INTERNET FOR ALL

NTIA Broadband Grant Funding for Alaska

November 1, 2023

Welcome!

NTIA Broadband Grant Funding for Alaska

National Telecommunications and Information Administration

Amanda Pereira
Environmental Program Officer
Office of Internet Connectivity and Growth, NTIA
Phone: 202-834-4016
apereira@ntia.gov

Jill A. Springer
Senior Policy Advisor for Permitting
Chief Environmental Review and Permitting Officer
Office of Internet Connectivity and Growth, NTIA
Phone: 202-430-3921
jspringer@ntia.gov

DRAFT | PRE-DECISIONAL

Agenda

Overview of Internet For All Grant Programs

The National Telecommunication and Information Administration

INTERNET FOR ALL

The National Telecommunications and Information Administration (NTIA) is the President's principal advisor on telecommunications and information policy issues.

GOALS OF NTIA

Expanding broadband access and adoption

Expanding the use of federal spectrum

Ensuring the Internet remains an engine for continued innovation and economic growth

The **Internet For All Initiative** is key to helping NTIA accomplish its agency directive and the Administration's goal to **expand affordable and reliable high-speed Internet access** to everyone in the United States.

DRAFT | PRE-DECISIONAL

Internet For All Initiative Overview

The Internet For All programs are funded across two key pieces of legislation that authorized federal agencies to create programs to support high-speed Internet planning, infrastructure, and adoption.

CONSOLIDATED APPROPRIATIONS ACT (2021)

The Consolidated Appropriations Act of 2021 directed NTIA to create the Office of Minority Broadband Initiatives (OMBI) within the Office of Internet Connectivity and Growth (OICG) and to administer three broadband funding grant programs:

- Broadband Infrastructure Program (BIP): $288M

- Tribal Broadband Connectivity Program (TBCP) Round 1: $2B

- Connecting Minority Communities Pilot Program (CMC): $268M

BIPARTISAN INFRASTRUCTURE LAW (2021)

The Bipartisan Infrastructure Law (BIL) was a $1.2T bill signed into law on November 15, 2021. BIL invests $65B into high-speed Internet efforts through 7 federal programs:

NTIA PROGRAMS

- Broadband Equity, Access and Deployment Program (BEAD): $42.45B

- Digital Equity Act Programs: $2.75B

- Tribal Broadband Connectivity Program (TBCP) Round 2: $1B
- Enabling Middle Mile Broadband Infrastructure Program: $1B

OTHER FEDERAL PROGRAMS

- USDA ReConnect Loan and Grant Programs: $2B

- FCC Affordable Connectivity Program: $14.2B

- Private Activity Bonds: $0.6B

DRAFT | PRE-DECISIONAL

Providing affordable and reliable Internet For All

INTERNET FOR ALL

The Internet For All programs administered by NTIA will provide more than $48 billion for infrastructure deployment, skills training and access to technologies for communities across the United States.

NTIA administers six broadband grant programs to provide **affordable & reliable high-speed internet access for all**.

The Internet For All programs represent **a historic investment** in connecting all Americans **through infrastructure deployment** for high-speed Internet.

Additionally, the grant programs provide resources for historically underserved communities to **advance digital equity** and **bridge the digital divide**.

NTIA's GRANT PROGRAMS

Broadband Equity, Access and Deployment Program (BEAD)
Eligible Entities: States and Territories — **Amount: $42.5 B**
Funds planning and execution of competitive broadband subgrants to deploy infrastructure and promote accessibility and equity

Middle Mile Deployment Grant Program
Eligible Entities: Internet Service Providers — **Amount: $1 B**
Encourage expansion and extension of middle mile infrastructure and promote resiliency

Tribal Broadband Connectivity Program (TBCP)
Eligible Entities: Tribal Entities — **Amount: $3 B**
Expand access to high-speed internet access and adoption on tribal lands.

Broadband Infrastructure Program (BIP)
Eligible Entities: Covered Partnerships (State & ISP) — **Amount: $288 M**
Funds broadband infrastructure deployment in unserved areas, especially rural areas

Digital Equity Act Programs
Eligible Entities: States and Territories — **Amount: $2.75 B**
Promote achievement of digital equity, support digital inclusion activities, and broadband adoption

Connecting Minority Communities (CMC) Pilot Program
Eligible Entities: Community Anchor Institutions — **Amount: $268 M**
Support purchase of broadband service, equipment and devices, and hiring/training of IT personnel at community anchor institutions (CAIs)

Includes infrastructure deployment

DRAFT | PRE-DECISIONAL

Internet For All | Program Status

NTIA's Internet For All programs currently range from planning stages to open application periods and some awarded grants.

Program	Funding Source	Status
Broadband Equity, Access, and Deployment (BEAD) Program	Bipartisan Infrastructure Law	Planning Grant Awarded, Accepting Initial Proposals
Broadband Infrastructure Program	Consolidated Appropriations Act, 2021	Awards Funded
Connecting Minority Communities Pilot Program	Consolidated Appropriations Act, 2021	Awards Funded
Digital Equity (DE) Act Programs	Digital Equity Act	Planning Application Submitted for State DE Planning Grant Program; Additional Awards Forthcoming
Enabling Middle Mile Broadband Infrastructure Program	Bipartisan Infrastructure Law	Awards Funded
Tribal Broadband Connectivity Program	Bipartisan Infrastructure Law & Consolidated Appropriations Act, 2021	Awards Funded for Round 1; Accepting Applications for Round 2

Conceptual Timeline for Broadband Permit Applications

The highest volume of permitting activity is anticipated for projects funded by the BEAD Program. BEAD projects are expected to begin execution in 2024, with permitting activity expected to reach its peak in 2026-2027.
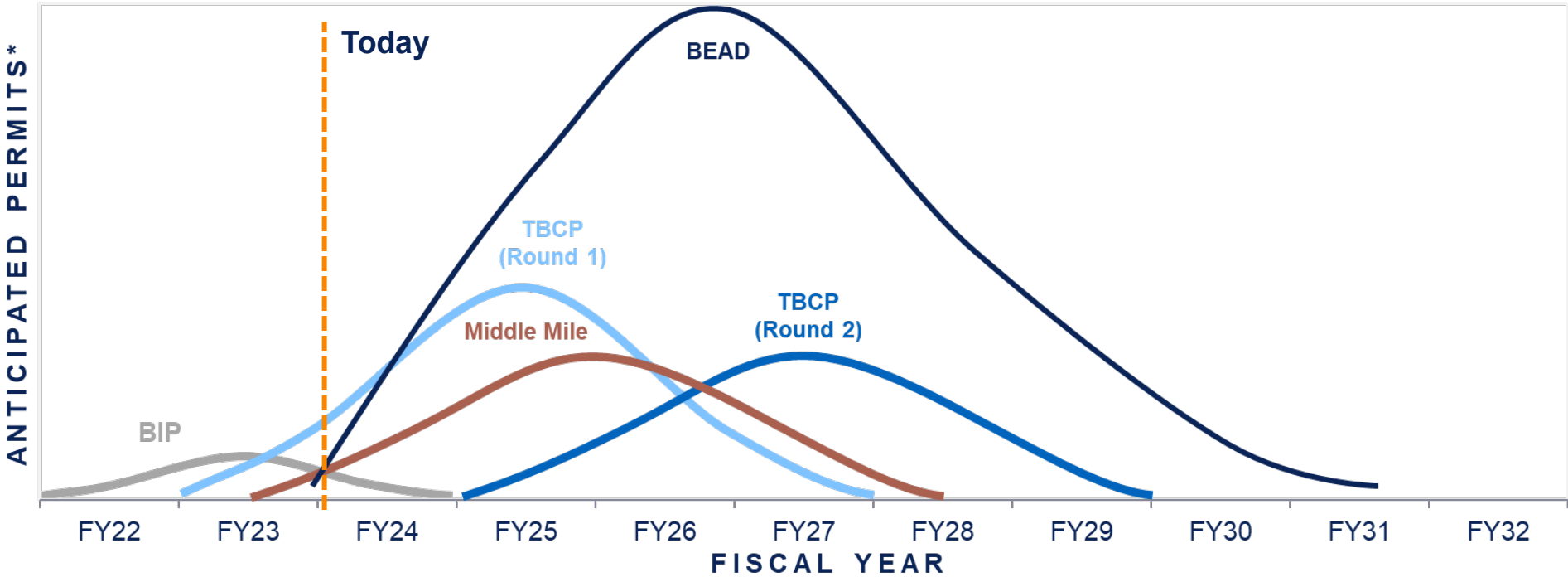
Permitting requests and processes across infrastructure programs, including broadband, will have compounding effects on federal resource management agencies, requiring greater resources to meet permitting needs.
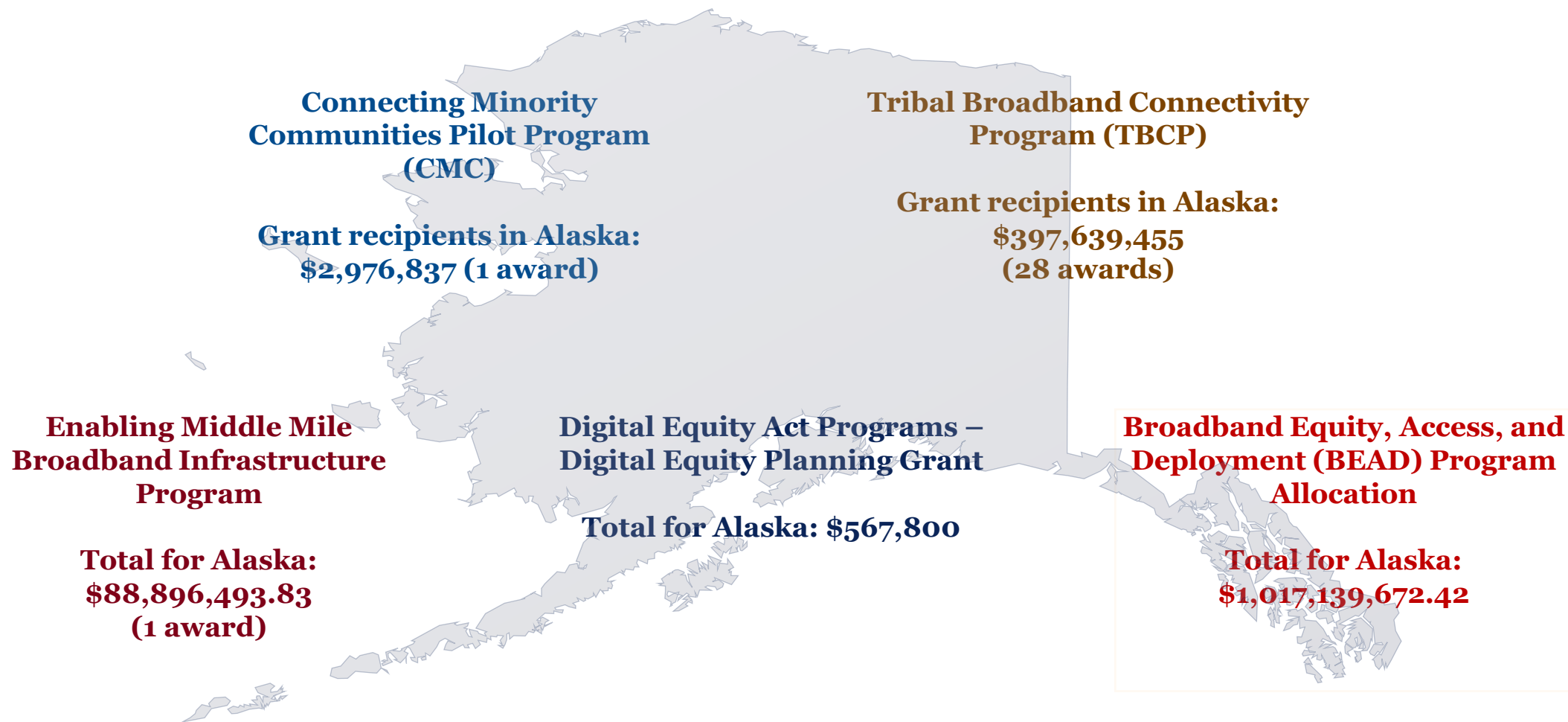
Note: This timeline is conceptual in nature and not intended to depict accurate permitting magnitude.

DRAFT | PRE-DECISIONAL

NTIA Grant Program Funding for Alaska

NTIA broadband grant programs include the following approved for Alaska or for grantees located in Alaska:

Connecting Minority Communities Pilot Program (CMC)

Grant recipients in Alaska: $2,976,837 (1 award)

Tribal Broadband Connectivity Program (TBCP)

Grant recipients in Alaska: $397,639,455 (28 awards)

Enabling Middle Mile Broadband Infrastructure Program

Total for Alaska: $88,896,493.83 (1 award)

Digital Equity Act Programs – Digital Equity Planning Grant

Total for Alaska: $567,800

Broadband Equity, Access, and Deployment (BEAD) Program Allocation

Total for Alaska: $1,017,139,672.42

DRAFT | PRE-DECISIONAL

Broadband Equity, Access, and Deployment (BEAD) Program

BEAD Program Overview

The BEAD program will fund broadband deployment in every state and territory, leading to a significant influx of permitting and EHP activities for federal and state permitting agencies.

BEAD represents the largest amount of funding for the Internet For All Programs, distributing $42.45 billion among states, territories, D.C., and Puerto Rico by relative number of unserved and underserved locations.

BEAD will target households currently unserved or underserved by broadband access, which include many in rural and hard-to-reach areas geographically.

NTIA has started providing technical assistance to states and territories on permitting and EHP, but some project teams may be less familiar with state-level requirements.

DRAFT | PRE-DECISIONAL

BEAD Program Overview

Funding pool
$42.45B

A program to get all Americans online by funding partnerships between states or territories, communities, and stakeholders to build infrastructure where we need it and increase adoption of high-speed Internet.
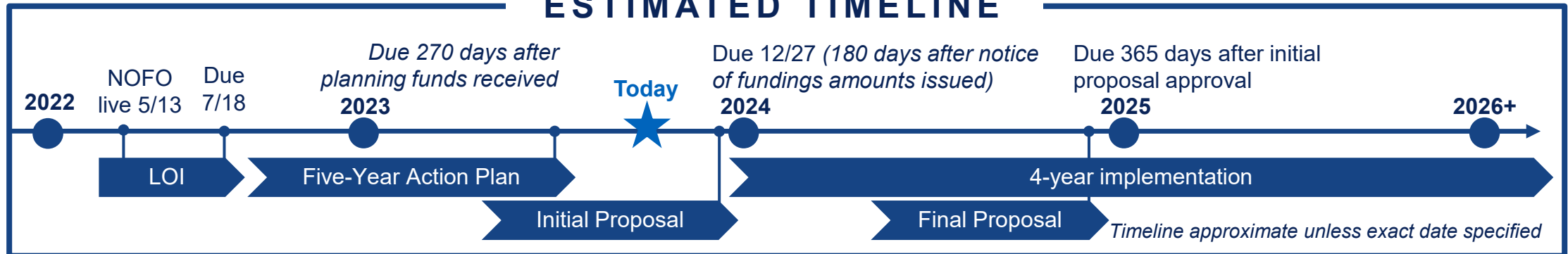
PROGRAM HIGHLIGHTS

Entities eligible to apply for this program include:

- All 50 States
- The District of Columbia and Puerto Rico
- Other Territories: U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands
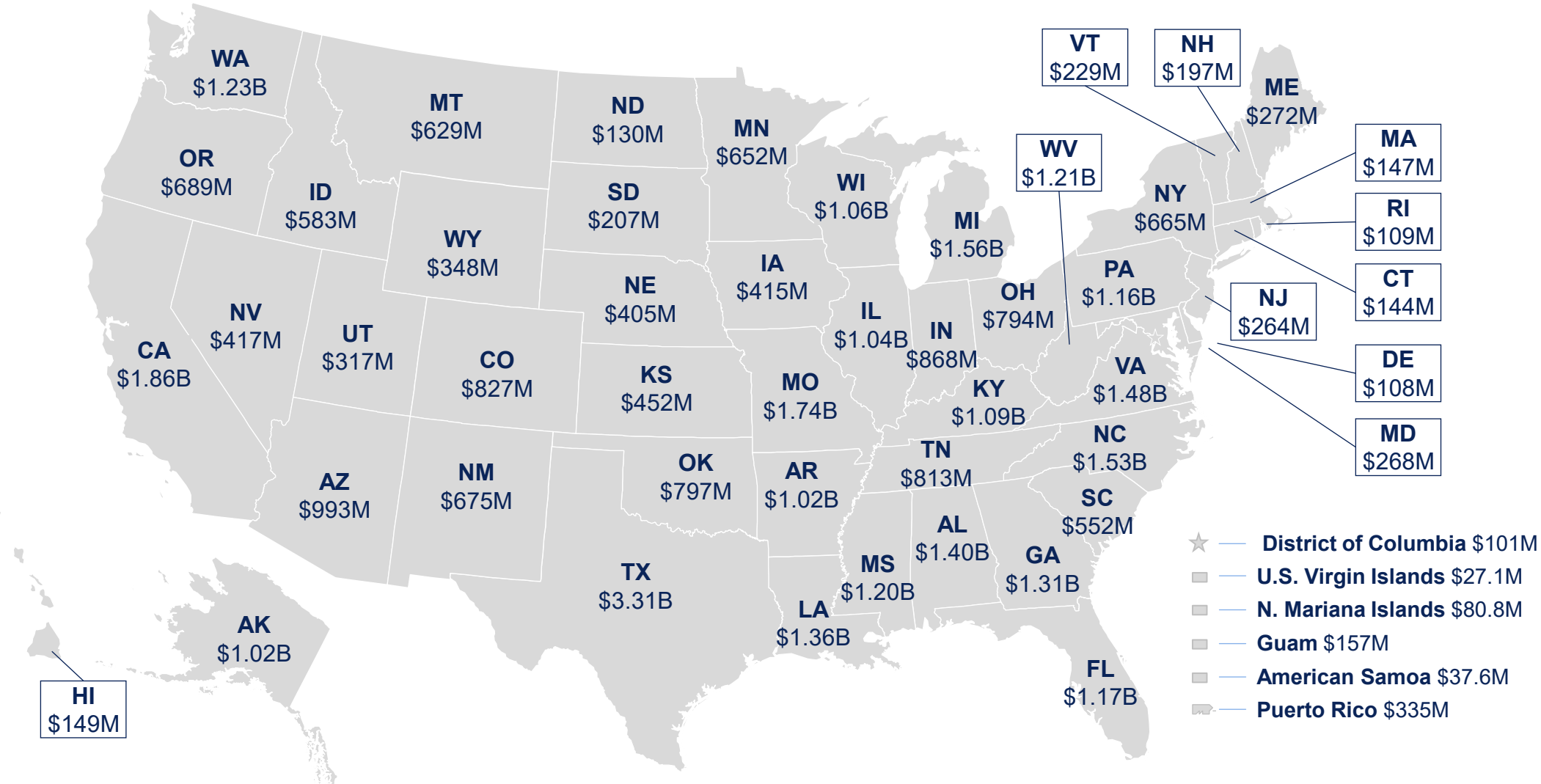
Example eligible uses of funds include:

- ☆ Planning for deployment of Internet
- ☆ Deploying or upgrading Internet
- ☆ Installing Internet in multi-tenant buildings
- ☆ Implementing adoption and digital equity programs
- ☆ Workforce and job training

ESTIMATED TIMELINE

2022

NOFO live 5/13

Due 7/18

Due 270 days after planning funds received
2023

Today

Due 12/27 (180 days after notice of fundings amounts issued)
2024

Due 365 days after initial proposal approval
2025

2026+

LOI

Five-Year Action Plan

Initial Proposal

4-year implementation

Final Proposal

Timeline approximate unless exact date specified

DRAFT | PRE-DECISIONAL

BEAD Program Overview | Funding Allocations Map

INTERNET FOR ALL

WA $1.23B

MT $629M

ND $130M

MN $652M

OR $689M

ID $583M

SD $207M

WI $1.06B

MI $1.56B

VT $229M

NH $197M

ME $272M

WV $1.21B

NY $665M

MA $147M

RI $109M

WY $348M

IA $415M

PA $1.16B

NV $417M

NE $405M

IL $1.04B

IN $868M

OH $794M

NJ $264M

CT $144M

CA $1.86B

UT $317M

CO $827M

KS $452M

MO $1.74B

KY $1.09B

VA $1.48B

DE $108M

MD $268M

AZ $993M

NM $675M

OK $797M

AR $1.02B

TN $813M

NC $1.53B

AL $1.40B

SC $552M

GA $1.31B

TX $3.31B

MS $1.20B

LA $1.36B

AK $1.02B

HI $149M

FL $1.17B

★ — **District of Columbia** $101M

◻ — **U.S. Virgin Islands** $27.1M

◻ — **N. Mariana Islands** $80.8M

◻ — **Guam** $157M

◻ — **American Samoa** $37.6M

◻ — **Puerto Rico** $335M

DRAFT | PRE-DECISIONAL

Broadband Permitting

What Types of Permits Will a Deployment Require?

INTERNET FOR ALL

IFA programs emphasize building high-speed internet infrastructure for unserved and underserved communities, which will require permits at the federal, state, and local level. Each permit may be unique in its application process, so applicants must pay close attention to the various permits they will need to juggle. It is imperative that all applicants identify and fully understand permitting requirements and procedures to ensure a streamlined process.

Easements to Access Government or Private Assets

Applicants and subgrantees will need permission – such as a right-of-way or other easement – from a range of owners/authorities when their deployment crosses: **government** *or* **privately** *owned land,* **bridges**, **overpasses**, **railroads**, **buried deployment** *(running cables underground),* **aerial deployment** *(attaching cables to utility poles and tower builds), etc. The federal government alone owns about 28% of U.S. land, and this land is managed by many different federal agencies.*
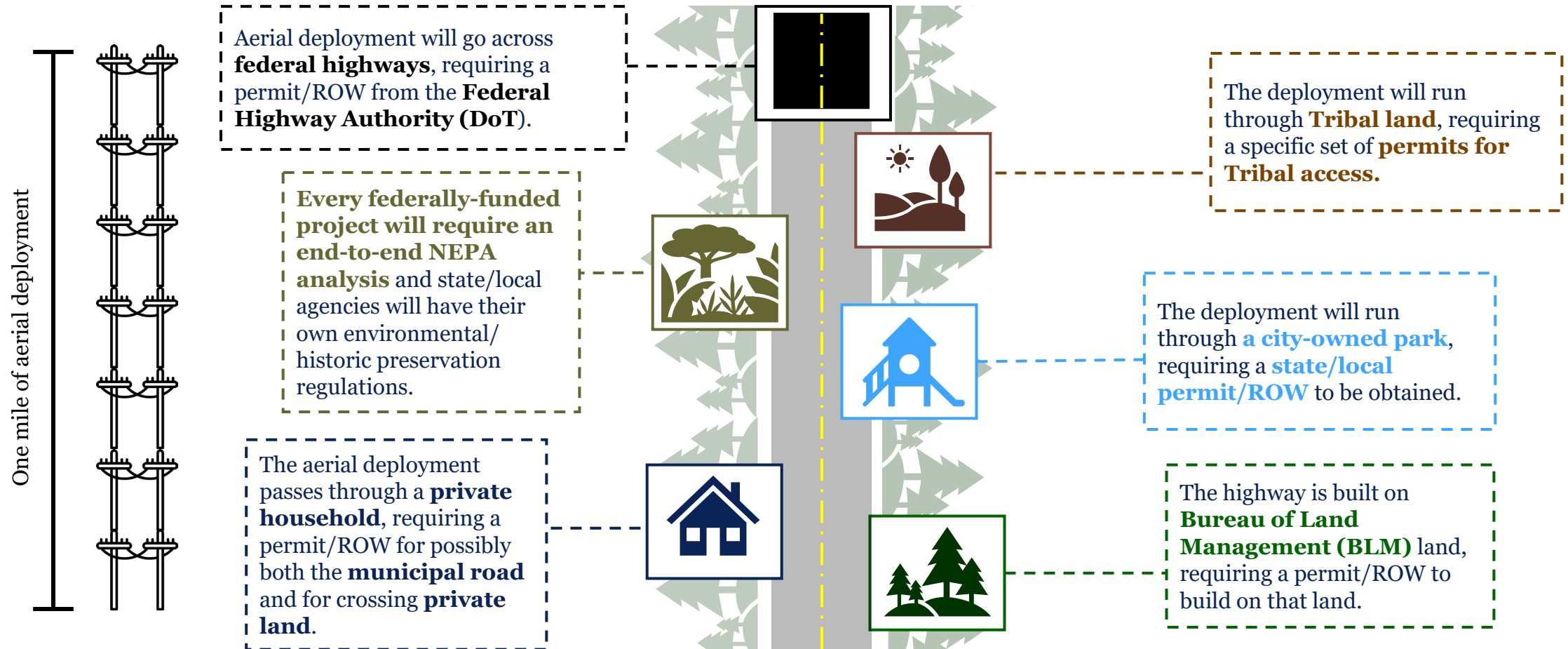
Environmental and Historic Preservation (EHP) Considerations

Federally-funded broadband projects **must** *perform a* **National Environmental Policy Act (NEPA) analysis** *and meet state, local, and/or Tribal government environmental and historic preservation permitting requirements as well. A NEPA/EHP toolkit will be provided to assist with environmental permits.*
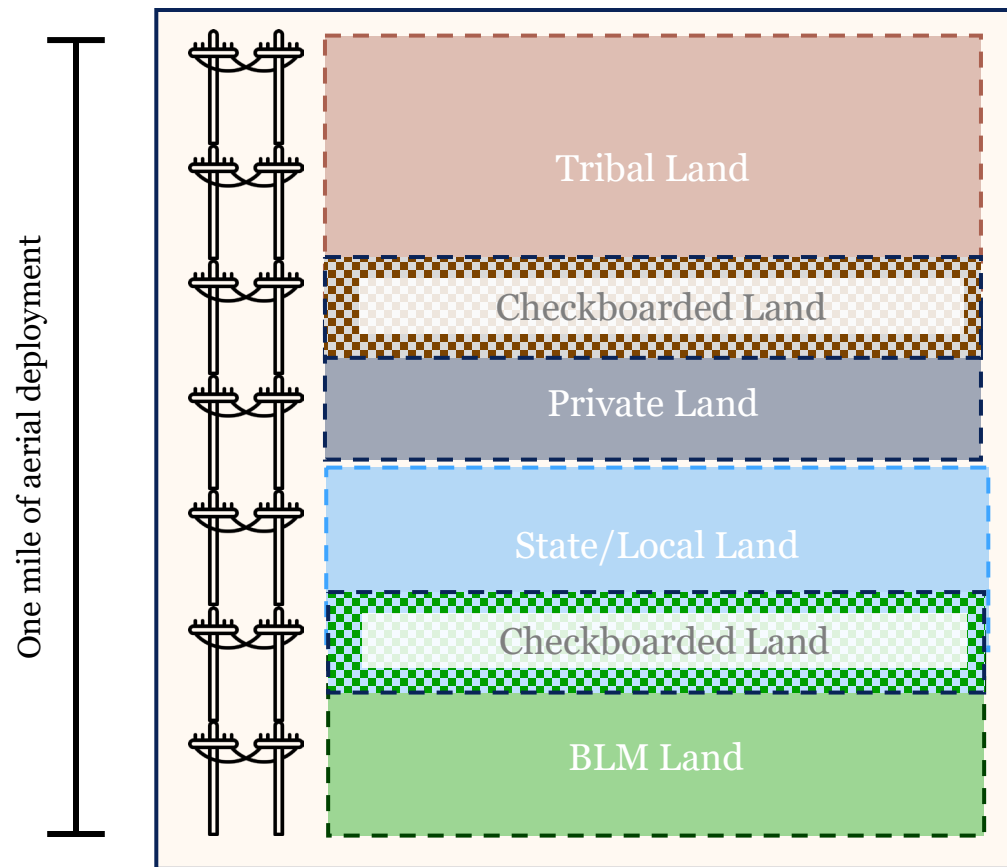
DRAFT | PRE-DECISIONAL

Potential Permits Required

A simple one-mile deployment may require many permits if it runs through many different types of land, so pay attention to where and what lands/properties the deployment will be going through.

One mile of aerial deployment

Aerial deployment will go across **federal highways**, requiring a permit/ROW from the **Federal Highway Authority (DoT)**.

Every federally-funded project will require an end-to-end NEPA analysis and state/local agencies will have their own environmental/ historic preservation regulations.

The aerial deployment passes through a **private household**, requiring a permit/ROW for possibly both the **municipal road** and for crossing **private land**.

The deployment will run through **Tribal land**, requiring a specific set of **permits for Tribal access.**

The deployment will run through **a city-owned park**, requiring a **state/local permit/ROW** to be obtained.

The highway is built on **Bureau of Land Management (BLM) land**, requiring a permit/ROW to build on that land.

DRAFT | PRE-DECISIONAL

Land Ownership and Checkerboarding

Land in the U.S. is often owned by multiple owners, requiring applicants to seek permits through multiple owners to fully access the land.

One mile of aerial deployment

Tribal Land
Checkboarded Land
Private Land
State/Local Land
Checkboarded Land
BLM Land

What does it mean when land is checkerboarded?

- Checkerboarding refers to when **land ownership is intermingled between two or more owners**, resulting in a checkerboard pattern across a given area.

- This is typically common among **railroads, private properties, forest land**, and **Tribal lands**.

- To best prepare for checkerboarding, always be confident of the landowners and **coordinate early with each agency**. **Early coordination** and **pre-meetings** will be the best way to tackle this issue early and quickly.

DRAFT | PRE-DECISIONAL

What are the Different Types of Assets and Owners?

The owners of the infrastructure or property to be used in deployment can vary widely, ranging from government entities to private corporations.

TYPES OF ASSETS

- State/Locally-Owned Land
- Privately-Owned Land
- Federally-Owned Land
- Tribal-Owned Land
- Railways
- Bridges/Overpasses
- Poles and Towers (Aerial Deployment)
- Ducts and Conduits (Buried Deployment)
- Federal Road/Highways

TYPES OF OWNERS

- Internet Service Provider
- Federal Government
- State, Local, or Tribal Government
- Telecommunications Company
- Private/Personal Ownership
- Utility Company

DRAFT | PRE-DECISIONAL

Best Practices for Streamlining Permitting

As part of the BEAD NOFO Requirement 14[1], Eligible Entities must describe to NTIA how they plan to streamline permitting to reduce costs and barriers to broadband network deployment within their state/territory.

BEST PRACTICES

Assess Capacity and Increase Communication
State and local governments must be prepared for the upcoming permitting application increase. Assessing **current capacity,** making adjustments (such as hiring consultants), and ensuring open communication with all relevant stakeholders across all units of government will support well-resourced, effective and timely permit processing.

Consolidate Permits
States and local agencies that consolidate permits (for example, by addressing duplicative permits by creating a 'General' permit) **increase the efficiency and speed** of permitting review processes.

Allow E-Permitting
Some states, such as Illinois, have already **implemented online/e-permitting to streamline the process** by allowing applicants to fill out applications online, track them, and correct them if necessary. E-permitting can **reduce applicant confusion** by helping them understand all requirements up front.

Reducing Deployment Costs
Eligible entities may **leverage the use of highway right-of-way for broadband deployments** by accommodating broadband as a utility, where possible, or seeking an exception to Fair Market Value where broadband is considered an "alternative use" of highway ROW.

DRAFT | PRE-DECISIONAL

Next Steps

INFRASTRUCTURE BUILDERS

✓ **Identify all appropriate landowners/agencies** that must grant access for the deployment.

✓ **Prepare early for a NEPA/EHP analysis** if receiving federal funding.

✓ **Engage early and schedule pre meetings** with all relevant agencies to ensure application completeness.

✓ **Submit all required documents** and track the timelines.

✓ **Learn about all relevant permitting/OTMR/Dig Once policies** planned or implemented in your area.

STATE AND LOCAL GOVERNMENTS

✓ Fully **understand all required permits and processes in your area**, not just focusing on broadband-related permits.

✓ **Encourage a streamlined permitting process** with ideas such as simplifying the number of permits, defining parameters, requiring excess capacity, and encouraging dig once policies.

✓ If your pole attachments are not regulated by the FCC, **consider requiring OTMR policies**.

✓ **Assess your current capacity** to handle the influx of permits.

DRAFT | PRE-DECISIONAL

Permitting Technical Assistance

NTIA provides TA materials on Permitting at *https://broadbandusa.ntia.doc.gov/assistance/permitting*

What is Permitting?
BEAD Permitting Resources
An introduction to permitting as it relates to broadband projects including the types of permits a deployment may require, the process for securing an easement or right of way access, and steps to obtaining permission to access federal/state/local land.

Permitting Best Practices: Case Studies
BEAD Permitting Resources
An overview of best practices related to permitting, examples that other state and local entities have implemented to streamline permitting, and red flags to avoid when doing permitting.

Permitting Needs Assessment
BEAD Permitting Resources
A checklist for four major permitting categories including ROW, Pole Attachments, Conduit Access, and Environment Planning/Historic Preservation that Eligible Entiities can use to ensure they are ready to begin the permitting process..

Environmental & Historic Preservation Checklist for BEAD
BEAD Permitting Resources
A checklist to support Eligible Entities' Five-Year Action Plans regarding the Environmental & Historic Preservation (EHP) requirements associated with the BEAD program.

Environmental & Historic Preservation Factsheet
BEAD Permitting Resources
A fact sheet to support Eligible Entities' in navigating the NEPA analysis process as required for every project funded through the BEAD program, including a description of the levels and timeline of NEPA review and EHP requirements.

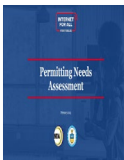### NEPA Review: Categorical Exclusions
BEAD Permitting Resources
Guidance on NEPA analysis as it relates to categorical exclusions (CATEXs) including the definition, the CATEX review process, CATEX qualifications, and a link to the DOC CATEX list.
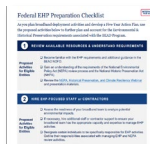
NEPA Review: Environmental Assessments
BEAD Permitting Resources
Guidance on NEPA analysis as it relates to environmental assessments including the definition, preparation steps, best practices, and the review process.

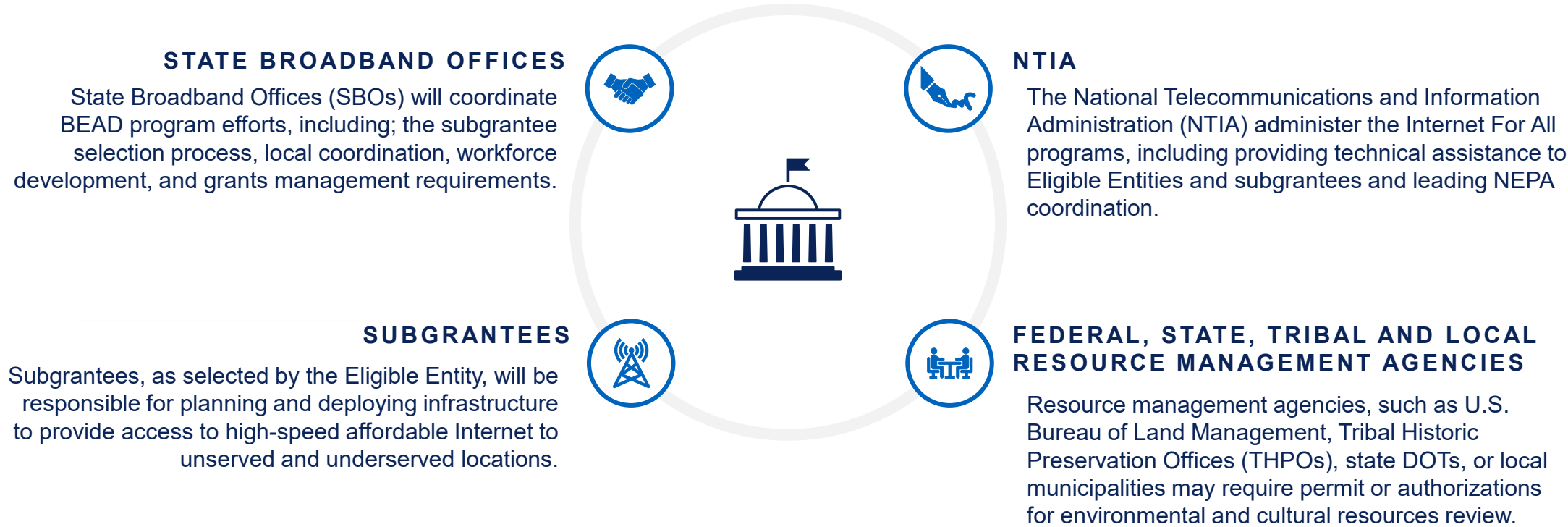### WEBINAR: Permitting 101
BroadbandUSA Events
This webinar will provide a wide overview on permitting as it relates to broadband infrastructure programs. Topics covered will include: State, Local, and Private Permitting, Pole Attachments, One-Touch Make-Ready (OTMR), Conduit Access/Dig Once Policies, NEPA/EHP, and BEAD NOFO Requirements.

DRAFT | PRE-DECISIONAL

BEAD Program Partnerships for Permitting

Federal and state governments will play a key role in supporting successful permitting for BEAD projects, working closely with partner agencies and BEAD subgrantees.

STATE BROADBAND OFFICES

State Broadband Offices (SBOs) will coordinate BEAD program efforts, including; the subgrantee selection process, local coordination, workforce development, and grants management requirements.

NTIA

The National Telecommunications and Information Administration (NTIA) administer the Internet For All programs, including providing technical assistance to Eligible Entities and subgrantees and leading NEPA coordination.

SUBGRANTEES

Subgrantees, as selected by the Eligible Entity, will be responsible for planning and deploying infrastructure to provide access to high-speed affordable Internet to unserved and underserved locations.

FEDERAL, STATE, TRIBAL AND LOCAL RESOURCE MANAGEMENT AGENCIES

Resource management agencies, such as U.S. Bureau of Land Management, Tribal Historic Preservation Offices (THPOs), state DOTs, or local municipalities may require permit or authorizations for environmental and cultural resources review.

DRAFT | PRE-DECISIONAL

Environmental Review and Project Planning

What is NEPA?

Passed in 1970, the National Environmental Policy Act (NEPA) is considered an "umbrella law" as it provides a framework within which all other environmental, historic, and cultural resources laws can be evaluated. It set forth the requirement for environmental reviews and formally established environmental protection as a Federal policy. NEPA, as well as the National Historic Preservation Act of 1966 (NHPA), requires federal agencies to "stop, look, and listen" before making decisions that impact historic properties and the human environment.

NEPA does not contain a mandate for conservation as other laws do; it is a process law.

➢ Requirements with NHPA and dozens of other environmental and historic preservation laws and Executive Orders can be addressed as part of the NEPA process.

➢ NEPA and NHPA review, including consultation, must be completed before awarded project can begin.

➢ The NEPA process requires that the government make a transparent, informed decision, but it does not require that decisions have no impacts to the environment.

➢ Documentation and analysis demonstrates that the government has not made an "arbitrary and capricious" decision.

DRAFT | PRE-DECISIONAL

What is the National Historic Preservation Act?

The NHPA does the following:
- Sets the federal policy for preserving our nation's heritage
- Establishes a federal-state and federal-Tribal partnership
- Establishes the National Register of Historic Places and National Historic Landmarks Programs
- Mandates the selection of qualified State Historic Preservation Officers
- Establishes the Advisory Council on Historic Preservation
- Charges Federal Agencies with responsible stewardship
- Establishes the role of Certified Local Governments within the States

DRAFT | PRE-DECISIONAL

Section 106 of the NHPA

- Section 106 specifically requires federal agencies to consider the effects of projects they carry out, approve, or fund ("undertakings") on historic properties

- Regulations issued by the Advisory Council on Historic Preservation (ACHP) govern the Section 106 review process

- Federal agencies initiate Section 106 review with the State Historic Preservation Office (SHPO) or Tribal Historic Preservation Office (THPO) for projects on Tribal lands

- Consulting parties, including potentially affected Tribes, participate in Section 106 consultations

DRAFT | PRE-DECISIONAL

Environmental and Historic Preservation Coordination

Environmental and historic preservation issues are addressed throughout the grant lifecycle

Pre-Award	Specific Award Conditions (SAC)	Post-Award
Project applications are reviewed to determine the expected level of NEPA analysis that will be required, and whether it constitutes an undertaking under NHPA. For the BEAD program, this will take place at the subgrant level. Some proposed projects may be able to receive clearance during pre-award review, but most will complete NEPA/NHPA requirements post-award. NTIA encourages grantees to reach out to federal land- and resource-managing agencies in **early project planning** to understand potential limitations for crossing or locating on federal lands.	For those projects that cannot receive a pre-award clearance, a Specific Award Condition will be applied to the award that allows the disbursement of funds to complete planning and analysis, including NEPA/NHPA analysis, upon award. The remainder of funds are withheld until compliance requirements are met.	NTIA will work with grantees to provide support in meeting their compliance requirements. Support activities will range from detailing additional information needed to determine the level of analysis required, to providing guidance and templates that will facilitate Section 106 consultation and EA/EIS development, as needed. *It is strongly recommended that grantees and subgrantees engage a qualified consulting firm if an EA/EIS is required.*

DRAFT | PRE-DECISIONAL

Best Practices

Eligible Entities and subgrantees can do the following in the project planning process to avoid or minimize impacts to sensitive resources:

1. Consult the *2013 U.S. Fish and Wildlife Service (USFWS) Revised Voluntary Guidelines for Communication Tower Design, Siting, Construction, Operation, Retrofitting, and Decommissioning* for any portion of your project that may require towers.

2. Reach out to federal land- or resource-managing agencies early, if applicable, to determine if your proposed project that crosses those lands is feasible. These agencies can include the US Forest Service, the Bureau of Land Management, the US Fish and Wildlife Service, the Bureau of Indian Affairs, the National Park Service, and others.

3. Consult the National Wetlands Inventory's Wetlands Mapper and the US Army Corp of Engineers (USACE) Nationwide Permit Information to understand the potential presence of wetlands in your project area, and whether USACE permits may apply.

4. Consult with your State Historic Preservation Office to inform project design.

5. Engage the services of a *qualified consultant* to produce any required environmental analysis, such as Environmental Assessments, surveys, and any required studies.

The most common factors that extend the EHP process are impacts to sensitive resources – understanding how to avoid or minimize those impacts is crucial for moving through the process efficiently

Program and Project Efficiencies and Tools

The broadband projects can gain efficiencies through the use of programmatic agreements, shared tools, and other best practices.

PROJECT LEVEL TOOLS

Examples may include:

- Tribal monitors during construction and archeology surveys
- Utilizing GPR and LIDAR for subsurface analyses
- Face-to-face G2G formal consultation
- Establishment of milestones and concurrence points
- Synchronized environmental review and permitting
- Administrative DEA/DEIS reviews
- Routing in disturbed, existing right of ways
- Pre-application meetings
- Early surveys and right-sizing NEPA reviews
- USFWS IPAC system, Wetlands Mapper, and other online data resources

PROGRAM LEVEL EFFICIENCIES

Examples may include:

- MOUs with relevant Federal partners
- PAs with State Historic Preservation Offices
- Programmatic ESA reviews. Example: CA Middle Mile Programmatic BA
- Funded Liaison positions
- NWP 57
- FAST Act Coverage where eligible and appropriate
- BIA Broadband National Policy Memorandum
- Construction work windows for ESA species
- Providing technical assistance on minimally invasive deployment methodologies

DRAFT | PRE-DECISIONAL

Environmental Review and Permitting Synchronization

NTIA will invite other federal agencies to be Cooperating Agencies under NEPA with the intent to reduce or eliminate any duplicative reviews that could result from these multiple independent responsibilities.

- Multiple agencies can have NEPA obligations for a single project, because the issuance of a federal authorization triggers NEPA for the permitting/authorizing agency, just as the expenditure of federal funds in the form of grant dollars triggers NEPA for NTIA.

- Certain federal agencies have statutory authority over certain resources that are protected by federal laws, such as the Endangered Species Act; those agencies must be involved in any project with the potential to affect those resources.

- Careful project planning, synchronized environmental review and permitting, and an awareness of processes, sequencing, and timelines required for each agency are essential to effective and realistic project planning.

Early coordination is critical to successful project planning and execution.

Additional Resources

NTIA provides resources on the Internet For All program, BEAD, and permitting guidance to support successful broadband deployment.

Internet For All Website

For detailed program information about the Internet For All Grants, use InternetForAll.gov to search by program.
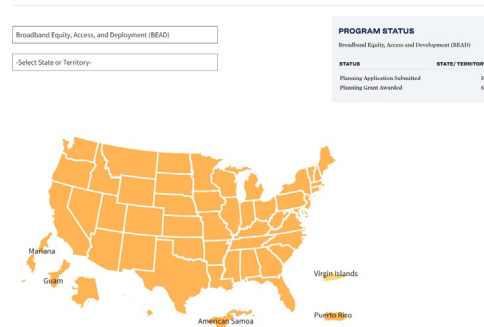
Interactive Funding Map

BEAD Program Resources

NTIA offers BEAD Program Resources including policy guidance and technical assistance.

BEAD Initial Proposal Progress Dashboard

NTIA Permitting Guidance

NTIA has compiled a Permitting Technical Assistance page on available permitting and EHP resources.
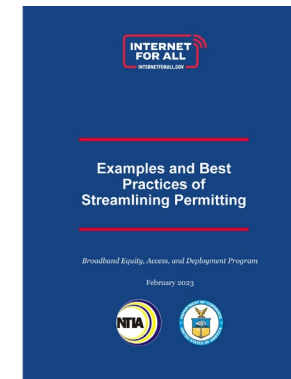
Permitting Best Practices: Case Studies

For more information, visit the BroadbandUSA State and Local Government webpage.

DRAFT | PRE-DECISIONAL