

## **PUBLIC WIRELESS SUPPLY CHAIN INNOVATION FUND**

### **Frequently Asked Questions (FAQs)**

The Public Wireless Supply Chain Innovation Fund was authorized under Section 9202(a)(1) of the *William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021*, and Pub. L. No. 116-283, 134 Stat. 3388 (Jan. 1, 2021) (FY21 NDAA) appropriated under Div. A., Section 106 of the *CHIPS and Science Act of 2022*, Pub. L. No. 117-167, 136 Stat. 1392 (Aug. 9, 2022). This federal funding aims to foster competition, lower costs for consumers and network operators, support innovation across the global telecommunications ecosystem, and strengthen the 5G supply chain.

The following document contains the first in a series of Frequently Asked Questions (FAQs) intended to clarify and provide guidance on information set forth in the Notice of Funding Opportunity (NOFO) on April 12, 2023. Following the release of this document, further questions may be submitted to [InnovationFund@ntia.gov](mailto:InnovationFund@ntia.gov) for consideration to include in future FAQ documents.

*The below FAQs are for informational purposes only and are intended solely to assist potential applicants in better understanding the National Telecommunications and Information Administration (NTIA) Public Wireless Supply Chain Innovation Fund and the application requirements set forth in the Notice of Funding Opportunity (NOFO) for this program. The FAQs do not and are not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, or the specific application requirements set forth in the NOFO. In all cases, statutory and regulatory mandates, and the requirements set forth in the NOFO, shall prevail over any inconsistencies contained in the below FAQs.*

# 1 Overview

## 2 Eligibility and Program Details

### **2.1 Is NTIA able to further clarify its requirement for place of performance, specifically regarding the virtualized or remote testing? Must all activities be conducted within the U.S. and entities can join virtually abroad?**

Virtualized and remote testing must be conducted and operated from the United States and its territories. Testing participants may access the testing from outside of the United States provided that the testing participants have been determined to be eligible entities. See Section 2 of the NOFO for more information on eligible and ineligible participation.

### **2.2 Are there specific limitations on work or participation on grant-funded projects by personnel of applicants or participants who are not U.S. citizens?**

Non-citizens may work on grants (except those non-citizens who are from countries of concern).

### **2.3 Why must T&E events and R&D take place in the U.S. and its territories?**

The Innovation Fund aims to support U.S. leadership in the global telecommunications ecosystem, foster competition, and drive wireless innovation. We also aim to unlock opportunities for new and emerging U.S. companies, particularly small and medium enterprises, to compete in a market historically dominated by few suppliers, including high-risk suppliers that raise security concerns. By ensuring T&E events and R&D events take place in the U.S. and territories, we are investing in U.S. innovation and the promise of open and interoperable networks – including the opportunities this approach presents for the U.S. and our allies. This helps create jobs for U.S. citizens and aligns with methods implemented by our like-minded government partners in Europe and Asia conducting similar programs.

### **2.4 Are there any other special requirements for international organizations that would like to apply for this opportunity?**

Besides the requirement that federally funded work be performed in the United States (including its territories and possessions), International Entities with no subsidiary in the U.S., must obtain an NCAGE Code from [here](#) before starting a Sam.gov registration. Sam.gov also provides a [Quick Start Guide for International Registrations](#) that can help such entities throughout the process.

### **2.5 Can you confirm that indirect costs are allowable charges under this NOFO? I see in the NOFO that an applicant can use its indirect costs as part of its cost match and discusses indirect costs for the budget.**

Indirect Costs are allowable costs under this NOFO. This means that indirect costs can be a direct federal cost or can be used as a cost share. You may use a maximum de minimis rate of 10% with no additional documentation required or you may use a previously negotiated federal

indirect costs rate. In such a case, please provide a copy of the approved negotiated agreement. Please see Section 3.2.g. of the NOFO and 2 C.F.R. § 200.414 for more information.

**2.6 I have a question about Form SF-328 that is one of the required forms to submit with the grant application. I cannot find a current version of instructions for the form that contains the definitions of the terms and a list of documents that may need to be submitted with the form to support the statements made on the form.**

**Form SF-328 is normally used for funding opportunities that involve classified information or a request for a facility clearance, can you confirm that neither of those are expected for Innovation Fund grantees?**

We do not anticipate any handling of classified information/documents during the grant activities, therefore, please do not include any classified information in your submission.

**2.7 How should applicants calculate the cost of fringe benefits?  
Is there any NTIA guidance on what type of travel rates are allowable costs under the NOFO?**

See 2 CFR § 200.475: Travel costs may be charged on an actual cost basis, on a per diem or mileage basis in lieu of actual costs incurred, or on a combination of the two, provided the method used is applied to an entire trip and not to selected days of the trip, and results in charges consistent with those normally allowed in like circumstances in the non-Federal entity's non-federally-funded activities and in accordance with non-Federal entity's written travel reimbursement policies. In the absence of an acceptable, written non-Federal entity policy regarding travel costs, the rates and amounts established under 5 U.S.C. 5701–11, (“Travel and Subsistence Expenses; Mileage Allowances”), or by the Administrator of General Services, or by the President (or his or her designee) pursuant to any provisions of such subchapter must apply to travel under Federal awards (48 CFR 31.205–46(a)). GSA Per Diem rates can be found [here](#).

**2.8 Will investments already made to test and advance O-RAN systems be considered as demonstration of cost sharing or matching?**

Possibly. The investment must be directly allocable, and the cost share attributed to the proposed project must be proportional to the investment’s cost basis. Investments that were initially acquired with federal funding may not be used as a cost share for another federal grant program.

**2.9 Are there any US geographic restrictions or preferences?**

Certain grant funded activities must be conducted in the United States and its territories. While the program is not giving preference to any location within the United States, the program does recognize that having T&E capabilities in various locations across the country can be advantageous, rather than concentrated in one geographic area. Therefore, the NOFO does state that the location of T&E activities may be used as a selection factor in awards.

## **2.10 Will the US place of performance requirement continue for future funding opportunities within the Supply Chain Innovation Fund?**

Not necessarily. We made a strategic policy decision to require the place of performance for our first NOFO to be in the US/US territories. The Wireless Innovation Fund team is refining our future NOFO plans and encourages stakeholders to refer to our website for the most up to date information.

## **2.11 Section 4.6.1. of the NOFO requires recipients to hold property in trust for the beneficiaries of the project. What does this mean in practical terms? Will grant recipients be required to give money back? Are there any tax implications of the trust relationship?**

Equipment acquired with federal funds must be used for the purpose intended in the grant program throughout its useful life, even after the grant period of performance has expired. For example, if a piece of equipment with a useful life of 10 years is purchased to facilitate testing and evaluation activities in accordance with the NOFO, then that equipment must continue to be used for that purpose for the full 10 years, even if the grant expired after 5 years. If the entity shuts down their testing and evaluation program at the end of 5 years, however, the entity will have to repurpose the equipment for other federally sponsored activities or request disposition instructions from NTIA. (See 2 CFR § 200.313(c)(1) and (e).) Grantees may mitigate this by only allocating a proportion of the costs to the grant. In addition, if a piece of equipment is purchased with the intention of using it for grant-related purposes and other non-grant related purposes, only the portion of the equipment used for grant purposes can be charged to the grant or used as a cost share.

## **2.12 Are government entities eligible for funding?**

Government entities are not eligible for Innovation Fund awards in this first NOFO. Eligibility is currently only for “for-profit companies, non-profit companies, institutions of higher education, industry groups, and consortia consisting of two or more such entities.” Section 2.1 of the NOFO.

## **2.13 Can a company be part of multiple consortiums?**

The Innovation Fund NOFO is focused on companies, academic institutions, associations, consortia, and other entities utilizing their expert knowledge of open and interoperable 5G technology to improve access and availability of testing and evaluation throughout the United States, as well as research and development into new and improved 5G test methods. While the primary grantee is capped at \$50,000,000 per focus area, a company can be part of multiple consortiums. All parties involved, however, (*e.g.*, subgrantees) must be registered in SAM.

## **2.14 Can \$2.5 million to \$5 million be allowed for T&E activities?**

There are no minimum award thresholds, however the expected range of individual awards for T&E activities is \$10,000,000 to \$50,000,000, while testing methods R&D are expected to range between \$250,000 and \$2,000,000. Please consult NOFO sections 1.5 Award Amount and 1.6 Limitations on Grant Awards for details.

### **3 Funding & Period of Performance**

#### **3.1 Do you know how many awards NTIA anticipates funding in each track (T&E activities and Testing and Modeling R&D)?**

The program has not set a minimum or maximum number of awards. We are looking to fund worthy projects that demonstrate the ability to add value to the ecosystem.

#### **3.2 We have a large 5G testing facility with towers, cabinets, power supplies, fiber etc. Can this be listed as an in-kind contribution? If so, can we list both materials and installation costs. This is already in place so we would not be adding future construction costs.**

Construction costs are not authorized for this NOFO, so costs for prior construction will not be considered as a matching contribution. However, acquisition and installation of equipment to support testing is authorized and can be used as a matching contribution. In this case, towers, fixed outdoor cabinets, and in-ground fiber plant would be considered “construction” costs, but power supplies, power distribution units, etc. that do not serve as permanent infrastructure would be considered equipment and could be used as matching contribution. Likewise, if the equipment was paid for by another federal grant or other federal funding source, it cannot be considered for a matching contribution. Additionally, the prior costs included in the match must be directly related to the scope of work in your proposal.

#### **3.3 Are we allowed to use DOD 5G testbed facilities as collaborators? I understand that we could not fund federal employees but what about their contractors? Would equipment and circuit costs to federate the two testbeds be allowable?**

DoD 5G Testbed facilities may be used as collaborators, but federal employees cannot be funded by this grant program and any contractors cannot simultaneously be funded by this grant program and another federal source to accomplish the same work (a.k.a. “double-dipping”). If a DoD Testbed facility will be collaborating with your proposal, a cognizant authority within DoD will need to approve the collaboration. The collaboration with the DoD Testbed facility cannot be used for matching contribution if the equipment or staffing was paid for by another federal agency.

The costs to federate the two testbeds would be allowable as long as 1) the Innovation Fund is not duplicating expenses with another federal funding source, 2) the federation is necessary to complete the scope of work in your proposal, and 3) the cognizant authority on the DoD side approves the interconnection activity.

#### **3.4 Are there any IP ownership considerations or restrictions related to the use of funds that grant applicants should keep in mind when developing a proposal?**

Grant applicants are advised to consider 2 CFR § 200.448 Intellectual Property and 2 CFR § 200.315 Intangible Property of the Uniform Guidance when developing their proposals.

### **3.5 What would the invoicing structure be for the performers of this grant?**

Grant funding will be available through an automated drawdown system as costs are incurred. Supporting documentation (invoices, timesheets, etc.) for the drawdown amounts must be maintained by the grantee and is subject to audit and monitoring by the government.

### **3.6 For testing methods R&D projects, what are the expectations for sharing test results and testing methods publicly?**

For test method R&D projects, broad dissemination of research results through media such as peer-reviewed publications are highly encouraged, although not required.

### **3.7 Is there a minimum expected period of sustainability for a project beyond the period of performance?**

There is no set expected period of sustainability, however merit reviewer's evaluation of a sustainability plan may factor into application score. See Section 3.3.1. (n) of the NOFO for the technical proposal sustainability factor and Section 4.1.2. (a).3 for the evaluation of sustainability in the scoring criteria.

### **3.8 Please clarify the distinction between Contracts and Sub-Awards. Is it correct that funding provided through contracts is not subject to the requirement for full cost accounting but must be supported by official quotes?**

A sub-award subjects the sub-awardee to the same terms and conditions as the direct grantee and it requires the direct grantee to oversee the sub-grantees' activities to ensure they are reasonable and allowable. A sub-award is typically used when the subaward entity will be substantially conducting or contributing to direct grant funded activities. A contract is used to purchase services and goods but does not subject the vendor to the applicable terms and conditions of the award. Awardees should document the basis of contract awards through official quotes or other similar means of demonstrating free and open competition and best value.

## **4 Review and Scoring Process**

### **4.1 If NTIA "will give preference to applications that demonstrate cost sharing or matching in their project plan and project budget" please explain how that preference will be objectively applied to the evaluation and rating of submitted proposals. Will that be part of another evaluation process that has not been articulated in the Notice of Funding Opportunity?**

Cost share will be considered as a component of the relative cost effectiveness of a proposal compared with other like-focused projects.

## **5 Application Components and Process**

### **5.1 I am trying to attach my technical proposal and narrative, but I do not know how to do it. Can you please provide guidance?**

Attachments such as the technical proposal, the budget narrative, as well as any other items listed in Section 3.2 points **b.1**, and **e** through **i** of the NOFO must be uploaded to Grants.gov as attachments to field 15 of the SF-424 form by clicking on “Add Attachment” button.

### **5.2 When will the team begin taking meetings? How can I get my questions answered?**

Since this is a competitive grant program, we are encouraging stakeholders to gain additional information about the program through the following channels:

- Check the Innovation Fund website regularly for more information. We will post program updates and frequently asked questions there.
- If you have specific questions about the Innovation Fund program or the program requirements, you can submit questions to [innovationfund@ntia.gov](mailto:innovationfund@ntia.gov). We will provide written responses and will also publicly post the questions and answers under the Frequently Asked Questions on our website.
- Please review the recording of our first Info Session, recording can be found [here](#).

### **5.3 Are subgrantees able to participate in more than one proposal?**

Subgrantees may participate in more than one project.

### **5.4 If a company is registered to lobby under the Lobbying Disclosure Act, is the SF-LLL lobbying disclosure form required?**

Yes

### **5.5 Is there further guidance on what is included in the 20-page limit for the Technical Proposal? Are letters of support/memorandums of understanding the only materials not included in the 20-page limit?**

Letters of support/memorandums of understanding, resumes and CV, lists of citations, consortium agreement documents and other information that supports the technical proposal may be submitted in addition to the 20-page technical proposal. The supporting material will not be scored but may be used by merit reviewers to verify, validate, or support the content of a technical proposal.

**5.6 Under NOFO Section 3.2, applicants may propose more than one specific research focus area and must do so as separate applications. For proposals that are non-research T&E activities, may applicants submit more than one application? Consider the following: Assume the substance of the applications are substantially different. Submit multiple applications to support regional diversity (section 4.14(c)).**

An entity is not prohibited from submitting more than one T&E project. There are factors to consider:

- Entity would be limited to \$50M cap, no matter how many separate projects are submitted.
- There is no limit on scope of a proposed T&E project – can include multiple locations and multiple partnering organizations. The NOFO allows for technical proposals with a comprehensive approach.
- Other submitted applications with wider scope may have a competitive advantage over several smaller projects.
- Entity would be responsible for submitting separate progress reports and would need to keep separate expenditure documentation and grant files.

**5.7 For entities that applied for SAM registration, but the registration is not complete, will NTIA still accept applications from such entities?**

There is no plan to waive SAM registration requirement. Entities are strongly advised to complete their registration as soon as possible.

**5.8 There is an optional objective listed in the NOFO for T&E lab to be located at a neutral host facility defined as “a host facility not affiliated with, owned by, or under direct influence of a 5G radio access network equipment or solution provider”. Can a 5G radio access network equipment or solution provider join a consortium that is responding to the NOFO and still meet this optional objective if the T&E lab is located at a neutral host facility?**

As long as the radio access network equipment or solution provider does not have sole controlling stake in the operation or strategic direction of the neutral host facility, this would be allowable.

**5.9 Are the two focus areas identified, (1) T&E Activities, and (2) Testing Methods R&D, considered as separate and distinct from each other? Is a separate proposal required for each? If so, what is the max page count for R&D? Alternatively, is it permissible to address both focus areas and how the two may be interrelated in a single comprehensive proposal?**

T&E and R&D projects are separate and distinct with different evaluation criteria and technical proposal components. Applicants may apply to both focus areas and if so, must submit separate applications. 20 pages is the maximum technical proposal for each R&D project.



## **5.10 If licensed spectrum is a requirement for T&E activities and to meet the objectives of NTIA PWSCIF, within which budget category would it belong?**

Licensed spectrum would fall into “Other” category.

## **6 Technical FAQs**

### **6.1 Why focus on T&E when industry is already engaging in this space?**

T&E is foundational to the ultimate success of open and interoperable wireless networks and will help build confidence in the viability of Open RAN solutions and remove barriers to adoption. In fact, 76% of RFC respondents cited the need to prioritize testing through the PWSCIF. There is also an equity issue with some of the existing T&E programs: some require you to be a member of a specific industry organization, some are invite-only, and most do not share any information publicly. Having T&E activities that are equitably accessible and provide anonymized, aggregated data can help industry move forward in a meaningful way.

### **6.2 What is the timeline for any future Funding Opportunities through the Public Wireless Supply Chain Innovation Fund? What will be the interest areas for such future Funding Opportunities?**

The team is in the process of developing strategies for designated interest areas to include in future NOFOs. Currently, there is no timeline or estimate for the next NOFO release. We recommend you monitor [NTIA.gov](https://www.ntia.gov) and the innovation fund website for future announcements.

### **6.3 Are innovations related to the prototyping of O-RAN use cases (*e.g.*, use cases from the O-RAN Alliance Use Cases Analysis Report) of interest for this current Expanding Testing and Evaluation NOFO? Might they be aligned with Task 2 - “develop new and/or materially improve existing testing methodologies to test, evaluate, and validate the performance, interoperability, and/or security of these networks”? If not of interest for this Expanding Testing and Evaluation NOFO, will the prototyping of O-RAN use cases be of interest for future Public Wireless Supply Chain Innovation Fund funding opportunities?**

If the submission aligns to meet the technical focus area 2 of the NOFO we would welcome your submissions. Future NOFOs will be announced at a later date. We currently do not have a timeline or technical details on what future NOFOs will include.

### **6.4 Are there specific types of projects that NTIA is looking to see in response to the NOFO? (*e.g.*, lab upgrades, certification processes, etc.)?**

We are seeking projects that expand the availability of neutral testing and evaluation capabilities of interoperable open 5G equipment and software and research into testing methods to fill existing gaps or to improve existing testing methods.