have their preliminary plans stamped and signed by a licensed PE. Applicants will not receive full points in the Demonstration of Project Readiness section without engineering and design plans stamped by a licensed engineer, however, partial points may be awarded.

**Are there any resources, perhaps through the ROBIN map or other data sets, that would help an applicant distinguish between residential, business, institution or other addresses?**
The FCC BDC data has designations for residential and business locations. While the ROBIN map does not contain this information, the FCC data could be source for identifying and differentiating location type.

Are there any resources available that would help identify CAI locations? I realize CAIs are identified on the ROBIN map, but not at the address level to the best of my knowledge.

MIHI has posted a GIS Shapefile of several Community Anchor Institution types across the state. The Shapefile can be downloaded and incorporated into local GIS systems to identify CAIs in project areas: [LEO - Infrastructure and Digital Inclusion Funding Opportunities (michigan.gov)](). The file is the second bullet from the bottom on the ROBIN website.