NOTICE OF FUNDING OPPORTUNITY
Public Wireless Supply Chain Innovation Fund Grant Program
NOFO 4 – Solutions for AI-Native RAN

EXECUTIVE SUMMARY

A. Federal Agency Name

National Telecommunications and Information Administration (NTIA), U.S. Department of Commerce

B. Funding Opportunity Title

Public Wireless Supply Chain Innovation Fund Grant Program – Solutions for AI-Native RAN

C. Announcement Type

Initial

D. Funding Opportunity Number

NTIA-PWSCIF-26-01

E. Assistance Listing (CFDA Number)

11.038 – Public Wireless Supply Chain Innovation Fund

F. Key Dates

Complete applications must be submitted through Grants.gov no later than 11:59 p.m. Eastern Time on September 9, 2026.

NTIA expects to make awards on a rolling basis.

G. Application Submission Address

Complete application packages must be submitted electronically through the Grants.gov website. Application packages or portions thereof submitted through postal mail, courier, email, facsimile, or other means will not be accepted. See ***Section 6*** of this Notice of Funding Opportunity (NOFO) for detailed information concerning application submission requirements.

H. Funding Opportunity Description

This NOFO is the fourth issued under NTIA's Public Wireless Supply Chain Innovation Fund

(PWSCIF or Innovation Fund). Titled "**Solutions for AI-Native RAN,"** the goal of this NOFO is to support the development of a secure compute environment to enable or leverage native artificial intelligence ("AI") capabilities in the Radio Access Network (RAN) that generate revenue for operators, cost savings, and innovative third-party services, and demonstrate a business case for one or more services that leverage these capabilities, accelerating commercial deployments and the export of open, interoperable, and secure equipment.

Applicants may submit a maximum of one application under this NOFO containing only one (1) proposed project. The applicant is the lead entity, i.e., the organization submitting the application package on Grants.gov using a unique SAM registration. There is no restriction on the number of applications in which an entity may participate as a subrecipient, contractor, consultant, or any other type of participant.

I. Funding Instrument

Grant

J. Eligibility

Eligibility requirements can be found in ***Section 2.2***.

K. Anticipated Amounts

NTIA may award up to $53,000,000 of total funding under this NOFO. NTIA may award up to $25,000,000 per project.

L. Cost Share

There is a 50% minimum cost share requirement. See ***Section 2.2.4*** for more information on cost share.

NOFO STRUCTURE

This NOFO is organized as follows:

- **Section 1 (Overview)** provides an overview of the Innovation Fund and this funding opportunity, including how this funding opportunity meets the statutory objectives of the Innovation Fund.

- **Section 2 (Eligibility)** describes the eligibility requirements for this NOFO, including eligible vs. ineligible entities, cost share, funding amount, period of performance, and place of performance.

- **Section 3 (Technical Maturity Requirements)** describes the technical maturity requirements that all projects must meet before exiting the period of performance.

- **Section 4 (Project Narrative)** details the content that applicants must include in their Project Narratives, including technical and other deliverables.

- **Section 5 (Required Application Materials)** lists all the materials that applicants must include in their application package.

- **Section 6 (Application Submission)** explains the application submission process that all applicants must follow. This includes application format, instructions for electronic filing, revision process, and other submission requirements.

- **Section 7 (Application Review)** explains each step of application review: Initial, Merit, Programmatic, and Selecting Official Approval. It also includes projected dates for awards and information on the applicant notification process.

- **Section 8 (General Requirements, Restrictions, and Other Information)** provides information related to allowable costs, intellectual property, awarding agency contact information, and other information. ***NOTE:*** *The requirements and prohibitions in this section apply to ALL submitted applications*.

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Section 1 – Overview

The National Telecommunications and Information Administration (NTIA) issues this Notice of Funding Opportunity (NOFO) to describe the requirements under which it will continue awarding grants in connection with the Public Wireless Supply Chain Innovation Fund (PWSCIF or Innovation Fund).

1.1 Program Authority

The Innovation Fund is authorized by Section 9202(a)(1) of the *William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021*, Pub. L. No. 116-283, 134 Stat. 3388 (Jan. 1, 2021) (*FY21 NDAA*), codified at 47 U.S.C. § 906(a)(1).

The Innovation Fund was initially appropriated by Div. A, Section 106 of the *CHIPS and Science Act of 2022*, Pub. L. No. 117-167, 136 Stat. 1392 (Aug. 9, 2022), and later modified by Section 40011 of the *Working Families Tax Cut Act*, Pub. L. No. 119-21, 139 Stat. 72 (July 4, 2025).

1.2 Program Overview

NTIA will leverage the Innovation Fund to meet its statutory objectives and help implement the President's AI Action Plan for wireless AI infrastructure to promote the export of U.S. technology in the AI stack. 6G is expected to be both AI-driven and an AI enabler, and leadership in this next-generation technology will be critical to maintain and expand U.S. AI leadership. The program's objectives include unlocking opportunities for innovative U.S. companies to lead on and showcase the benefits of AI-native RAN innovation, and in turn compete in a market historically dominated by an untrusted vendor.

Pursuant to the *FY21 NDAA*, the Innovation Fund facilitates the adoption of open and interoperable wireless networks through the following statutory objectives found at 47 U.S. Code § 906 (a)(1)(C):

i. Promoting and deploying technology, including software, hardware, and microprocessing technology, that will enhance competitiveness in the 5G and successor wireless technology supply chains that use open and interoperable interface radio access networks (RAN).
ii. Accelerating commercial deployments of open interface standards-based compatible, interoperable equipment, such as equipment developed pursuant to the standards set forth by organizations such as the O-RAN Alliance, the Telecom Infra Project, 3GPP, the Open-RAN Software Community, or any successor organizations.
iii. Promoting and deploying compatibility of new 5G equipment with future open standards-based, interoperable equipment.
iv. Managing integration of multi-vendor network environments.
v. Identifying objective criteria to define equipment as compliant with open standards for multi-vendor network equipment interoperability.

vi. Promoting and deploying security features enhancing the integrity and availability of equipment in multi-vendor networks.
vii. Promoting and deploying network function virtualization to facilitate multi-vendor interoperability and a more diverse vendor market.

To date, the Innovation Fund has released two NOFOs obligating a total of $550 million across 35 grant awards. The first NOFO provided grants for testing and evaluation labs to expand access to Open RAN testing for new and emerging vendors.[1]

The second NOFO provided grants for the commercialization and innovation of open radio units (RUs), the key hardware component for Open RAN.[2]

This NOFO, in keeping with the President's AI Action Plan and the Innovation Fund's statutory objectives, will provide grants to promote the development of a secure, AI-native telecommunications architecture built on open, interoperable networks. Such architectures can accelerate U.S. telecommunications innovation. Applications developed and demonstrated through these grants will show how sharing network data in an AI-native environment can enable new revenue streams.

1.3 Funding Opportunity Overview

The goal of this NOFO is to demonstrate the value of deploying AI, including both U.S. led advanced computing capabilities and software, in RAN. Such demonstrations can promote the deployment of AI-native RAN networks both domestically and internationally, benefiting U.S. companies and U.S. security goals. Through this NOFO, NTIA will provide capable entities with financial assistance to develop an AI-native network architecture and to field test a service uniquely enabled by the architecture.

Alignment with Statutory Objectives

Promoting the development and adoption of an AI-native RAN architecture and services uniquely enabled by that architecture will help achieve the following statutory objectives of the Innovation Fund:

- **Enhance Supply Chain Competitiveness[3]:** Developing an AI-native network fabric will enhance competitiveness in the 5G and successor wireless technology supply chains by opening the RAN to innovative market players, such as authenticated third-party AI application developers and IT compute providers.

[1] *See* NTIA, Notice of Funding Opportunity, "Research and Development, Testing and Evaluation"
[2] *See* NTIA, Notice of Funding Opportunity, "Open Radio Commercialization and Innovation"
[3] *See* 47 U.S.C. § 906 statutory objective (i): (i) Promoting and deploying technology, including software, hardware, and microprocessing technology, that will enhance competitiveness in the fifth-generation (commonly known as "5G") and successor wireless technology supply chains that use open and interoperable interface radio access networks.

- **Accelerate Commercial Deployments[4]:** Developing an AI-native network fabric, and demonstrating the commercial viability of one or more services uniquely enabled by it, will accelerate commercial deployments of open interface, standards-based compatible, interoperable equipment by driving demand for this equipment. Projects are required to demonstrate a Business Case, including a path to broad adoption and deployment.

- **Manage Network Integration[5]:** The NOFO will support AI-native solutions that may enable acceleration of multi-vendor integration processes.

- **Enhance Security[6]:** Given the impact on future critical infrastructure information technology (IT) and operational technology (OT), applications must include a Security Plan demonstrating that all recipients and sub-recipients will integrate cybersecurity into the design, development, operation, and maintenance of solutions (security by design), consistent with best practices and standards. This security by design approach will provide a framework to address threats that could compromise their integrity and availability, ensuring a high standard of security in future networks, including multi-vendor networks, that feature the solution.

- **Promote Network Virtualization[7]:** Developing an AI-native network fabric, and demonstrating the commercial viability of one or more services uniquely enabled by it, has the potential to drive demand for software-based, AI-enabled networks, promoting network function virtualization that opens the RAN to innovative market players, such as authenticated third-party AI application developers and IT compute providers.

In addition to advancing the Innovation Fund's statutory objectives, awards under this NOFO will accelerate AI innovation in line with America's AI Action Plan.[8]

Public Input Received

Like NTIA's first and second funding opportunities, this NOFO is informed by industry engagement and market analysis.

NTIA's industry engagement across the wireless marketplace informed where public investment could most effectively accelerate network innovation. Participants in NTIA's third Innovation Fund listening session on March 23, 2026 stated that AI can drive network optimization, such as by improving radio access, efficient spectrum use, and energy efficiency, and argued that U.S. AI leadership is critical for advancing resilient, autonomous

[4] *See* 47 U.S.C. § 906 statutory objective (ii): (ii) Accelerating commercial deployments of open interface standards-based compatible, interoperable equipment, such as equipment developed pursuant to the standards set forth by organizations such as the O-RAN Alliance, the Telecom Infra Project, 3GPP, the Open-RAN Software Community, or any successor organizations.
[5] *See* 47 U.S.C. § 906 statutory objective (iv): (iv) Managing integration of multi-vendor network environments.
[6] *See* 47 U.S.C. § 906 statutory objective (vi): (vi) Promoting and deploying security features enhancing the integrity and availability of equipment in multi-vendor networks.
[7] *See* 47 U.S.C. § 906 statutory objective (vii): (vii) Promoting and deploying network function virtualization to facilitate multi-vendor interoperability and a more diverse vendor market.
[8] *See* America's AI Action Plan, released in July 2025.

5G and future 6G networks. Generally, stakeholders consistently highlighted AI's transformative potential and cited a need to invest in use cases that can embed AI solutions into radio access networks, creating a robust, open marketplace for authenticated third-party developers to access large amounts of data.

NOFO Background

AI functionality is expected to be foundational in next-generation networks, and, at the same time, networks will use AI for dynamic, continuous innovation, including optimizing performance and maximizing spectrum use. United States industry can be leaders in the development, design, production and export of AI-native infrastructure, revolutionizing mobile communications. The U.S. is positioned to take the lead in the creation of a new AI-native network fabric which may provide new user experiences supported by U.S.-based technology and move the U.S. back into a leadership position in mobile communications.

The focus of this NOFO is to accelerate the development and deployment of an AI-native network fabric and its direct enablement of one or more commercially-viable, exportable business cases via a supporting demonstration.

This NOFO also enables the opportunity to showcase the security benefits of an AI-native network architecture. Recent security breaches have demonstrated the need for rigorous network security in mobile networks. This funding opportunity emphasizes integrating cybersecurity directly into the architecture of AI-native networks to promote secure next-generation mobile infrastructure. Applicants will need to demonstrate how security is integral to the network architecture, and they may also choose to feature security as a commercially viable business case demonstration.

Specifically, applicants must address the following four (4) requirements in their Project Narrative (see ***Section 4*** for details):

1) **AI-Native Network Fabric:** Provide a secure compute environment capable of supporting AI applications, including those leveraging network data exposure, mobile telecommunications, and other workloads at any point in the network simultaneously.

2) **Security Plan:** Ensure that cybersecurity is integrated into the design, development, operation, and maintenance of AI-RAN solutions by presenting a security plan. The security plan shall include a security architecture, AI/Machine Learning (ML) security features, and demonstrate alignment with existing AI security frameworks.

3) **Business Case:** Provide a business case demonstrating commercial viability and exportability of one or more services uniquely enabled by the AI-native network fabric proposed in the application. The business case must have sufficient detail and supporting data to readily demonstrate commercial viability and exportability of the proposed service(s), including sufficient investment return to support scaling for broad deployment.

4) **Field Demonstration:** Demonstrate the service(s) defined in the business case via the proposed AI-native RAN solution (including proposed security) in a field environment, including the collection of necessary data to confirm the business case projections.

Open-source Software

NTIA encourages, but does not require, the use or development of open-source software in the solutions developed under this NOFO including, but not limited to, Open Centralized Unit Distributed Unit (OCUDU)[9] or other Open-Source RAN software.

[9] https://ocudu.org

Section 2 – Eligibility

This section describes the eligibility requirements for this NOFO, including eligible vs. ineligible entities, anticipated award amount, cost share, period of performance, and place of performance.

A comprehensive list of required application materials can be found in *Section 5*.

2.1 Summary of Eligibility Requirements

Description	Requirement
Eligibility	Applicants must demonstrate they are capable of developing and commercially selling and/or deploying a solution that leverages a secure compute environment to enable native AI capabilities in the RAN. The applicant must be organized under the laws of the United States or a State thereof, with its principal place of business in the United States. (See *Section 2.2* for additional requirements).
Anticipated Award Range	Up to $25,000,000
Cost Share	Minimum 50% of total project cost.
Period of Performance	Up to 18 months.
Place of Performance	All activities shall be done in the United States, its territories, and possessions. Activities may not involve an entity or occur within a jurisdiction described in *Section 2.2.2* or a "Country of Concern" or "Covered Nation," as defined in *Appendix A - Glossary of Terms*.

2.2 Eligibility Requirements

2.2.1 Eligible Entities

Applicants must meet the following requirements:

a) The applicant must be capable of developing and commercially selling and/or deploying a solution that leverages a secure compute environment to enable native AI capabilities in the RAN. This capability must be demonstrated in application materials (see *Section 4.7*).

b) The applicant must be organized under the laws of the United States or a State thereof, with its principal place of business in the United States. Any subsidiary, affiliate, or branch whose ultimate parent entity is organized under the laws of a foreign jurisdiction or has its principal place of business outside the United States is ineligible to be an applicant. This information will be validated by the applicant's SAM Registration and SF-328. If the applicant does not meet this requirement, the application ***will be disqualified.*** See ***Section 2.2.2.*** for additional information regarding ineligible entities.

All participants (which include subrecipients, contractors, and any other funded or unfunded entity other than the applicant; see ***Appendix A – Glossary*** for full definition of "participants") may be organized under the laws of a foreign jurisdiction and have their principal place of business outside the United States, ***except*** in the circumstances described in ***Section 2.2.2.***

2.2.1.1 Maximum Number of Applications

Eligible entities (i.e., applicants) may submit no more than one (1) application proposing no more than one (1) project per application. The applicant is the lead entity, i.e., the organization submitting the application package on Grants.gov using a unique SAM registration. There is no restriction on the number of applications in which an entity may participate as a subrecipient, contractor, consultant, or any other type of allowable partnership.

2.2.1.2 Past Award Recipients

Entities that have received funding from past Innovation Fund grants are eligible to apply for funds under this NOFO, if the entity otherwise meets the appropriate eligibility requirements defined in the NOFO.

2.2.2 Ineligible Entities

As described below, certain entities are not eligible to receive grants or participate in grant-funded activities under this NOFO. Ineligible entities include, but are not limited to, any applicant or participant that is:

a) Incorporated or has their principal place of business in a country of concern, as defined in Sec. 8521 of the 2026 National Defense Authorization Act (Pub. L. 119-60);

b) Owned or controlled directly or indirectly, through a majority voting or equity interest, individually or in aggregate, by:

- A country of concern as defined in Sec. 8521 of the 2026 National Defense Authorization Act (Pub. L. 119-60);
- An entity or national of a country of concern as defined in Sec. 8521 of the 2026 National Defense Authorization Act (Pub. L. 119-60);
- A foreign entity of concern;[10]

[10] *See* 15 U.S.C. § 4651(8) and 15 C.F.R. § 231.104, subject to any further rulemaking promulgated by the Department of Commerce.

- An organization identified on the People's Republic of China (PRC) Military Companies List established in accordance with Section 1260H of the *FY21 NDAA*;

- An organization included on the System for Award Management (SAM) Exclusion List;

- An organization included on the International Trade Administration's Consolidated Screening List (CSL);[11] or

- An organization identified as a provider of covered equipment and services in the Federal Communications Commission's list of Equipment and Services Covered by Section 2(a) of the Secure and Trusted Networks Act of 2019.

Applicants must conduct due diligence to ensure that all proposed participants are eligible entities under this NOFO. NTIA will review applications for involvement of ineligible entities and will not approve any applications that raise unacceptable concerns with respect to promoting a more secure, diverse, sustainable, and competitive wireless technology supply chain. For example, an entity—through control, access to information, or other mechanisms—may pose an undue risk to a project or U.S. national security interests.

All applicants are required to provide information via the Standard Form (SF)-328 at the time of application to enable an initial assessment of these issues.

NTIA may also require additional information, beyond the scope of the SF-328 form, to enable identification and mitigation of other concerns and national security risks posed by involvement of certain entities that may arise after an application is approved.

For example, NTIA may request records about participants in Innovation Fund awards in the course of monitoring and/or audit activities to ensure compliance with this requirement, in accordance with ***Section 8.2***. Awardees shall be prepared to provide records demonstrating ownership and control and shall obtain sufficient information from

[11] The Consolidated Screening List (CSL) is a consolidation of multiple export screening lists of the Departments of Commerce, State, and the Treasury. The CSL may be used as an aid in conducting electronic screens of potential parties to regulated transactions; however, applicants should be aware that the underlying lists, not the CSL, provide the authoritative information for determining eligibility under this NOFO. Ineligible entities for this NOFO include any applicant or participant that is owned or controlled by an organization included in any of the lists that comprise the CSL, including but not limited to the Bureau of Industry and Security's Entity List (15 CFR part 744, supplement no. 4) and the Department of the Treasury's list of Non-SDN Chinese Military Industrial Complex Companies (NS-CMIC List). In the event that a company, entity, or person on the list appears to match a party potentially involved in an export transaction, additional due diligence should be conducted before proceeding. Prior to taking further action, to ensure full compliance with all of the terms and conditions of the restrictions placed on the parties on this list, the applicant must check the official publication of restricted parties in the Federal Register. They should also check the official lists of restricted parties maintained on the websites of the Departments of Commerce, State, and the Treasury.

participants for NTIA to understand the ownership and control of participants in grant-funded activities.

2.2.3 Available Funding

NTIA may award up to $53,000,000 in total funding under this NOFO.

2.2.3.1 Anticipated Award Amounts

The amount of funding anticipated is up to $25,000,000 per award. This is not a mandatory maximum; however, applicants requesting funding amounts above $25,000,000 must provide a reasonable explanation for the variance. Applicants ***may not*** request more than $50,000,000 (see ***Section 2.2.3.2*** regarding statutory limitation on award amounts). Relative cost effectiveness may be considered in the Selecting Official criteria (see ***Section 7.1.4***).

2.2.3.2 Statutory Limitation on Award Amounts

In accordance with 47 U.S.C. § 906(a)(1)(B)(ii), the cumulative amount of federal funding awarded to a single awardee for a single focus area may not exceed $50,000,000. As such, applications requesting more than $50,000,000 in federal funding under this NOFO ***will be disqualified***.

There is no statutory limitation on the amount of cost share provided by an applicant. Applications with a total project cost exceeding $50,000,000, but that request less than $50,000,000 in federal funding, remain eligible.

2.2.4 Cost Share

To ensure the efficient use of taxpayer dollars, **applicants must provide a minimum of 50% of the total project cost as cost share.** This can include cash or in-kind contributions. Please note applicants claiming the up to 15 percent de minimis indirect cost rate are prohibited from applying those funds toward cost share.

Applicants should structure the finances of their projects in a way that maximizes private sector contributions and minimizes the need for government incentives. NTIA will evaluate the degree to which an applicant, through its funding request, leverages private investment, cash and in-kind contributions, and other sources of funding as a means of demonstrating its commitment to project success.

All allocable contributions to cost share must meet the requirements in 2 C.F.R. § 200.306, 2 C.F.R. § Part 200 Subpart E – Cost Principles, and other allowable cost requirements described herein.

Cost share percentage will be calculated based on information provided in the SF-424, Section 18, as follows:

- All non-federal sources of funding will be summed (18b through 18e).
- Cost share percentage will be calculated by dividing the non-federal funding by the total project cost (18g).
- Calculated cost share percentage will be *rounded down* to the nearest integer value (e.g., a cost share of 49.8% will be rounded down to 49%).

Applications that do not include the minimum 50% cost share, as calculated above, ***will be disqualified***. Applicants should not rely on funding from this NOFO to displace private capital or enable outsized returns relative to commercially reasonable expectations for similar projects.

For applications that include a higher cost share than the minimum required, the cost share may be considered as a component of the relative cost effectiveness of an application and may be used by the Selecting Official as a factor in making award decisions (see ***Section 7.1.4***).

2.2.5 Period of Performance

The period of performance (POP) of awards is expected to be up to 18 months. The POP may be fewer than 18 months but shall not exceed 18 months from the date of award.

While extensions are possible under this NOFO (see ***Section 2.2.5.1*** below), the application will be assessed for risk of exceeding the mandated POP.

2.2.5.1 POP Extensions

Grant recipients submitting a request for an extension of the POP must include the justification for such an extension and describe all relevant circumstances. The Assistant Secretary may recommend that the NIST Grants Office extend the POP by not more than one (1) year if the grant recipient certifies to the Assistant Secretary's satisfaction that:

a) The grant recipient has a plan for use of the grant funds; and

b) Work completed during the extended time would provide sufficient value to advancing goals outlined in the NOFO and accepted proposal, as determined by the government.

Requests for extensions will be granted at the sole discretion of the Assistant Secretary or their designee. Per Department of Commerce policy, the POP, inclusive of all extensions, shall not exceed five (5) years.[12]

2.2.5.2 Reversion of Funds

[12] *See* U.S. Department of Commerce, Federal Financial Assistance Manual (March 31, 2025), Section 9.I.2.a.1.

Any remaining unspent funds at the end of a grantee's POP, inclusive of any extensions granted, will be de-obligated.

2.2.6 Place of Performance

All project activities shall take place in the United States, its territories, and possessions. This includes, but is not limited to, design, development, prototyping, initial testing, and field demonstration activities. NTIA may elect to waive this requirement for certain field demonstration activities if presented with compelling evidence that such activities would materially advance the objectives of this NOFO.

Under no circumstances may activities involve an entity, or occur within a jurisdiction, described in ***Section 2.2.2.*** or defined in ***Appendix A - Glossary of Terms*** (see "Country of Concern" and "Covered Nation").

Section 3 – Technical Maturity Requirements

3.1. POP Entry Criteria

Projects funded under this NOFO may begin the POP at any technical maturity level.

3.2 POP Exit Criteria

Before exiting the POP, projects must meet the level of technical maturity commensurate with that required to support the Field Demonstration described in its Project Narrative (see ***Section 4.3***).

At a minimum, projects funded under this NOFO shall exit the POP with a working hardware prototype, as defined in ***Appendix A – Glossary of Terms*** (see "Prototype"), and beta-level software. The applicant shall conduct a working demonstration of the hardware prototype and software in a field environment. During the field demonstration, the applicant shall collect data necessary to confirm the business case projections outlined in the Project Narrative, i.e., to demonstrate the commercial viability of the solution.

Requiring a field demonstration of a working hardware prototype and beta-level software before exiting the POP will validate the technical and business case viability of the responses by providing real-life examples of functionality and alignment with business case hypotheses. It will generate data to facilitate investments that support the promotion of network virtualization and security, market competition, and the deployment of open and interoperable equipment in line with Innovation Fund goals i, ii, and vi (see ***Section 1.2***). NTIA will not fund proposals that do not meet the desired exit criteria (e.g., proposals too speculative to be commercially feasible or basic research that is outside the scope of this statutory authority).

Section 4 – Project Narrative

Note: *Project Narratives must not exceed 50 pages in length (excluding cover page and references).*

This section describes the specific content that applicants must include in their Project Narrative. The Project Narrative is one component of a complete application. A complete list of required application materials can be found in ***Section 5***.

A high-level review of Project Narratives will be conducted in Initial Review (see ***Section 7.1.1***). Project Narratives that do not include one or more of the elements listed below may not move forward to Merit Review and may not be considered for award.

The Project Narrative must include the following content:

- Executive Summary (see ***Section 4.1***)
- Description of AI-Native Network Fabric (see ***Section 4.2***)
- Description of Field Demonstration (see ***Section 4.3***)
- Business Case (see ***Section 4.4***)
- Security Plan (see ***Section 4.5***)
- Work Plan Summary (see ***Section 4.6***)
- Qualifications of Applicant and Unique Aspects of Proposal (see ***Section 4.7***)
- Participants (see ***Section 4.8***)
- Facilities and Equipment (see ***Section 4.9***)

4.1 Executive Summary (Max 1 Page)

Provide a short executive summary of the proposed project. It is important that the executive summary focuses only on salient aspects of the broader Project Narrative, including how the proposed project addresses the AI-native network fabric (see ***Section 4.2***), field demonstration (see ***Section 4.3***), business case (see ***Section 4.4***), and security plan (see ***Section 4.5***) requirements detailed below.

If the project is selected for funding, the executive summary may be used by NTIA in award announcement materials and posted on the public NTIA.gov website. Therefore, applicants should ensure that no proprietary or business confidential information is included in the executive summary.

4.2 Description of AI-Native Network Fabric

Note: *NTIA recommends that applicants allocate no more than 10 pages to the description of the AI-native network fabric. When addressing the requirements listed below, the applicant must discuss how the proposed solution will readily scale to a broad deployment.*

The rapid expansion of computing capacity to accommodate future AI-enabled functions is an opportunity to accelerate the intersection of wireless telecommunications with traditional

IT. New processing capabilities have the ability to process new AI applications, traditional IT, and RAN-related network functions on the same set of infrastructure simultaneously. This presents an opportunity to consolidate computing resources and simplify computing resource management, reducing the total cost of ownership.

The AI-native network fabric requires an architecture that allows for the full functionality and seamless exchange of data.

Applicants shall describe the proposed AI-native network fabric, including how it will meet the following requirements.

Requirement – The minimal RAN network configuration to support the proposed solution shall, at a minimum, be compliant with 3GPP 5G NR Stand Alone Release 18 specifications and the latest releases of the O-RAN Alliance specifications per the March 2026 Specification Train (Release 5), as applicable to the proposed solution and prototype. If an applicant chooses to use a later 3GPP 5G NR release or O-RAN Alliance specification, it should be documented in the Project Narrative.

Requirement – Applicants must clearly define and discuss how their network fabric and its supporting a secure compute platform will seamlessly support at a minimum, the following workloads:

- **Mobile Telecommunications:** Mobile telecom workload functions High-PHY, MAC, RLC, PDCP, SDAP, RRC, and Core. While the Radio Unit (RU) functionality will be required for the demonstration, the AI-native network fabric as considered by this NOFO ends at the Open Front Haul interface as defined by O-RAN Alliance specifications.

- **AI:** Massively parallel matrix math and other processes required to support various AI activities enabled by such systems, LLMs and other neural networks. For example, AI workloads can include model training, inference, data processing, and specific applications such as natural language processing (NLP), computer vision, and generative AI.

For example, applicants could propose a solution including AI workloads associated with network telemetry data while simultaneously supporting mobile telecom workload functions High-PHY, MAC, RLC, PDCP, SDAP, RRC, and Core.

Requirement – Applicants must provide the following details for the AI-native network fabric:

- **Network Architecture**

    - Physical Layer (e.g., primary and edge): Provide detailed information on the physical and logical locations of compute resources and such resource capacity.

  - Allocation (e.g., orchestration, load management): Describe how common compute resources are shared to enable both AI applications and other processing capabilities necessary to enable RAN functionality.

- **Computing**
  - Processing (e.g., types, performance): Describe processor types, FLOPS (Floating-Point Operations Per Second) and processor clock speeds. Applicants may also describe the number of available processors and overall processing capacity.
  - Virtualization (e.g., VMs, containers): Provide details related to shared or stand-alone OS kernels enabling virtualized computing.
  - Orchestration (e.g., Kubernetes, cluster managers): Describe the orchestration framework used to enable shared workloads in a cloud-based environment. Detail load balancing, fail-over, scaling, automation, and update policy enforcement mechanisms.
  - Acceleration (e.g., GPU/AI accelerators, SmartNICs): Detail the use of processing accelerators including types, where in the architecture they occur, and the functions they directly enable.

- **Networking**
  - Connectivity (e.g., protocols, metrics): Provide detailed information on how data is moved between network elements including specific protocols leveraged at Layer 2 for backplanes and wired data center interconnectivity. Proposals should include throughput and latency metrics.

- **Data**
  - Storage (e.g., block, object, distributed file systems): Provide detailed information on data storage architectures and how data is compartmentalized and accessed across various network layers.
  - Services (e.g., streaming, caching, databases): Describe how data is held and accessed by AI-enabled models, agents and applications.

- **Management**
  - Observability (e.g., metrics, logs, tracking): Describe how computing infrastructure is monitored for performance and other computing KPIs.
  - Operations (e.g., service Mesh & APIs): Describe how challenges associated with traffic management, observability, and resiliency are measured and monitored.

4.3 Description of Field Demonstration

Note: *NTIA recommends that applicants allocate no more than 10 pages to the description of the field demonstration. When addressing the requirements listed below, the applicant must discuss how the proposed solution will readily scale to a broad deployment.*

Requirement: All applicants must conduct a field demonstration during their period of performance (POP). Specifically, the applicant must conduct a working demonstration of the provision of the service(s) defined in the business case (see Section 4.4) via the proposed AI-native RAN solution in a mobile communications field environment. This demonstration must include simultaneous active AI workloads and active mobile communications workloads. The field demonstration must include the generation and collection of data necessary to confirm the business case projections.

Applicants shall provide a description of how the field demonstration meets the following requirements:

- **Environment:** The prototype must be demonstrated in a field environment that is the same as or very similar to the projected commercial deployments.
- **Scale:** The demonstration must be conducted in such a manner to demonstrate the solution would readily scale to a broad mobile communications marketplace for export and domestic use.
- **Data Collection:** Quantitative and qualitative data points collected from the demonstration must confirm operational and business targets.
- **Plans:** Detailed plans for the prototype demonstration, including, but not limited to, location (with maps and other depictions necessary to fully describe the environment), architecture (physical and logical), equipment and vendor(s), interfaces, projected coverage, methods of testing, and success criteria.

4.4 Business Case

Note: *NTIA recommends that applicants allocate no more than 10 pages to the business case. When addressing the requirements listed below, the applicant must discuss how the proposed solution will readily scale to a broad deployment.*

The rapid emergence of AI's application to mobile communications is driving rapid change and pressing the industry to move forward quickly. However, as has been demonstrated by the deployment of 5G systems, without a commensurate increase of revenue generation or operational savings, technology is only an enabler. The key drivers to broad adoption and deployment are the business cases that define and demonstrate new revenue streams and/or significant operational savings enabled by the new technology.

Requirement – Applicants shall provide a business case demonstrating commercial viability, including export potential, of provision of services(s) *uniquely* enabled by the AI-native network fabric proposed. The business case must have sufficient detail and supporting data to readily demonstrate commercial viability of the proposed service(s), including sufficient return to support scaling for broad adoption and deployment. At a minimum, the business case must include the following:

- List of assumptions made within the business case and details supporting those assumptions
- Definition of specific service(s) including, but not limited to, descriptions of the following items
    - Target customer
    - Requirement to be supported by a mobile communications system
    - Expected user equipment/devices to be supported
    - Discussion of data required, its source(s), and if access to such data has been approved by its owner
    - Discussion of the service value chain (e.g., how value is exchanged, who the key players in the value chain are, and the motivations of each player)
    - Alternative options that could provide the same service (demonstration of unique opportunity proposed by applicant)
- Definition of how the service(s) are uniquely enabled by the proposed AI-native network fabric and the features enabled by that network fabric
- Pro forma (5 year) financial projections to support the commercial viability – revenue and/or cost savings sufficient to support broad deployment of the specific service set including, but not limited to, the following:
    - Cost projections
    - Revenue and/or savings projections
    - Proposed revenue model
    - Return on Investment (ROI) analysis
- Analysis of commercial, technical, and other risks and the applicant's strategies for mitigating them.
- Description of how the commercial deployment of the service(s) will help export U.S. AI technology and increase the U.S.' share of the wireless communications market.

4.5 Security Plan

Note: *NTIA recommends that applicants allocate no more than 10 pages to the security plan. When addressing the requirements listed below, the applicant must discuss how the proposed solution will readily scale to a broad deployment.*

It is the policy of the U.S. to strengthen the security and resilience of its critical infrastructure against all hazards, including physical and cyber risks. Given the transformative impact of AI-powered Radio Access Networks on future critical telecommunications infrastructure, entities receiving funds through this program must ensure that cybersecurity is integrated into the design, development, operation, and maintenance (including, but not limited to, Life Cycle Management) of AI RAN solutions developed through this program, with particular attention to the unique security challenges introduced by artificial intelligence and machine learning systems.

Requirement – Applicants shall provide a Security Plan that demonstrates inclusion of security into the overall solution architecture, application of security principles to AI/ML processes, and alignment with existing security frameworks. Given the expected maturity of the solution at the end of the project, it is not expected, but encouraged, that proposed security features will be fully implemented into the demonstration. The development of a security plan facilitates the inclusion of security in the final product.

- **Security-by-Design and Post-Quantum Cryptography Readiness:** All projects shall incorporate "security-by-design" principles following industry best practices for telecommunications and AI/ML systems. This includes consideration of security controls defined in 3GPP Security Specifications (TS 33.501, TS 33.210) and O-RAN WG11 Security Requirements (published by ETSI in TS 104 104 (2026 versions or later), TS 104 107). AI/ML security should specifically consider NIST AI Risk Management Framework (AI RMF 1.0) and NIST AI 600-1 for generative AI (if employed) or their successor to manage AI/ML risks. Projects shall assess current cryptographic implementations and consider a migration plan to post-quantum cryptography using NIST IR 8547 and other such industry guidance.

- **Software and Hardware Security:** All projects shall use DevSecOps approaches and develop Software Bill of Materials (SBOM) per NTIA minimum requirements using SPDX 2.3+ or CycloneDX 1.4+ format, and Hardware Bill of Materials (HBOM) per CISA HBOM Framework. Both shall include Vulnerability Exploitability eXchange (VEX) for known vulnerabilities. AI models should be cryptographically signed with documented provenance. Projects involving GPU servers, edge compute, or RAN equipment should implement hardware root of trust (TPM 2.0 or equivalent) with secure boot and platform integrity attestation.

- **AI/ML-Specific Security Requirements:** Projects with AI/ML components may address: (a) Model Security including cryptographic signing, integrity and confidentiality, monitoring for model poisoning, drift or degradation, and applying mitigation measures; (b) Attach Resilience against model evasion attacks, via periodic testing against known relevant adversarial TTPs and application of mitigating measures; (c) API security (for access to model training, model repository/management, inference, and operations): endpoint authentication/authorization, rate limiting, input/output validation ; and (d) if used, AI Agent Security including certificate-based authentication, least privilege principles, behavioral monitoring, isolation, and emergency kill switches.

- **Cybersecurity Framework Compliance and Monitoring:** Projects shall implement NIST Cybersecurity Framework v2.0 (all six functions) and CISA CPGs. Capabilities may include centralized logging/SIEM, real-time threat detection with behavioral anomaly detection, and vulnerability scanning with remediation SLAs (Critical: 14 days, High: 30 days, Medium: 90 days).

- **Product Security Plan Requirements:** The Security Plan may include: (a) Security Architecture diagrams showing trust boundaries, zones, data flows, authentication/authorization, encryption, and AI/ML architecture; (b) Compliance Matrix mapping to NIST CSF v2.0, CISA ZTMM v2.0, O-RAN WG11 specs, and NIST AI RMF; (c) Risk Assessment covering assets, threats (including AI-specific), vulnerabilities, and risk treatment; (d) AI/ML Security Plan for model security, training data protection, and agent monitoring; and (e) Supply Chain Security with component provenance and prohibited vendor compliance (no entities from FCC Covered List, DoD Section 1260H, SAM.gov Exclusion List, or BIS Entity List, and no covered telecommunications equipment or services in accordance with 2 C.F.R. 200.216).

At NTIA's discretion, complex projects may be required to develop a detailed Project Cybersecurity Plan through a Special Award Condition (SAC) at time of award. Failure to meet cybersecurity requirements may result in payment suspension, corrective action requirements, or award termination. Critical security incidents or use of prohibited vendors will trigger immediate review and potential enforcement action.

4.6 Work Plan Summary

While a separate, detailed work plan is required (see ***Section 5.1.1(j)***), the Project Narrative must include a summary of the work plan that ensures reviewers can understand the scope of work proposed by the applicant, including major milestones and deliverables.

4.7 Qualification of Applicant and Unique Aspects of Proposal

Explain how the applicant is qualified to develop and commercially sell and/or deploy a solution that leverages a secure compute environment to enable native AI capabilities in the RAN. Provide examples of past success of relevant products. NTIA is particularly interested in evidence that the applicant has successfully scaled and commercially sold a solution broadly across geographic regions and customer bases. In addition to concrete examples of past experience, NTIA expects applicants to describe how their financial, human, and other resources will enable it to develop, scale, and sell an AI-native solution as described in this NOFO.

Describe the unique aspects of the work proposed and how it differs from presently available solutions. The unique aspects described shall also be reflected in the business case (see ***Section 4.4***).

4.8 Participants

Provide the names, roles, and level of involvement of all participants that will play a key role in executing project activities. Identify whether the participant is a partner (as defined in ***Appendix A – Glossary of Terms***), subrecipient, or contractor. If the participant is a partner or subrecipient, the information provided must be consistent with the information in the partner or subrecipient's Letter of Commitment (see ***Section 5.1.1(l)***), which is a required submission of all partners and subrecipients that have a role in executing the activities outlined in the Project Narrative.

4.9 Facilities And Equipment

Provide a description of, and information regarding, the availability and location of instrumentation and physical facilities used for project activities, including manufacturing. Any new facility or equipment costs, including software and services, should be itemized and justified.

Section 5 – Required Application Materials

This section lists and provides instructions for all the materials applicants must include in their application package.

NOTE:** Individual submissions containing multiple proposals **will be disqualified.

5.1 Content and Form of Applications

Each application requires the following documentation:

a) SF-424, Application for Federal Assistance
b) SF-424A, Budget Information for Non-Construction Programs
c) Project/Performance Site Locations Form
d) CD-511, Certification Regarding Lobbying
e) SF-LLL, Disclosure of Lobbying Activities (if applicable)
f) SF-328, Certification Pertaining to Foreign Interests
g) Budget Narrative and Justification
h) Indirect Cost Rate Agreement (if applicable)
i) Project Narrative
j) Work Plan
k) Intellectual Property Plan (if applicable)
l) Letter(s) of Commitment for Partners and Subrecipients
m) Resumes of Key Personnel
n) Domestic Content
o) Other Materials (Optional)

Items 'a' through 'e' listed above are part of the standard application package in Grants.gov and can be completed through the download application process in Grants.gov.

Additional attachments, including but not limited to the items found in 'f' through 'o' above, must be uploaded to Grants.gov as attachments to field 15 of the SF-424 form by clicking on "Add Attachment".

5.1.1 Instructions for Application Documentation

This section contains additional details and instructions for each of the application components listed above.

a) SF-424, Application for Federal Assistance

The SF-424 must be signed by an authorized representative of the applicant organization.

- Item 8.d. Zip/Postal Code field, shall reflect the Zip code + 4 (#####- ####) format.
- Item 12 shall list the NOFO number NTIA-PWSCIF-26-01

- Item 15 shall list the title of the proposal.
- Item 18 shall list the total budget information for the duration of the project.
- The list of certifications and assurances referenced in Item 21 is contained in the Federal Financial Assistance Certifications and Representations (Certs and Reps) as part of the SAM.gov entity registration.

b) SF-424A, Budget Information for Non-Construction Programs

The budget shall reflect anticipated federal and non-federal expenses for the entire project, considering all potential cost increases and cost of living adjustments.

- The applicant shall include each year of the project on the SF-424A form that appears as part of the mandatory forms in the Grants.gov application package.

- Section A:

    - Line 1, column (a) shall be entered as Public Wireless Supply Chain Innovation Fund – AI-Native RAN, CFDA 11.038, or an abbreviation thereof.
    - Line 1, Column (b) shall enter the CFDA number of "11.038"
    - Line 1, Column (e) shall list the total federal budget amount requested for the term of the award.
    - Line 1, Column (f) shall list the total non-federal cost share amount

- Section B:

    - Column (1) shall reflect the federal and non-federal costs for each object class category, to include indirect charges, for the first year of the award.
    - Column (2) shall reflect the costs for each object class category, to include indirect charges, for the second year of the award, if applicable.

- Section C shall list the sources and amount of non-federal cost sharing.

- Section D requires a breakdown of the first year's federal share and non-federal share of the budget by quarter.

- Section E, Line 16 requires the budget estimate of federal funds needed for each year of the project.

    - Column (b) shall be the budget estimate for the first year
    - Column (c) shall be the budget estimate for the second year, if applicable

c) Project/Performance Site Locations Form

Applications shall include the location of all places of performance for both the applicant and any subrecipients. Include contractor work locations only if a contractor facility is used to complete work specified in the work plan.

- For U.S. locations, the following is required:
    - ZIP + 4 code format (#####- ####)
    - 6-character congressional district format (AA-###)

- For non-U.S. locations, select the country first to update the required fields

- Additional locations must be added using the "Next Site" button, which will generate additional site fields/locations. Location information added using the "Add Attachment" feature is not allowed.

d) CD-511, Certification Regarding Lobbying

Enter "NTIA-PWSCIF-26-01" in the Award Number field. Enter the title of the application, or an abbreviation of that title, in the Project Name field.

e) SF-LLL, Disclosure of Lobbying Activities (if applicable)

Click the hyperlink in ***Section 5.1*** to access instructions.

f) SF-328, Certification Pertaining to Foreign Interests

Click the hyperlink in ***Section 5.1*** to access instructions.

g) Budget Narrative and Justification

Each applicant must complete and submit the Budget Narrative and Justification Excel spreadsheet provided on Grants.gov in the "Related Documents" section under "View Grant Opportunity." The form must be uploaded to Grants.gov as an attachment, **in Excel format,** to field 15 of the SF-424 form by clicking on "Add Attachment." Applicants must use the Budget Narrative and Justification Excel spreadsheet provided on Grants.gov – Budget Narrative and Justifications that do not use the provided Excel spreadsheet, differ in formatting, or are submitted in PDF form may be disqualified from review. All information included in the Budget Narrative and Justification must support the dollar amounts identified in the SF-424 and SF-424A and demonstrate that the project or activity meets the eligible use requirements as per this NOFO.

The Budget Narrative and Justification shall include the necessity and the basis for the cost, as described below. Proposed funding levels must be consistent with the project scope, and only allowable costs should be included in the budget. Federal project funding should not substitute private capital or enable outsized returns relative to commercially reasonable expectations for similar projects. NTIA will evaluate whether project costs align with relevant market benchmarks to ensure that taxpayer dollars are efficiently spent. Information on cost allowability is available in the *Uniform Administrative*

Requirements, Cost Principles, and Audit Requirements for Federal Awards,[13] which apply to awards in this program.

The Budget Narrative and Justification must explain the rationale for the applicant's proposed cost share. As part of this explanation, the applicant should directly show how the funding requested will incentivize the applicant to make investments in the proposed solution(s) that would not occur in the absence of the incentives. The application should also explain why their funding request is appropriate based on expected risks and returns of the project, historical projects of similar nature, or other relevant market benchmarks.

This section will be reviewed to determine if all costs are reasonable, allocable, allowable, and necessary as defined in 2 C.F.R. Part 200 Subpart E, Cost Principles.

Information required for each budget category is as follows:

1) **Personnel** – At a minimum, the budget narrative and justification for all personnel shall include the following: job title, commitment of effort on the proposed project in terms of average number of hours per week or percentage of time, salary rate, total personnel charges for each identified position on the proposed project, description of the role of the individual on the proposed project, and the work to be performed. The budget narrative and justification shall include a description of the applicant's investments in employee training, education, and recruitment, as well as other efforts to train and build a skilled workforce, if the applicant makes such investments in their proposal.

2) **Fringe Benefits** – Fringe benefits for each position shall be identified separately from salaries and wages and based on rates determined by organizational policy. The items included in the fringe benefit rate (e.g., health insurance, parking, etc.) shall be charged under another cost category.

3) **Travel** – For all travel costs, the budget narrative and justification for travel shall include the following: destination; names or number of people traveling; dates and/or duration; mode of transportation, lodging, and subsistence rates; and description of how the travel is directly related to the proposed project. For travel that is yet to be determined, please provide best estimates based on prior experience. If a destination is not known, an approximate amount may be used with the assumptions given for the location.

4) **Equipment** – Equipment is defined as an item of property that has a useful life of more than one year and a per-unit acquisition cost of $10,000 or more (unless the organization has established lower levels). The budget narrative and justification shall list each piece of equipment, the cost, and a description of how it will be used and why it is necessary to the successful completion of the proposed project. Please note that any general use equipment (computers, etc.) charged directly to the award should be allocated to the award according to expected usage on the

[13] *See* 2 C.F.R. § 200.

project. Please note that all equipment equal to or over $10,000 per unit must be reported in the Equipment category. Equipment under $10,000 per unit must be reported under the Supplies category.

5) **Supplies** – Supplies are defined as all tangible personal property other than that described as equipment. Provide a list of each supply, and the breakdown of the total costs by quantity or unit of cost. Include the necessity of the cost for the completion of the proposed project.

6) **Contractual (i.e., Contracts or Subawards)** – Each contract or subaward shall be treated as a separate item. Identify the cost and describe the services to be provided and the necessity of the subaward or contract to the successful performance of the proposed project. Contracts are for obtaining goods and services for the applicant's own use and create a procurement relationship with the contractor. A subaward is for the purpose of carrying out a portion of a federal award and creates a federal financial assistance relationship with the subrecipient. Please note that a procurement to purchase equipment to support the project must report these costs under the Equipment category and **not** the Contractual category.

7) **Construction** – Construction costs are ***not*** allowed under this NOFO.

8) **Other Direct Costs** – For costs that do not easily fit into the other cost categories, please list the cost, and the breakdown of the total costs by quantity or unit of cost. Include the necessity of the cost for the completion of the proposed project. Only allowable costs can be charged to the award. Costs for independent validation and verification of the solution are allowable and must be itemized if incurred.

9) **Indirect Costs** – Commonly referred to as Facilities and Administrative Costs, Indirect Costs are defined as costs incurred by the applicant that cannot otherwise be directly assigned or attributed to a specific activity. The justification shall include a cost calculation that reflects the applicable indirect cost rate. Additionally, applicants must indicate in the budget narrative and justification if non-federal funds will be used to cover indirect costs and the dollar amounts of non-federal funds used.

   Indirect costs can be based on an approved Indirect Cost Rate Agreement (see Section 5.1.h) or by using the de minimis rate. In accordance with 2 C.F.R. § 200.414(f), applicants that do not have a current negotiated (including provisional) indirect cost rate (except for those non-federal entities described in Appendix VII, paragraph D.1.b. of 2 C.F.R. § 200) may elect to charge a de minimis rate of up to 15 percent of modified total direct costs (MTDC). Applicants proposing a de minimis rate, pursuant to 2 C.F.R. § 200.414(f), shall note this election as part of the Budget Narrative and Justification and an Indirect Cost Rate Agreement is not required. Applicants using the de minimis rate cannot list indirect costs as part of their cost share.

10) **Cost Share -** Applicants must provide details of all proposed cost share or matching contributions, including cash or in-kind contributions in the Budget Narrative and Justification. Applicants must identify the source and the amount for each contribution. Cost share provided by a subrecipient or contractor must be reflected in the Contractual–Subawards section of the Budget Narrative and Justification as well. Cash contributions must come from nonfederal sources; funds from other federal programs are not allowable as matching funds. In-kind contributions may include noncash donations such as property, goods, or services that directly benefit the project. All matching contributions must be necessary and allowable for the performance of the project. For additional cost share requirements see ***Section 2.2.4***

h) Indirect Cost Rate Agreement (if applicable)

If indirect costs are included in the proposed budget are based on the Indirect Cost Rate Agreement, provide a copy of the approved negotiated agreement if this rate was negotiated with a cognizant federal audit agency. If the rate was not established by a cognizant federal audit agency, provide a statement to this effect. If a successful applicant includes indirect costs in the budget and has not established an indirect cost rate with a cognizant federal audit agency, the applicant will be required to obtain such a rate in accordance with Section B.06 of the *Department of Commerce Financial Assistance General Terms and Conditions,* dated September 22, 2025.

i) Project Narrative

See ***Section 4***

j) Work Plan

Note: *Work Plans must not exceed 20 pages in length (excluding cover page).*

Provide a work plan detailing how the development and field demonstration of the hardware prototype and beta-level software will be conducted. The work plan shall include a project roadmap and a detailed milestone and deliverable schedule covering the POP.

The work plan shall also include all applicable testing phases, decision points, and milestones where technology readiness is expected to improve.

Applications that do not include one or more of the aforementioned elements may not move forward to Merit Review and may not be considered for award.

k) Intellectual Property Plan (if applicable)

Note: *The Intellectual Property Plan must not exceed 10 pages (excluding cover page).*

If the applicant contemplates retaining intellectual property rights related to work conducted under this NOFO or anticipates using federal or matching funds to pay IP royalties, IP filing fees, and/or costs related to counsel for patent and copyright matters, the applicant shall provide an IP plan describing any IP considerations anticipated during the POP. This includes, but is not limited to:

- Anticipated patent filings from the federally funded work.
- Rationale for any anticipated royalty expenses using federal funds during the POP, including to which entities royalties will be paid.
- Rationale for any other IP-related costs (e.g., filing costs, IP attorney fees, etc.) included in the project budget.
- Any standards-related activities contemplated in the proposal and rationale for how such activities further the goals of the Project Narrative and this program.
- Any IP-sharing provisions with proposed partners.
- Any IP management or protection plans proposed.
- Any plans to make software open-source.

See ***Section 8.2.10*** for more details.

l) Letters of Commitment from Partners and Subrecipients

Letters of Commitment must be submitted by all funded and unfunded partners and subrecipients (see ***Appendix A – Glossary*** for definitions of “partner” and “subrecipient”). For example, if an applicant cites an entity as a partner, then the application must include a Letter of Commitment from that entity, regardless of whether the entity is funded or unfunded. Contractors are not required to submit Letters of Commitment; however, all Letters of Commitment must include the following:

- Entity’s Unique Entity Identifier (UEI); if the entity does not have a UEI, they must include Form SF-328 as an attachment and include a note in the Letter of Commitment stating they have attached the form.
- Entity’s role in the project and overall level of participation, including whether the entity commits to share network data with/authorize network data access for project activities
- Description of how the entity and applicant plan to formalize their partnership after receiving an award (applies only if the entity is a partner as defined in ***Appendix A – Glossary of Terms***). ***Note:*** *Post-award, NTIA will ask all recipients to provide a Letter of Partnership, Memorandum of Understanding, or other type of partnership agreement with each partner prior to beginning the POP.*
- Qualifications of personnel actively involved
- Share of federal funding for the entity (if applicable)
- Voluntary committed cost-share (if applicable), including what specific services and/or products will be provided for any in-kind match

  - References to federal share and cost share should align with the submitted budget.
- Point of Contact at the entity for any inquiries regarding the Letter of Commitment

Letters of Commitment must be signed by a senior representative of the entity on the participating entity's letterhead.

m) Resumes of Key Personnel

Note: *In contrast to* [***Section 4.8***]*, which asks for information regarding participants (i.e., partners, subrecipients, and contractors), this section asks for resumes of key personnel (i.e., only the key individuals involved in project activities).*

Provide one-page resumes of key personnel involved in the project. Resumes must include contact information for the personnel. The total number of resumes provided must not exceed five (5), and the number of pages per resume must not exceed one (1). Any information beyond one (1) page for each resume and any additional resumes beyond five (5) will not be considered.

n) Domestic Content

Non-federal entity recipients and subrecipients must comply with the *Build America, Buy America Act (BABA),* if applicable to their project, which was enacted as part of the *Infrastructure Investment and Jobs Act §§ 70901-70927, Pub. L. No. 117-58 (2021)*; and *Executive Order 14005, Ensuring the Future is Made in All of America by All of America's Workers*.

The term "non-federal entity" for purposes of *BABA* includes States, local governments, territories, Indian tribes, Institutions of Higher Education (IHE), and nonprofit organizations. It does not include for-profit organizations.

The Buy America preference only applies to articles, materials, and supplies that are consumed in, incorporated into, or affixed to an infrastructure project. As such, it does not apply to tools, equipment, and supplies, such as temporary scaffolding, brought to the construction site and removed at or before the completion of the infrastructure project. Nor does a Buy America preference apply to equipment and furnishings, such as movable chairs, desks, and portable computer equipment, that are used at or within the finished infrastructure project but are not an integral part of the structure or permanently affixed to the infrastructure project.

It is NTIA's expectation that *BABA* requirements will not apply to the majority of applicants, given that most are expected not to meet the definition of a non-federal entity. Nevertheless, applicants who are non-federal entities or who have non-federal entities included in their application as subrecipients, contractors or partners must describe how they plan to meet any applicable legal requirements to utilize iron, steel, manufactured products and construction materials produced in the United States pursuant to *BABA §§ 70901-27*, or explain why such requirements do not apply.

o) Other Materials (Optional)

Any additional material the applicant seeks to include to demonstrate fulfilment of the eligibility criteria, Merit Review criteria, and Programmatic Review criteria set forth in this NOFO can be included in the application.

5.2 Application Document Format

All application documents, except those using prescribed forms, must meet the formatting and length requirements described in this section.

5.2.1 Document Format

Application documents must meet the following formatting requirements:

a) Figures, graphs, images, and pictures – Should be of a size that is easily readable or viewable and may be presented in landscape orientation
b) Font – Easy to read font (11-point minimum). Smaller type may be used in figures and tables but must be clearly legible.
c) Line spacing – Applicants may use single spacing or double spacing.
d) Margins – One inch top, bottom, left, and right margins.
e) Page Layout – Portrait orientation, except for figures, graphs, images, and pictures. Paragraphs are to be clearly separated from each other by double spacing, paragraph formatting, or equivalent.
f) Page Numbering – Number pages sequentially.
g) Page Size – Pages must be 8½ inches by 11 inches, excluding network or system diagrams.
h) Application Language – English.[14]
i) Typed Document – All applications, including forms, must be typed.
j) Document Format – Documents must be submitted in a DOCX, PDF, or Excel format, as applicable.

5.2.2 Page Limits

Note: *NTIA will not review pages that surpass the page limits set forth for each document below.*

The following documents are subject to page limits, excluding cover pages:

a) Project Narrative – 50 pages
b) Work Plan – 20 pages
c) Intellectual Property Plan – 10 pages

[14] *See* 2 C.F.R. § 200.111(a).

Section 6 – Application Submission

This section describes the application submission process that all applicants must follow.

NTIA will only accept applications submitted electronically via Grants.gov. Other methods of submission, including paper, email, and facsimile submissions, ***will not be accepted***.

6.1 Register to Apply through Grants.gov

Read the instructions below about registering to apply for Innovation Fund grants. Applicants should read the registration instructions carefully and prepare the information requested before beginning the registration process.

Organizations must have an active System for Award Management (SAM) registration, which provides a Unique Entity Identifier (UEI), and Grants.gov account to apply for grants. If individual applicants (those submitting on their own behalf) are eligible to apply for this funding opportunity, they need only refer to steps 2 and 3 below.

Creating a Grants.gov account can be completed online in minutes, but SAM registration may take weeks. Therefore, an organization's registration should be done in sufficient time to ensure it does not impact the entity's ability to meet required application submission deadlines. ***Application period extensions will not be provided due to delayed SAM registration.***

1) *Register with SAM:* All organizations (entities) applying online through Grants.gov must register with the System for Award Management (SAM). Failure to register with SAM will prevent your organization from applying through Grants.gov. SAM registration must be renewed annually.

2) *Create a Grants.gov Account:* The next step is to register an account with Grants.gov. Follow the on-screen instructions provided on the registration page.

3) *Add a Profile to a Grants.gov Account:* A profile in Grants.gov corresponds to a single applicant organization the user represents (i.e., an applicant) or an individual applicant submitting on their own behalf. If you work for or consult with multiple organizations, you can have a profile for each organization under one Grants.gov account. In such cases, you may log in to one Grants.gov account to access all your grant profiles. To add an organizational profile to your Grants.gov account, enter the UEI (Unique Entity Identifier) for the organization in the UEI field. If you are an individual applicant submitting on your own behalf, you do not need a UEI to add the profile.

4) *Electronic Business Point of Contact (EBiz POC) Authorized Profile Roles:* After you register with Grants.gov and create an Organization Applicant Profile, the applicant's request for Grants.gov roles and access is sent to the EBiz POC. The EBiz POC is then expected to log in to Grants.gov and authorize the appropriate roles, which may

include the Authorized Organizational Representative (AOR) role, thereby giving you permission to complete and submit applications on behalf of the organization. You will be able to submit your application online any time after you have been assigned the AOR role.

5) *Electronic Signature:* When applications are submitted through Grants.gov, the name of the organization applicant with the AOR role that submitted the application is inserted into the signature line of the application, serving as the electronic signature. The EBiz POC of the organization must authorize people who are able to make legally binding commitments on behalf of the organization as a user with the AOR role; this step is often missed, and it is crucial for valid and timely submissions.

6.2 Submit an Application for this NOFO via Grants.gov

Grants.gov applicants can apply online using Workspace. Workspace is a shared, online environment where members of a grant team may simultaneously access and edit different webforms within an application. For each NOFO, you can create individual instances of a workspace.

Applicants should be aware that the process of completing the Workspace can take some time. Therefore, applicants should budget enough time to prepare and submit the application before the package closing date.

1) *Create a Workspace:* Creating a workspace allows you to complete an application online and route it through your organization for review before submitting.

2) *Complete a Workspace:* Add participants to the workspace to work on the application together, complete all the required forms online or by downloading PDF versions, and check for errors before submission. The Workspace progress bar will display the state of your application process as you apply. As you apply using Workspace, you may click the blue question mark icon near the upper-right corner of each page to access context-sensitive help.

    a. *Adobe Reader:* If you decide not to apply by filling out webforms, you can download individual PDF forms in Workspace. The individual PDF forms can be downloaded and saved to your local device storage, network drive(s), or external drives, then accessed through Adobe Reader.

       Note: Visit the Adobe Software Compatibility page on Grants.gov to download the appropriate version of the software.

    b. *Mandatory Fields in Forms:* In the forms, some fields are marked with an asterisk and a different background color. These fields are mandatory fields that must be completed to successfully submit your application.

   c. *Complete SF-424 Fields First:* These forms are designed to fill in common required fields across other forms, such as the applicant name, address, and SAM UEI. Once it is completed, the information will transfer to the other forms.

3) *Submit a Workspace:* An application may be submitted through Workspace by clicking the "Sign and Submit" button on the "Manage Workspace" page, under the "Forms" tab. Grants.gov recommends submitting your application package **at least 24-48 hours prior to the close date** to provide you with time to correct any potential technical issues that may disrupt the application submission.

4) *Track a Workspace Submission:* After successfully submitting a workspace application, a Grants.gov Tracking Number (GRANTXXXXXXXX) is automatically assigned to the application. The number will be listed on the Confirmation page that is generated after submission. Using the tracking number, access the "Track My Application" page under the "Applicants" tab or the "Details" tab in the submitted workspace.

For additional training resources, including video tutorials, refer to: grants.gov/applicants/applicant-training

Applicant Support: Grants.gov provides applicants 24/7 support via the toll-free number 1-800-518-4726 and email at support@grants.gov. For questions related to the specific grant opportunity, contact the number listed in the application package of the grant you are applying for. If you are experiencing difficulties with your submission, it is best to call the Grants.gov Support Center and get a ticket number. The Support Center ticket number will assist NTIA with tracking and understanding background information on the issue.

6.3 Submission Dates and Times

Complete applications must be received through Grants.gov no later than 11:59 p.m. Eastern Time on September 9, 2026. Grants.gov will no longer accept applications starting at 12:00 a.m. on September 10, 2026. Complete applications or portions thereof submitted by postal mail, courier, email, or by facsimile will not be accepted/considered. All application forms and documents must be included with an applicant's complete application package submission through Grants.gov.

When developing the submission timeline, each applicant should keep in mind that: (a) all applicants are required to have active registrations in the electronic System for Award Management (SAM.gov); and (b) the free annual registration process in SAM.gov may take weeks. Please note that a federal assistance award cannot be issued if the designated recipient's registration in SAM.gov is not current at the time of the award. ***Application period extensions will not be provided due to delayed SAM registration.***

6.4 Timely Receipt Requirements and Proof of Timely Submission

All applications must be received by 11:59 p.m. Eastern Time on September 9, 2026. Proof of timely submission is automatically recorded by Grants.gov. An electronic date/time stamp is generated within the system when the application is successfully received by Grants.gov. The applicant's Authorized Official Representative (AOR), who submitted the application, will receive an acknowledgement of receipt and a tracking number (GRANTXXXXXXXX) from Grants.gov with the successful transmission of their application. The AOR will also receive the official date/time stamp and Grants.gov Tracking number in an email serving as proof of their timely submission.

When NTIA successfully retrieves the application from Grants.gov, and acknowledges the download of submissions, Grants.gov will provide an electronic acknowledgment of receipt of the application to the email address of the applicant's AOR. Again, proof of timely submission shall be the official date and time that Grants.gov receives your application. Applications received by Grants.gov after the established due date and time for the program will be considered late and will not be considered for funding by NTIA.

Grants.gov will provide either an error or a successfully received submission message in the form of an email sent to the applicant's AOR.

6.5 Material Revisions

An applicant shall not be permitted to make any material revision to its application after the submission deadline. NTIA may, however, request or accept clarifications, revisions or submissions for completeness that are non-material. It is at the discretion of the Assistant Secretary, or their designee, whether a revision is material or not.

6.6 Amendments

Any amendments to this NOFO or additional program guidance will be announced on Grants.gov and NTIA.gov. Applicants using Grants.gov Workspace will see an alert on the Manage Workspace page to update their application. Applicants who have signed up for email notifications will be automatically notified of the changes via email.

6.7 Material Representations and False Statements

Any statement made on any form or supporting document submitted as part of the complete application package will be treated as a material representation of fact upon which NTIA will rely in awarding grants.

It is a crime to knowingly make false statements to a federal agency. Misrepresentation of material facts may be the basis for denial of an application. Penalties upon conviction may include fine and imprisonment. For details concerning fraud, please refer to 18 U.S.C. § 1001.[15]

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[15] *See* 18 U.S.C. § 1001.

6.8 Public Disclosure of Applications

Applicants should be aware that NTIA may make all or portions of their applications for grants under the Innovation Fund Program publicly available as required under applicable federal laws. (See ***Section 8.2.9*** of this NOFO for additional information concerning the confidentiality of information contained in an application.)

Section 7 – Application Review

7.1 Application Review Process

All applications will be evaluated on a competitive basis. There are three stages of review:

- Initial Review
- Merit Review
- Programmatic Review

NTIA reserves the right at any time during the application review process to negotiate with the applicant relative to specific modifications to the application, including, but not limited to, the resolution of any differences that may exist between the applicant's original request and NTIA's determination of eligible costs and Innovation Fund Program funding priorities. NTIA is under no obligation to fund any application.

7.1.1 Initial Review

NTIA will download applications from the Grants.gov portal and conduct an initial review of applications to determine eligibility, completeness, and responsiveness to the programmatic requirements, including a review of the project narrative and budget justification.

Applications submitted by any entity other than an eligible applicant will be eliminated from further review, as will any applications that fail to meet any of the requirements set forth in ***Section 5*** and any applications outside of the application limits established in ***Section 2.2.1.1.*** NTIA may elect to continue the initial administrative review process for an application that is submitted in a timely manner by an eligible applicant, but that is missing non-material documentation required by this NOFO. The applicant will have up to seven (7) calendar days to submit materials responsive to the feedback provided by NTIA, unless this period is extended by NTIA. An eligible applicant's failure to remedy deficiencies in a timely manner may result in NTIA's denial of the application.

Additionally, NTIA will conduct a high-level technical review of each application to confirm it meets the following minimum requirements:

- The Project Narrative describes an AI-native network fabric.
- The Project Narrative describes an AI-enabled business case.
- The Project Narrative describes how the solution will include security by design.
- The Project Narrative's description of the solution includes a working prototype and field demonstration.

Applications that do not meet these minimum requirements may be removed from consideration and may not move forward in the review process.

7.1.2 Merit Review

Applications that are not removed from consideration during Initial Review will move on to Merit Review. During Merit Review, applications will be evaluated by a panel of at least three (3) independent reviewers composed of government staff or non-federal experts in accordance with the following criteria for a maximum of 100 points. Reviewers may discuss the applications with each other but will assign scores on an individual basis. The reviewers will evaluate applications against the criteria described below.

a) Technical Merit (50 points)

1. **AI-Native Network Fabric:** The applicant clearly and credibly describes how their project will develop an AI-native network fabric that meets the requirements in ***Section 4.2***. (30 points)

2. **Security Plan:** The applicant clearly and credibly describes how their project meets the security requirements in ***Section 4.5***. (20 points)

b) Commercial Viability (35 points)

1. **Business Case:** The applicant presents a viable business case for the solution in accordance with the requirements in ***Section 4.4***. This includes a clear and credible description of how the commercial deployment of the service(s) will help export U.S. AI technology and increase the U.S. share of the wireless communications market. (20 points)

2. **Field Demonstration:** The applicant clearly and credibly demonstrates the commercial viability, including export potential, of one or more service(s) uniquely enabled by the AI-native network fabric in accordance with the requirements in ***Section 4.3***. (15 points)

c) Project Viability (5 points)

1. **Project Narrative:** The applicant's descriptions of their AI-native network fabric, field demonstration, security plan, and business case in ***Section 4*** logically cohere to constitute a project that can credibly produce a technically and commercially viable solution. (5 points)

d) Competence and Budget (10 points)

1. **Competence:** The applicant demonstrates competence (skill, expertise, experience) and organizational capability (personnel and facilities) to complete the specific project proposed and scale a secure solution broadly. If an applicant is partnering with one or more entities, then the partnership(s) will be evaluated in the context of this criterion. In accordance with ***Section***

5.1.1(l), the application must include a Letter of Commitment from each partner, if applicable. (5 points)

2. **Budget:** The applicant demonstrates reasonableness of its proposed budget. (5 points)

NTIA will rank applications based on their mean score (i.e., the average of the individual scores assigned by the independent reviewers). The highest scoring applications that would comprise up to 150% of the available funding will proceed to Programmatic Review.[16] In the event there are applications with the same mean scores that in total would exceed 150% of the available funding, all applications with the same score will be moved to Programmatic Review.

7.1.3 Programmatic Review

NTIA will only perform Programmatic Review of the highest scoring applications coming out of Merit Review (see ***Section 7.1.2***).

Programmatic Review will involve the following process:

NTIA will conduct a detailed review of applications to confirm the Initial Review assessment that all required components were submitted and that the applicant and the participants meet eligibility requirements.

NTIA will also conduct a detailed budget review to verify that the proposed budget, including any cost share, appears allowable, allocable, and reasonable.

Throughout this process, NTIA may request supplemental information. Applicants will have up to seven (7) calendar days to submit supplemental information responsive to the feedback provided by NTIA, unless this time period is extended by NTIA. NTIA program staff will review the supplemental information, along with all information submitted with the application, to confirm eligibility, completeness, and responsiveness to NOFO requirements. Applicants whose supplemental information is not complete, accurate, and submitted in a timely manner or does not adequately substantiate the representations in their applications may not be considered for funding.

Finally, NTIA will conduct a detailed review of applications to verify that all proposed activities align with the objectives of this NOFO, overall Innovation Fund Program goals, and statutory requirements as outlined in the *FY21 NDAA*. Applications determined not to align with these objectives may be deemed non-responsive or non-competitive and may not be recommended for funding.

[16] The percentage may be increased in increments of 25% of original funding available, as needed, if all funding is not allocated after the initial selection process.

Following the completion of the Programmatic Review, NTIA program staff will summarize their analysis for each application reviewed and provide a ranked list of proposed projects to the Innovation Fund Director's consideration.

7.1.4 Selecting Official Approval

The Innovation Fund Director will provide packages of recommended awards to the Selecting Official, the Assistant Secretary of Commerce for Communications and Information and NTIA Administrator. Each package provided by the Innovation Fund Director will include a list of recommended awards, based on each project's merit score. In addition, each list will include recommendations from the Innovation Fund Director to the Selecting Official on application of the selection factors below, where applicable.

The Selecting Official has final determination over whether and how to apply the selection factors. The Selecting Official retains discretion to select and recommend an application for funding that was not recommended by the Innovation Fund Director and/or not to select an application that was recommended for funding by the Innovation Fund Director, based upon the following selection factors:

a) **Availability of Funding.**

b) **Diversity of Project Scope.** To allow for varied approaches and a broader range of projects, the Selecting Official may select lower scoring applications with technologies, exit technical maturities, etc. that differ from other recommended applications.

c) **Alignment with Agency Priorities.** To maximize impact of grant funds and ensure prudent investments which further U.S. interests, NTIA may select projects that align with Agency priorities, based on the AI Action Plan[17] and other Executive Orders that are relevant to AI and/or competitive federal assistance awards.[18] The Selecting Official may pass over applications that the Selecting Official determines do not align with the Agency's priorities, in accordance with the goals and objectives of this NOFO.

d) **Relative Cost Effectiveness.** To maximize impact of grant funds and ensure prudent investments, NTIA may prefer projects that exercise cost reasonableness. The Selecting Official may:

   - Select a lower scoring application that requests less federal funding than a similarly scoped project that requests greater funding;

   - Give additional consideration to applications that contain a higher-than-required cost share.

[17] *Winning the Race* America's AI Action Plan
[18] Promoting the Export of the American AI Technology Stack (Executive Order 14320) and Improving Oversight of Federal Grantmaking (Executive Order 14332)

e) **First-time Innovation Fund Recipient.** The Selecting Official may select a lower scoring application to fund a first-time Innovation Fund recipient.

The Selecting Official retains discretion to select and recommend an application for funding out of rank order based upon one or more of the selection factors listed above. The Selecting Official will submit the applications recommended for funding, along with the basis for the selection decisions, to the National Institute of Standards and Technology (NIST) Grants Officer, who serves as the Grants Officer for the Innovation Fund Program. The final approval of selected applications and issuance of awards will be by the NIST Grants Officer. The award decisions of the NIST Grants Officer are final.

7.1.5 Grants Office Action – Federal Awarding Agency Review of Risk Posed by Applicants

NTIA has contracted with the NIST Financial Assistance Agreements Management Office (FAAMO) to be the servicing grants office for this program. After applications are proposed for funding by the Selecting Official, the NIST FAAMO performs pre-award risk assessments prior to final award, in accordance with 2 C.F.R. § 200.206.

Where the total Federal share is expected to exceed the Simplified Acquisition Threshold (currently $350,000),[19] NIST FAAMO will review and consider the publicly available information about that applicant in SAM.gov under the "Responsibility/Qualification" (R/Q) section, previously known as the Federal Awardee Performance and Integrity Information System (FAPIIS). An applicant may, at its discretion, review and comment on information about itself previously entered into FAPIIS/SAM.gov R/Q by a Federal awarding agency. As part of its review of risk posed by applicants, NIST FAAMO will consider any comments made by the applicant in SAM.gov R/Q in making its determination about the applicant's integrity, business ethics, and record of performance under Federal awards. Upon completion of the pre-award risk assessment, the Grants Officer will make a responsibility determination concerning whether the applicant is qualified to receive the subject award and, if so, whether appropriate specific conditions that correspond to the degree of risk posed by the applicant shall be applied to an award.

The final approval of selected applications and the issuance of awards will be made by the NIST Grants Officer. The award decisions of the NIST Grants Officer are final. All awards are subject to the availability of Federal award funds at the time of award. Unsuccessful applicants will be notified in writing after all selections are finalized. (See ***Section 7.2.1***).

7.2 Federal Award Notices

A grants officer from the NIST FAAMO will serve as the Grants Officer for awards issued pursuant to this NOFO. An applicant will be notified in writing by the NIST Grants Officer if its application is selected for an award. If the application is selected for funding, the NIST

[19] *See* FAR 2.101 (effective March 13, 2026).

Grants Officer will issue the grant award (Notice of Award (NoA)), which is the authorizing financial assistance award document. By signing the NoA, the recipient agrees to comply with all award provisions, terms, and conditions.

If an applicant is awarded funding, neither NTIA nor NIST is under any obligation to provide any additional future funding in connection with that award or to make any future award(s). Amendment of an award to extend the POP is at the discretion of NTIA and the NIST Grants Officer, in accordance with Department of Commerce (DOC) Policy. (See ***Section 2.2.5.1***).

7.2.1 Notification to Unsuccessful Applicants

Unsuccessful applicants will be notified in writing by e-mail and will have the opportunity to receive a debriefing after the final award decisions have been announced. Applicants must make a request within ten (10) business days of the email notification to receive a debrief from NTIA. NTIA will then coordinate with the unsuccessful applicant to arrange a date and time for the debrief.

7.2.2 Retention of Unsuccessful Applications

Unsuccessful applications will be retained in accordance with federal recordkeeping requirements.[20]

[20] National Archives and Records Administration's (NARA) General Records Schedule 1.2: Grant and Cooperative Agreement Records

Section 8 – General Requirements, Restrictions, and Other Information

8.1 Funding Restrictions

8.1.1 Eligible Uses of Funds for the Innovation Fund Program

Grant recipients may only use Federal award funds and any non-federal cost share committed by the recipient to pay for allowable costs under the Innovation Fund Program. Allowable costs are determined in accordance with the Federal cost principles identified in 2 C.F.R. Part 200, Subpart E. In addition, costs must be reasonable, necessary, allocable, and allowable for the proposed project, and must conform to generally accepted accounting principles as defined in 2 C.F.R. Part 200, Subpart E.

8.1.2 Ineligible Costs

Ineligible costs include those costs that are unallowable under the applicable Federal cost principles. If costs do not satisfy the criteria of reasonableness, necessity, allocability, and allowability, they are unallowable. Please note that costs ineligible for this NOFO may not be paid for with the non-federal cost share committed to an award. In addition, the following costs are specifically identified as prohibited:

8.1.2.1 Profit and Fees

A profit, fee, or other incremental charge to the government above actual cost incurred by an award recipient or subrecipient is not an allowable cost for activities funded under this Program.

8.1.2.2 Construction

Construction costs are not allowed under this NOFO.

8.1.2.3 Use of Grant Funds to Support or Oppose Union Organizing

An award recipient or any subrecipient may not use grant funds, whether directly or indirectly, to support or oppose union organizing.

8.1.2.4 Equipment, Supplies, and Services from Untrusted Vendors

Award recipients are prohibited from using grant funds for certain telecommunications and video surveillance services and equipment in accordance with 2 C.F.R. § 200.216. Additionally, ineligible costs include costs from vendors (for example, for equipment, supplies, and services from vendors) found in registries listed in ***Section 2.2.2***.

Award recipients shall be prepared to provide documentation that allows NTIA to verify that its vendors, equipment, or services are not among those prohibited by

Section 8.1.2.4 and Section 2.2.2 of this NOFO or 2 C.F.R. § 200.216 and therefore do not pose an undue risk to promoting a more secure, diverse, sustainable, and competitive wireless technology supply chain.

8.1.2.5 Activities Providing Direct Benefit to the United States Government

In accordance with 31 U.S.C. § 6304, federal grants are generally required to carry out a public purpose of support or stimulation and are not to be used to perform work for the direct benefit of the United States Government. As such, any costs for work where the principal beneficiary is one or more U.S. Government agencies are unallowable (e.g., work to develop a prototype that only meets the requirements of a single U.S. Government agency).

However, costs related to work where the U.S. Government is an indirect beneficiary are allowable. For example, a prototype developed for the commercial market that also may be used by U.S. Government customers. Any determination of the principal beneficiary is at the sole discretion of NTIA.

8.1.2.6 Other

As a condition of receiving a grant under the Innovation Fund Program, an entity that is receiving the grant is prohibited from using grant amounts:

a) As collateral for a loan made by any public or private lender;

b) For pre-application expenses, including previously incurred administrative costs or previously purchased supplies or equipment; and

c) For any other activity listed in this NOFO as ineligible or unallowable.

8.1.3 Fly America Act

Recipients and subrecipients must comply with the *Fly America Act*, which states that all air travel and cargo transportation services funded by the federal government are required to use a "U.S. flag" air carrier service.[21,22] Recipients cannot cross the U.S. border to use a foreign airline to avoid being subject to the *Fly America Act*. If a recipient or subrecipient's travel does not comply with the *Fly America Act,* the federal government will not reimburse the recipient or subrecipient's airline ticket.

8.1.4 Procurement and Operation of Unmanned Aircraft Systems

[21] *See* U.S. General Services Administration, "Fly America Act" and 49 U.S.C. 40118 – Government-financed air transportation.
[22] *See* U.S. Department of Transportation Certificated Air Carriers List.

Procurement and Operation of Unmanned Aircraft Systems (UAS, or drones) under federal assistance is subject to the American Security Drone Act, Pub. L. No. 118-31, §§ 1821-32 (41 U.S.C. § 3901 note) (2023). The Act has two requirements pertinent to grants involving the use of UAS - (1) information security and (2) prohibition of the use of federal funds for the procurement and/or use of a Federal Acquisition Security Council (FASC)-prohibited unmanned aircraft system.

1) For any grant or cooperative agreement involving UAS to process, store, or transmit Federal information, the Department of Commerce and NTIA will implement procedures described in 'Ensuring Government Use of Secure Unmanned Aircraft Systems and Supporting United States Producers,' Office of Management and Budget Memorandum M-26-02 (Nov. 21, 2025). This applies to all UAS, not just FASC-prohibited UAS.

2) The Act prohibits the use of federal funds under any grant or cooperative agreement to procure a FASC-prohibited UAS or in connection with the operation of a FASC-prohibited unmanned aircraft system.

NTIA will review applications in this program and coordinate with applicants on its compliance with the above as applicable to the particular project. To assist NTIA's assessment, applicants may be asked to notify NTIA in their applications if UAS will be used, might be used, or if they do not know if UAS will be used in their projects.

8.2 Administrative and National Policy Requirements

8.2.1 Uniform Administrative Requirements, Cost Principles, and Audit Requirements

Through 2 C.F.R. § 1327.101, the Department of Commerce adopted Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards at 2 C.F.R. Part 200, which apply to awards in this program. Please note that 2 C.F.R. 200 was updated on October 1st, 2024. The updated version of 2 C.F.R. 200 will apply to all awards under this NOFO.

8.2.2 Department of Commerce Financial Assistance General Terms and Conditions

The Department of Commerce will apply the Financial Assistance General Terms and Conditions to each award in this program on the date of award. The current version, dated September 22, 2025, is accessible at [Department of Commerce Financial Assistance General Terms and Conditions.]

8.2.3 Pre-Award Notification Requirements

The Department of Commerce will apply the Pre-Award Notification Requirements for Grants and Cooperative Agreements dated December 30, 2014 accessible at 79 FR 78390.

8.2.4 Property Trust Relationship and Public Notice of Filings for Grant-Acquired Property

In accordance with 2 C.F.R. § 200.316, any real property, equipment, and/or intangible property, acquired or improved with a Federal award must be held in trust by the recipient or subrecipient as trustee for the beneficiaries of the project or program under which the property was acquired or improved. This trust relationship exists throughout the duration of the property's estimated useful life, as determined by the Grants Officer in consultation with the Program Office, during which time the Federal government retains an undivided, equitable reversionary interest in the property (Federal Interest). In this connection, NTIA may require the grantee to record liens or other appropriate notices of record to indicate that personal or real property has been acquired or improved with a Federal award and that use and disposition conditions apply to the property.

Awards issued pursuant to this NOFO may contain specific award conditions pertaining to the use and disposition of grant-acquired property and to a requirement that the recipient or subrecipient file certain public notices (e.g., UCC-1, Covenant of Purpose, Use and Ownership, etc.) with respect to grant-acquired property. NTIA may provide information regarding the useful life schedules associated with assets acquired with grant funds.

8.2.5 Reporting

The Department of Commerce understands the importance of undertaking systematic data collection and other rigorous evaluative activities to assess the outcomes related to funds awarded under this NOFO. NTIA and the NIST Grants Office are committed to this goal, and all applicants should expect this will be a requirement of all awards. This data will be instrumental in understanding the effects of individual funded projects and will enable NTIA to assess the extent to which the program's strategic objectives have been achieved.

All award recipients will be expected to comply with any reporting requirements, as well as any program evaluation activities. More detail regarding reporting requirements will be included in the terms and conditions.

The following is a list of standard documents that will enable NTIA and NIST Grants Office to collect information about program activities that grantees should expect to prepare:

a) Baseline/Expenditure Plan

Within forty-five (45) calendar days of the award date, the grantee shall submit to the NIST Grants Office a Baseline Report for the entire performance period that will include planned activities and major milestones and spending by quarter for the period of performance.

b) Federal Financial Report

Grantees must report on obligations and expenditures using the Federal Financial Report (Standard Form 425) semi-annually. The report is submitted to the NIST Grants Office and is due 30 calendar days following the end of quarters ending in March and September. A report must be submitted for each calendar quarter that the grant is active, including partial calendar quarters or when no financial activity occurs.

c) Semiannual Performance Progress Reporting

All grantees must submit Performance Progress Reports (PPR) on a semiannual basis. PPRs must contain the following information:

a. A comparison of actual accomplishments during the reporting period with the goals and dates established in the Baseline/Expenditure Plan for the reporting period;
b. A description of any problems that have arisen or the reasons why established goals have not been met;
c. Actions taken to remedy any failures to meet goals; and
d. A description of risks that may prevent the grantee from achieving goals in future reporting periods.

Reports must be submitted to the NIST Grants Office and are due 30 calendar days following the end of quarters ending in March and September. A report must be submitted for every reporting period that the grant is active, including partial calendar quarters or when no activity occurs.

d) Final Report and Closeout Reporting

In addition to the above requirements and those reporting requirements found in 2 C.F.R. Part 200, any entity that receives an award will be required to submit a final report as a part of the grant close-out process that describes the programmatic objectives achieved through the funding and completion of the grant-funded project, including those elements collected in the semiannual PPR. Additionally, both a final financial report and a final technical progress report are due within 120 days after the end of the project period.

8.2.6 Recipient Integrity and Performance Matters

In accordance with 41 U.S.C. § 2313, if the total value of a recipient's currently active grants, cooperative agreements, and procurement contracts from all Federal awarding agencies exceeds $10,000,000 for any period of time during the POP of an award made under this NOFO, then the recipient shall be subject to the requirements specified in Appendix XII to 2 C.F.R. Part 200, for maintaining the currency of information reported to SAM that is made available in the Federal Awardee Performance and Integrity Information System (FAPIIS) about certain civil, criminal, or administrative proceedings involving the recipient.

8.2.7 Audit Requirements

The grant regulations in 2 C.F.R. Part 200, Subpart F, adopted by the Department of Commerce through 2 C.F.R. § 1327.101, require any non-federal entity that expends Federal awards of $1,000,000 or more in the recipient's fiscal year to conduct a single or program-specific audit in accordance with the requirements set out in the Subpart.

Additionally, unless otherwise specified in the terms and conditions of the award, entities that are not subject to Subpart F of 2 C.F.R. Part 200 (e.g., commercial entities) that expend $1,000,000 or more in grant funds during their fiscal year must submit to the Grants Officer either:

a) A financial audit of each DOC award or subaward in accordance with Generally Accepted Government Auditing Standards;[23] or

b) A project specific audit for each award or subaward in accordance with the requirements contained in 2 C.F.R. § 200.507.

Applicants are reminded that NTIA, the Department of Commerce Office of Inspector General, or another authorized Federal agency may conduct an audit of an award at any time.

8.2.8 Federal Funding Accountability and Transparency Act of 2006

In accordance with 2 C.F.R. Part 170, all recipients of a federal award made on or after October 1, 2010, are required to comply with reporting requirements under the Federal Funding Accountability and Transparency Act of 2006 (Pub. L. No. 109-282). In general, all recipients are responsible for reporting sub-awards of $30,000 or more. In addition, recipients that meet certain criteria are responsible for reporting executive compensation. Applicants must ensure they have the necessary processes and systems in place to comply with the reporting requirements should they receive funding.

8.2.9 Protected and Proprietary Information

The applicant acknowledges and understands that information and data contained in applications for financial assistance, as well as information and data contained in financial, performance, due diligence, and other reports submitted by the applicant (together, "applicant information and data"), may be used by the Department of Commerce in conducting reviews and evaluations of its financial assistance programs and

[23] *See* U.S. Government Accountability Office, GAO-21-368G, *Government Auditing Standards* (April, 2021).

for statistical purposes. Applicant information and data may also be used for the purposes of this NOFO and carrying out the government's responsibilities in connection with the Innovation Fund, or as otherwise required by law. For these purposes, applicant information and data may be accessed, reviewed, and evaluated by Department of Commerce employees, other federal employees, federal agents and contractors, and/or by non-federal personnel, all of whom enter into appropriate confidentiality and nondisclosure agreements covering the use of such information. As may be provided in the terms and conditions of a specific financial assistance award, applicants are expected to support program reviews and evaluations by submitting required financial and performance information and data in an accurate and timely manner, and by cooperation with the Department of Commerce and external program evaluators. In accordance with 2 C.F.R. § 200.303(e), applicants are reminded that they must take reasonable measures to safeguard protected personally identifiable information and other confidential or sensitive personal or business information created or obtained in connection with a Department of Commerce financial assistance award. By submitting applicant information and data, the applicant, potential applicant, or an entity submitting the information consents to the disclosure of such applicant information and data to consultants and contractors for these purposes, consistent with federal law.

NTIA will protect confidential and proprietary information from public disclosure consistent with applicable law, including the Trade Secrets Act, as amended (18 U.S.C. § 1905) and the Economic Espionage Act of 1996 (18 U.S.C. § 1831 et seq.). In the event that a submission contains information or data deemed to be confidential commercial information or that otherwise shall not be publicly disclosed, that information shall be identified, bracketed, and marked as Privileged, Confidential, Commercial or Financial Information. Based on these markings, the confidentiality of the contents of those pages will be reviewed for protection consistent with applicable law.

8.2.10 Intellectual Property Rights, Royalties, And Restrictions

In accordance with the Bayh-Dole Act (35 U.S.C. § 200 et. seq.), 37 C.F.R. § 401, and 2 C.F.R § 200.315, recipients of federal grant funds can retain rights to any intellectual property developed during the grant. NTIA encourages Innovation Fund grantees to leverage this ability to the maximum extent practical.

Costs relating to royalties for patents and copyrights necessary for the performance of the federal award[24] and costs related to counsel for patent and copyright matters[25] are allowable costs as long as they meet requirements of the applicable provisions related to the allocation of costs under federal awards (see ***Section 8.1***). However, grantees under this award are not authorized to use federal funds for royalty costs paid to ineligible entities listed in ***Section 2.2.2***.

[24] *See* 2 C.F.R. § 200.448(b).
[25] *See* 2 C.F.R. § 200.448(a)(1)(iii).

NTIA recognizes that voluntary consensus standards are important to economic growth and furtherance of the Innovation Fund objectives.[26] As such, costs related to participation in relevant standards activities to further the objectives of this NOFO are allowable.

Additionally, informational sharing, licensing, or other knowledge transfer of intellectual property developed under this grant to an ineligible entity is prohibited, except when required for a standards-related activity, as defined in 15 C.F.R § 772.1 (e.g., as a standards-essential patent).[27] This does not apply to publicly published open-source intellectual property.

8.2.11 Funding Availability and Limitation of Liability

Funding for the program listed in this NOFO is contingent upon the continued availability of appropriations. In no event will NTIA, NIST, or the Department of Commerce be responsible for application preparation costs, including, but not limited to, if the program is amended or cancelled by governing law. Publication of this NOFO does not oblige NTIA, NIST or the Department of Commerce to award any specific project or to obligate any available funds. NTIA will fund only projects that are deemed likely to achieve the Innovation Fund Program's goals and for which funds are available.

8.2.12 Third Party Beneficiaries

The Innovation Fund Program is not intended to and does not create any rights enforceable by third party beneficiaries.

8.2.13 Environmental and Historic Preservation

NTIA-funded awards must comply with Environmental and Historic Preservation (EHP) laws, including the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA).[28] Application submittals shall identify projects that may impact sensitive environmental and historic resources and describe how the applicant will comply with EHP and NEPA requirements.

It is the applicant's and subgrantee's responsibility to obtain all federal, state, local, and Tribal permits, authorizations, and approvals necessary to conduct the proposed work. All NTIA-funded activities should be designed to minimize the potential for adverse impacts on the environment. Applicants proposing projects and other eligible activities with potentially adverse environmental impacts will be required to assist NTIA in identifying and implementing measures to avoid, minimize, or mitigate such impacts.

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[26] *See* 47 U.S.C. § 906(a)(1)(C). Standards activities are particularly conducive to advancing objectives (ii) and (iii).
[27] *See* 15 C.F.R § 772.1.
[28] *See* National Environmental Policy Act (NEPA) (42 U.S.C. 4321 et seq.) and the National Historic Preservation Act (NHPA) (54 U.S.C. 300101 et seq.).

NTIA will review applications to ensure that they contain sufficient information to: support a preliminary NEPA analysis; to identify what (if any) further NEPA-related review and documentation will need to be submitted to NTIA; and to recommend funding for the selected projects or other eligible activities. Relevant project information that would assist NTIA in making a preliminary determination of the level of NEPA analysis required includes a detailed description of all proposed project activities, locations of proposed equipment installations or building renovations, and maps and photographs of proposed installation and renovation locations.

NTIA can withhold funds under a special award condition if additional analyses or information are necessary for the agency to assess the environmental impacts of a potential award.

8.2.14 Research Activities Involving Human Subjects, Data, or Recordings Involving Human Subjects, Including Software Testing

Any application that includes research activities involving human subjects or data or recordings from or about human subjects must satisfy the requirements of the Common Rule for the Protection of Human Subjects ("Common Rule"), codified for the Department of Commerce at 15 C.F.R. Part 27.[29] Research activities involving human subjects that fall within one or more of the classes of vulnerable subjects found in 45 C.F.R. Part 46, Subparts B, C and D must satisfy the requirements of the applicable subpart(s). In addition, any such application that includes research activities on these subjects must comply with all applicable statutory requirements imposed upon the Department of Health and Human Services (DHHS) and other federal agencies, all regulations, policies and guidance adopted by DHHS, the Food and Drug Administration (FDA), and other federal agencies on these topics, and all Executive Orders and Presidential statements of policy on applicable topics. The website of the Office of Human Research Protection (OHRP) in the DHHS contains the applicable regulatory, policy and guidance and (includes links to FDA, but may not include all applicable FDA regulations and policies).

While unlikely that the kinds of research envisioned in this NOFO will trigger the Human Subject Common Rule, all grantees conducting research must consider the types of activities to be conducted and will be required to affirmatively certify, by separable task, all research activities believed to be exempt or non-exempt research involving human subjects, and if non-exempt, the expected institution(s) where the research activities involving human subjects may be conducted, and the institution(s) expected to be engaged in the research activities. This certification must be submitted to the Federal Program Officer within 30 days of award.[30]

8.2.15 Gold Standard of Science

[29] NTIA uses the Common Rule definitions for research and human subjects research contained in .
[30] *See* NIST, NIST Notice of Funding Opportunity Requirements Human Subjects and Live Vertebrate Animal.

In performing activities under Federal awards, applicants should commit to complying with administration policies, procedures, and guidance respecting Gold Standard Science. As detailed in Executive Order 14303, Restoring Gold Standard Science (May 23, 2025), Gold Standard Science refers to science conducted in a manner that is:

- Reproducible.
- Transparent.
- Communicative of error and uncertainty.
- Collaborative and interdisciplinary.
- Skeptical of its findings and assumptions.
- Structured for falsifiability of hypotheses.
- Subject to unbiased peer review.
- Accepting of negative results as positive outcomes.
- Without conflicts of interest.

8.2.16 Paperwork Reduction Act

This NOFO contains an information collection requirement subject to the Paperwork Reduction Act (PRA) (44 U.S.C. § 3501 et seq.).[31] The PRA requires each federal agency to seek and obtain OMB approval before collecting information from the public. Federal agencies may not collect information unless it displays a currently valid OMB control number. For purposes of the Innovation Fund Program, NTIA will use Standard Forms 424 (Application for Federal Assistance), 424A (Budget Information for Non-Construction Programs), 424C (Budget Information for Construction Programs), Budget Narrative and Justification, Project/Performance Site Location(s), 425 (Federal Financial Report), 328 (Certificate Pertaining to Foreign Interests), and LLL (Disclosure for Lobbying Activities) under the respective control numbers 4040-0004, 4040-0006, 4040-0008, 0690-0039, 4040-0010, 4040-0014, 0704-0579, and 4040-0013.

8.2.17 Prohibition on Using Federal Awards to Promote or Support Theories of Disparate Impact Liability

In accordance with Executive Order 14281, Restoring Equality of Opportunity and Meritocracy (April 23, 2025), it is the policy of the Federal Government to eliminate the use of disparate-impact liability in all contexts to the maximum extent possible and permitted by law.

8.2.18 Executive Order 14173: Ending Illegal Discrimination and Restoring Merit-Based Opportunity

This award term implements Executive Order 14173, 90 FR 8633 (Jan. 21, 2025). By accepting a U.S. Department of Commerce (DOC) financial assistance Award or Award Amendment (as the case may be) and expending federal funding thereunder, the recipient:

[31] *See* 44 U.S.C. § 3501 et seq.

- Agrees that compliance in all respects with all applicable Federal anti-discrimination laws is material to the government's payment decisions for purposes of section 3729(b)(4) of Title 31 United States Code;

- Certifies to the Department that it does not operate any programs promoting diversity, equity, and inclusion that violate any applicable Federal anti-discrimination laws; and

- Further certifies to the Department that it does not participate in any illegal preferences, mandates, policies, programs, activities, guidance, regulations, enforcement actions, consent orders, and requirements.

Affirmative Duty to Monitor for and to Report Potential Inconsistencies

The recipient must actively monitor its administration of an award to ensure that its activities do not violate the requirements of the award, including the SAC. At any time during the period of performance of the award, if the recipient believes that any of the activities in its approved scope of work may be inconsistent with the policies as outlined above, the recipient has an affirmative duty to immediately stop work on those potentially inconsistent activities and immediately contact the Grants Officer named in the Notice of Award (NoA) to determine whether the potentially inconsistent activities may proceed under the award. The performance of activities that violate or are otherwise inconsistent with requirements as outlined above will result in appropriate enforcement action pursuant to 2 C.F.R. § 200.339, including the disallowance of costs and possible termination of a portion or all of the award.

8.2.19 Transparency, Accountability, and Oversight Required

NTIA, recipients, and subrecipients have a critical role to play in ensuring that the Innovation Fund Program is implemented in a manner that ensures transparency, accountability, and oversight sufficient to, among other things:

a) Minimize the opportunity for waste, fraud, and abuse;

b) Ensure that recipients of Innovation Fund grants use grant funds to further the overall purpose of the Program in compliance with the requirements of this NOFO, 2 C.F.R. Part 200, and other applicable law; and

c) Allow the public to understand and monitor grants and subgrants awarded under the program.

To that end, NTIA shall:

a) Conduct such monitoring activities as are necessary and appropriate;

b) Develop monitoring plans, subject to the approval of the Assistant Secretary or their designee, that may include site visits or desk reviews, technical assistance, and random sampling of compliance requirements; and

c) Impose specific conditions on grant awards designed to mitigate the risk of nonperformance where appropriate.

Each award recipient shall:

a) Comply with the reporting requirements set forth in ***Section 8.2.5.***;

b) Ensure oversight of first-tier subrecipients and vendors/contractors; and

c) Comply with the obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce's Financial Assistance General Terms and Conditions.

NTIA may also recommend to the NIST Grants Office enforcement action related to applicable rules and laws. The NIST Grants Office may impose penalties for failure to meet statutory obligations, or wasteful, fraudulent, or abusive expenditure of grant funds. Such penalties include, but are not limited to, imposition of additional award conditions, payment suspension, award suspension, grant termination, de-obligation/clawback of funds, and debarment of organizations and/or personnel.

8.2.20 U.S. Department of Commerce, Office of Inspector General

The U.S. Department of Commerce Office of Inspector General (OIG) seeks to improve the efficiency and effectiveness of the Department's programs, including deterring and detecting fraud, waste, abuse, and mismanagement. The OIG accomplishes this mission primarily through investigations, audits, and inspections of Department activities, including grants, cooperative agreements, loans, and contracts.

8.2.20.1 Disclosures

Recipients of financial assistance originating from the Department of Commerce, which includes NTIA and NIST, shall timely disclose, in writing, to the OIG and awarding agency, whenever, in connection with the award, performance, or closeout of this grant or sub-award thereunder, the recipient has credible evidence that a principal, employee, agent, or sub-recipient has committed:

a) A violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code; or

b) A violation of the civil False Claims Act (31 U.S.C. §§ 3729-3733).

8.2.20.2 Reporting

The OIG maintains a hotline to receive allegations of fraud, waste, or abuse. To report such allegations, please visit https://www.oig.doc.gov/Pages/Hotline.aspx. Upon request, the OIG will take appropriate measures to protect the identity of any individual who reports misconduct, as authorized by the Inspector General Act of 1978, as amended. Reports to the OIG may also be made anonymously.

8.2.21 Waiver Authority

It is the general intent of NTIA not to waive any of the provisions set forth in this NOFO. However, under extraordinary circumstances and when it is in the best interest of the federal government, the Assistant Secretary or their designee, upon their own initiative or when requested, may waive any provision in this NOFO. Waivers may only be granted for requirements that are discretionary and not mandated by statute or other applicable law. Any request for a waiver must set forth the extraordinary circumstances for the request.

8.2.22 Whistleblower Protection

Recipients, sub-recipients, and employees working on this grant award will be subject to the whistleblower rights and remedies established under 41 U.S.C. § 4712.[32] An employee of a recipient or sub-recipient may not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing information that the employee reasonably believes is evidence of: gross mismanagement of a federal contract or award; a gross waste of federal funds; an abuse of authority (i.e., an arbitrary and capricious exercise of authority that is inconsistent with the mission of NTIA or the Department of Commerce or the successful performance of a contract or grant awarded by NTIA or the Department) relating to a federal contract or award; a substantial and specific danger to public health or safety; or a violation of a law, rule, or regulation related to a federal contract (including the competition for or negotiation of a contract) or grant. The recipient or sub-recipient shall inform its employees and contractors, in writing, in the predominant language of the workforce or organization, of employee whistleblower rights and protections under 41 U.S.C. § 4712,[33] as described above and in the OIG's Whistleblower Protection Program.[34]

8.2.23 Enforcement

NTIA shall take enforcement action against recipients as necessary and appropriate. A recipient (or applicable subrecipient) that fails to comply with any requirement under the *FY21 NDAA* or this NOFO shall be required to return up to the entire amount of the award at the discretion of the Assistant Secretary (or, in the case of a subrecipient, the Assistant Secretary or the recipient).

[32] *See* 41 U.S.C. § 4712.
[33] *Id.*
[34] *See* OIG Whistleblower Protection Program

8.2.24 Unauthorized Use of Funds

To the extent that the Assistant Secretary or the Inspector General of the Commerce Department determines that an Innovation Fund Program recipient or subrecipient has expended grant funds received under the Innovation Fund Program in violation of the requirements set forth in 47 U.S.C. § 906[35] and 2 C.F.R. Part 200,[36] the terms and conditions of the award, or other applicable law, the Assistant Secretary shall, if appropriate, recover the amount of funds that were so expended.

8.2.25 Termination

In accordance with 2 CFR § 200.340(a), a federal award may be terminated in part or in its entirety as follows:

a) By DOC or the pass-through entity if the recipient or subrecipient fails to comply with the terms and conditions of the federal award.

b) By DOC or the pass-through entity with the consent of the recipient or subrecipient, in which case the two parties must agree upon the termination conditions. These conditions include the effective date and, in the case of partial termination, the portion to be terminated.

c) By the recipient or subrecipient upon sending DOC or the pass-through entity a written notification of the reasons for termination, the effective date, and, in the case of partial termination, the portion to be terminated. If DOC or the pass-through entity determines that the remaining portion of the federal award will not accomplish the purposes for which the federal award was made, DOC or the pass-through entity may terminate the federal award in its entirety.

d) By DOC or the pass-through entity, pursuant to the terms and conditions of the Federal award, including, to the extent authorized by law, if the award no longer effectuates the program goals or agency priorities.

8.2.26 Federal Awarding Agency Contact(s)

Questions should be directed to:

Subject Area	Point of Contact
Programmatic and Technical Questions	Lynn Bagorazzi Grants Lead, Innovation Fund InnovationFund@ntia.gov
Technical Assistance with Submission	Grants.gov Help Desk 1-800-518-4726 support@grants.gov

[35] *See* 47 U.S.C. § 906.
[36] *See* 2 C.F.R. Part 200.

Grants Rules and Regulations	Shanell Williams Grants Office Team Lead shanell.williams@nist.gov
Media Inquiries	Stephen Yusko NTIA Director of Public Affairs (Acting) press@ntia.gov

Appendix A – Glossary of Terms

5G New Radio (NR) – The term "5G New Radio (NR)" means specifications developed by the 3rd Generation Partnership Project (3GPP) for 5G technology. For the purposes of this NOFO, this is 3GPP Release 16 and later 5G NR specifications.

AI-Native Network Fabric – The term "AI-native network fabric" means a network infrastructure that is conceived, designed, and built with artificial intelligence in its foundation, rather than as a feature added after deployment.

Applicant – The term "applicant" means the lead entity, i.e., the organization submitting the application package on Grants.gov using a unique SAM registration.

Assistant Secretary – The term "Assistant Secretary" means the Assistant Secretary of Commerce for Communications and Information and NTIA Administrator, or the individual who holds any equivalent or successor position. The terms "Assistant Secretary" and "NTIA Administrator" refer to the same position.

Compute Environment – The term "compute environment" means hardware and software resources that allows multiple users or applications to operate, develop, or execute computation tasks in a consistent manner.

Contractor – The term "contractor" means an entity that receives a contract. A contract is for the purpose of obtaining goods and services for the recipient's or subrecipient's use and creates a procurement relationship with a contractor.

Construction – The term "construction" means construction, rehabilitation, alteration, conversion, extension, repair, or improvement of buildings, highways, or other real property. For the purposes of this NOFO, construction is prohibited (See ***Section 8.1.2.2***)

Cost Share – The term "cost share" means the non-federal portion of a project budget, also known as "match".

Country of Concern – The term "country of concern" as defined in Sec. 8521 of the 2026 National Defense Authorization Act (Pub. L. 119-60) means the People's Republic of China, including the Hong Kong and Macau Special Administrative Regions; the Republic of Cuba; the Islamic Republic of Iran; the Democratic People's Republic of Korea; the Russian Federation; and the Bolivarian Republic of Venezuela under the regime of Nicolas Maduro Moros.

Covered Nation – The term "covered nation" as defined in 10 U.S.C. § 4872(d)(2)[37] means the Democratic People's Republic of North Korea, the People's Republic of China, the Russian Federation, and the Islamic Republic of Iran.

[37] *See* 10 U.S.C. § 4872(d)(2).

Foreign Entity of Concern – The term "foreign entity of concern" is defined in 15 U.S.C. §4651(8)[38] and 15 C.F.R. § 231.104,[39] subject to any further rulemaking promulgated by the Department of Commerce.

NIST Grants Office – The term "NIST Grants Office" means the National Institute for Standards and Technology Grants Office, which serves as the official certified Grants Officer for the Innovation Fund.

NTIA – The term "NTIA" means the United States Department of Commerce, National Telecommunications and Information Administration.

NTIA Administrator – The term "NTIA Administrator" means the Assistant Secretary of Commerce for Communications and Information and NTIA Administrator, or the individual who holds any equivalent or successor position. The terms "Assistant Secretary" and "NTIA Administrator" refer to the same position.

Open Radio Access Network (Open RAN) – The term "open radio access network", or "Open RAN", means an approach to radio access network design that leverages open, interoperable, and standards-based RAN elements to form a virtualized and disaggregated RAN.

Participant – The term "participant" means any funded or unfunded entity (including subrecipients, contractors, and partners) other than the applicant that participates in grant-funded activities.

Partner – The term "partner" means an entity with which the applicant has or plans to have a formal partnership relationship through a Memorandum of Understanding, Letter of Partnership Intent, or other mechanism. A partner can be funded (i.e., a subrecipient) or unfunded.

Prototype – The term "prototype" means a hardware or software solution that can be piloted, is developed as a part of a target product, and may evolve into an operational product. Prototypes that have been successfully validated through a pilot must be ready for deployment in an operational commercial system for testing.

Radio Access Network (RAN) – The term "radio access network", or "RAN", means the network of elements providing over-the-air radio access to devices in mobile networks. In 5G New Radio (NR) networks, this includes the Radio Unit (RU), Central Unit (CU), and Distributed Unit (DU).

Radio Unit (RU) – The term "Radio Unit", or "RU", means the physical element of a radio access network that provides over-the-air radio access to a 5G system.

Recipient –The term "recipient" means an entity that receives a Federal award directly from a Federal agency to carry out an activity under a Federal program. The term "recipient" does not include subrecipients or individuals that are participants or beneficiaries of the award.

[38] *See* 15 U.S.C. §4651(8).
[39] *See* 15 C.F.R. § 231.104.

Selecting Official – The term "Selecting Official" means a senior program official of the operating unit authorized to make selection recommendations to the Grants Officer for final approval of selected award applications.

Subrecipient –The term "subrecipient" means an entity that receives a subaward from a pass-through entity to carry out part of a Federal award. The term "subrecipient" does not include a beneficiary or participant. A subrecipient may also be a recipient of other Federal awards directly from a Federal agency.

Vulnerability Scans – The term "vulnerability scans" means an automated process that determines whether software/equipment contain any pre-defined vulnerabilities, including but not limited to insecure protocols, known vulnerable software libraries, and use of common or default authentication credentials.