



Broadband NavigatorTM User GuideVersion 4

Arizona Commerce Authority April 2024

Version Tracking

Updates in Version 4

- 1. Types of Challenges pg. 4
- 2. Updated Images pg. 6, 8, 9, 11, 13, 14, 16, 19
- 3. Address searching pg. 8
- 4. Additional file types allowed and file size limitations updated pg. 10,15,16,20
- 5. Account Registration pg. 10
- 6. Manage Users pg. 10
- 7. Submitting Challenges by BSL pg. 13
- 8. Bulk Challenges pg. 16
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Broadband Navigator™ User Guide

Welcome to the Broadband Navigator™ User Guide. This guide is designed to help you understand and use the application for managing the BEAD State Challenge process.

Overview

According to the National Telecommunications and Information Administration's (NTIA) Broadband, Equity, Access, and Deployment (BEAD) Program Guidance, each State Broadband Office needs to implement a State Challenge Process Portal as part of their BEAD Program. The goal of the State Challenge Process is to improve the broadband data coverage (BDC) map in each state, so that State Broadband offices have the most accurate map possible to use to make funding disbursement decisions. The Broadband Navigator will provide the tools and capabilities to allow Local and Tribal Governments, Internet Service Providers (ISPs), and Nonprofits to view and challenge the broadband coverage determinations (served, underserved, unserved) for each broadband serviceable location (BSL).

To manage these challenges according to the <u>NTIA's BEAD process policy guidelines</u>, AppGeo provides the Broadband Navigator[™] Portal. The Portal is a solution that will meet NTIA's requirements while also allowing states the flexibility to implement the tool in a way that aligns with their particular priorities and goals, according to their Five-Year Plans and Initial Proposals.

Using the Navigator, Broadband Offices can manage the complete lifecycle of a BEAD challenge through inception, review of evidence, rebuttal, adjudication, and final determination.

Who Can Submit Evidence?

Anyone using the Broadband Navigator is welcome to submit evidence on issues with Availability, Speed, Latency, Technology, Data Cap and Business Service Only. If you are a member of the public who would like to submit evidence, see the Public Evidence Submission section below.

Who Can Create Challenges?

Only the following entities are eligible to submit challenges to the State under the BEAD Program federal policy:

- 1. Units of Local or Tribal Governments
- 2. Nonprofit Organizations
- 3. Internet Service Providers (ISPs)

Types of Challenges

Code	Challenge Type	Description	Challenge Evidence	Permissible Rebuttals
А	Service Is or locations on the map has had subscribers in the last 12 months or service is available as a standard installation based on	Screenshot of provider webpage. A service request was refused within the last 180 calendar days (e.g., an e- mail or letter from service provider).	Service provider shows that the location subscribes or has subscribed within the last 12 months, e.g., with a copy of a customer bill.	
		existing infrastructure.	Lack of suitable infrastructure (e.g., no fiber on pole). A letter or e-mail dated within the last 365 calendar days that a provider failed to schedule a service installation or offer an installation date within 10 business days of a request. A letter or e-mail dated within the last 365 calendar days indicating that a service provider requested more than the standard installation fee to connect this location or that a service provider quoted an amount in excess of the provider's standard installation charge in order to connect service at the location.	If the evidence was a screenshot and believed to be in error, a screenshot that shows service availability. The service provider submits evidence that service is now available as a standard installation, e.g., via a copy of an offer sent to the location.
A	Availability – Service Is Not Available (Inverse Availability)	Individuals, Nonprofits, Local or Tribal Governments, and ISPs are stating that the service displayed on the map is not offered on the ground.	A copy of customer bill that shows the location subscribed to the providers service (365 days). A screenshot from the provider website that shows service availability at that location (365 days). A copy of an offer sent to the location that provides service is now available as a standard installation (365 days). Geospatial, as-built diagrams or files of infrastructure deployed to provide service to the location (365 days).	Availability (Service Is Not Available) Challenges may be rebutted with evidence of the same type that is acceptable for submission as evidence to support an Availability Challenge.

Code	Challenge Type	Description	Challenge Evidence	Permissible Rebuttals
S	Speed	Individuals are taking speed tests to show that their subscribed service tier is not served at the speed indicated on the map. Additionally, they are testing to ensure the latency of this BSL is <100mbps.	Speed test by subscriber, showing the insufficient speed and meeting the requirements for speed tests.	Service provider has countervailing speed test evidence showing sufficient speed, e.g., from their own network management system.
L	Latency	Individuals, Nonprofits, Local or Tribal Governments, and ISPs are stating that there is a data cap of 600GB or less imposed on this BSL's service tier.	Speed test by subscriber, showing the excessive latency.	Service provider has countervailing speed test evidence showing latency at or below 100 ms, e.g., from their own network management system or the CAF performance Measurements.
D	Data Cap	Individuals, Nonprofits, Local or Tribal Governments, and ISPs are stating that the technology indicated for this service tier is incorrect.	Screenshot of provider webpage. Service description provided to consumer.	Service provider has terms of service showing that it does not impose an unreasonable data cap or offers another plan at the location without an unreasonable cap.
Т	Technology	Individuals, Nonprofits, Local or Tribal Governments, and ISPs are stating that a particular service level at a residential location is only available to businesses.	Manufacturer and model number of residential gateway (CPE) that demonstrates the service is delivered via a specific technology.	Service provider has countervailing evidence from their network management system showing an appropriate residential gateway that matches the provided service.
В	Business service only	Nonprofits, Local or Tribal Governments, and ISPs are stating that there is an enforceable funding commitment to deploy broadband at this location by the date stated in the deployment obligation.	Screenshot of provider webpage.	Service provider documentation that the service listed in the BDC is available at the location and is marketed to consumers.

Code	Challenge Type	Description	Challenge Evidence	Permissible Rebuttals
E	Enforceable Commitment	ISPs, Broadband Offices, Nonprofits, and Local or Tribal Governments state that the location is in an area subject to an enforceable commitment, but it is not part of that commitment.	Enforceable commitment by service provider (e.g., authorization letter). In the case of Tribal Lands, the challenger must submit the requisite legally binding agreement between the relevant Tribal Government and the service provider for the location(s) at issue.	Documentation that the provider has defaulted on the commitment or is otherwise unable to meet the commitment (e.g., is no longer a going concern).
P	Planned Service	ISPs, Broadband Offices, Nonprofits, and Local or Tribal Governments are stating that there are plans for service at this BSL.	Construction contracts or similar evidence of on- going deployment, along with evidence that all necessary permits have been applied for or obtained. Contracts or a similar binding agreement between the Eligible Entity and the service provider committing that planned service will meet the BEAD definition and requirements of reliable and qualifying broadband even if not required by its funding source (i.e., a separate federal grant program), including the expected date deployment will be completed, which must be on or before June 30, 2024.	Documentation showing that the service provider is no longer able to meet the commitment (e.g., is no longer a going concern) or that the planned deployment does not meet the required technology or performance requirements.
N	Not part of enforceable commitment	Individuals, ISPs, Broadband Offices, Nonprofits, and Local or Tribal Governments are stating that the location falls within the definition of a CAI as defined by the eligible entity.	Declaration by service provider subject to the enforceable commitment.	
С	Location is a CAI	Individuals, ISPs, Broadband Offices, Nonprofits, and Local or Tribal Governments are stating that the location does not fall within the definition of a CAI as defined by the eligible entity.	Evidence that the location falls within the definitions of CAIs set by the Eligible Entity. 17	Evidence that the location does not fall within the definitions of CAIs set by the Eligible Entity or is no longer in operation.
R	Location is not a CAI	Individuals are taking speed tests to show that their subscribed service tier is not served at the speed indicated on the map. Additionally, they are testing to ensure the latency of this BSL is <100mbps.	fall within the definitions of CAIs set by the Eligible Entity or is no longer	Evidence that the location falls within the definitions of CAIs set by the Eligible Entity or is still operational.

Challenge Process Phases Overview

Publication of Eligible Locations

Prior to the Challenge Phase kickoff, the Broadband Office will publish the final set of locations eligible for BEAD funding. This dataset will consist of 'unserved' and 'underserved' locations outside of existing federal or state funded areas. This data is sourced from the FCC's National Broadband Map and NTIA's National Broadband Availability Map (NBAM). Additionally, the office will publish locations that are served, including funded areas, as they may also be challenged.

Challengers are encouraged to use this time to register on the portal, review the classification of BSLs, identify the ones they plan to challenge, and gather the necessary evidence to submit a challenge.

Challenge Phase

During this phase, eligible entities may submit challenges through the challenge portal. Challenges must include evidentiary support of each challenge based on the evidence documentation provided in the state's BEAD Initial Proposal Volume I.

Once evidence is submitted, the challenge will appear in the Navigator evidence review dashboard. Each challenge has its own activity log, which enables the Broadband Office to audit any challenge. From the dashboard, the Broadband Office or their designees can examine the provided evidence and accept or reject it based on the guidelines of the BEAD Challenge Process. If the challenge meets the requirements, it will be updated in the portal as 'Challenged' and be visible to the provider whose service availability and performance is being contested.

The portal will also notify the provider of the challenge through an automated email. The email will contain important timing information on the specific challenge, alerting the rebutters or challenge reviewers of the deadlines associated with each challenge.

<u>Deadlines are a critical element of the BEAD Process</u>: It is recommended to submit challenges early. If any errors exist, there will be an opportunity to re-submit, but only within the Challenge Phase window. No changes will be accepted after the 60-day Challenge Phase window.

Rebuttal Phase

Rebuttals will occur on a rolling basis, with each challenge having a limited length of time to be rebutted. This length of time is specified in the BEAD Initial Proposal Volume I and begins at the time of challenge evidence approval. At the end of the Challenge Phase, an official Rebuttal Phase will begin. This phase serves as a buffer and ensures all challenges submitted at the end of the Challenge Phase have ample time to be rebutted.

Service Level Challenge Rebuttals

Challenges related to availability (availability, speed/latency, data cap, technology, planned service, and business service only) will be posted in the dashboard of the associated ISP. The ISP will also be notified by email as each challenge is moved to the Rebuttal Phase. Challenges may only be rebutted by the challenged service provider. The challenged service provider may rebut

the reclassification of a location or area with sufficient evidence outlined in the state's BEAD Initial Proposal Volume I. If rebutted, the challenge location or locations will be put into the 'disputed' state. If a challenge is not rebutted within the rebuttal period, the challenge will be accepted and enter the 'sustained' state.

All Other Challenges - Open Rebuttals

All other challenge types (planned service, enforceable commitment, location is a CAI, and location is not a CAI) may be rebutted by any registered users. Since Non-profits and Local or Tribal governments are not linked to specific locations, they will not receive email notifications regarding the rebuttal phase. These challenges will be placed in the 'Open Rebuttals' section in the Navigator and remain open for the rebuttal period.

All rebuttals will be reviewed by the Broadband Office to determine if the rebuttal evidence is sufficient. If rebuttal evidence is sufficient, the challenge is rejected. If the rebuttal evidence is not sufficient, the challenge is sustained.

Final Determination Phase

The Final Determination Phase will occur on a rolling basis for provider specific challenges, and during a state-specified timeframe for those published in the Open Rebuttals list. From the date of the rebuttal, each challenge will have a designated length of time for finalization from the Broadband Office. This length of time is specified in the BEAD Initial Proposal Volume I. Challenge evidence must be fully reviewed by the Broadband Office, and the challenge must be classified as 'sustained' or 'rejected.' At the end of the Rebuttal Phase, an official Final Determination Phase will begin. This phase serves as a buffer and ensures all rebuttals submitted at the end of the Rebuttal Phase have ample time to be accepted or rejected.

Navigator Walkthrough

Public-Facing Mapping Functionality

The BEAD Challenge Navigator features full-screen map viewing with a clean design and intuitive tools and workflows. The following items encompass the core functionality of the public-facing component of the BEAD Challenge Navigator.

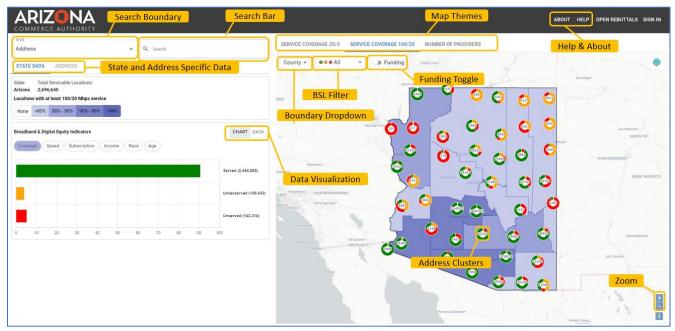


Image 1: Overview of the Broadband Map with labelled features. This image can be used as a reference alongside other images in the document.

Introductory Splash Screen / About / Help content: When the user first enters the website, a splash screen is displayed that contains important information that the State wants to communicate to users. The About and Help content is available to guide users through the application and workflow.

View Broadband Data Coverage / Availability Map: At first glance, users will be presented with the Broadband Availability Map showing 'donut' charts that display the total number of BSLs in the area and their proportion of Unserved, Underserved, and Served status.

Choose from various Broadband Map themes: Users can choose from a pre-set list of map themes that will change the way the broadband availability is displayed on the map. The three themes are Service Coverage 25Mbps/3Mbps, Service Coverage 100Mbps/20Mbps, and Number of Providers. Included is a legend to the left of the screen, explaining the boundaries of each shade of the choropleth visualization.

View Existing Broadband Funding Overlay: An overlay of Broadband Funding can be turned on or off, displaying areas within the State that have received funding.

Select levels of geography: By selecting the boundary dropdown, users can choose to view area boundaries and data by various geographic areas.

Toggle Served / Underserved / Unserved: Users can view or hide all, Served, Underserved, and Unserved BSL as a count when zoomed out, or specific points when zoomed in.

View Broadband & Digital Equity Indicators: Users can gain more insight into broadband availability and demographics based on the geographical boundary selected. Included indicators are Broadband Coverage, Speed, Subscription, Income, Race, and Age. This information can be visually represented in the Chart Tab or numerically viewed by selecting the Data Tab.

Search for a Geographical Area and view broadband details in that Area: Using the Search Boundary dropdown, users are able to search within different geographic boundaries. To search Census Block, Block Group, or Tract, search by the 15, 12, or 11 digit census code. To search by House, Senate, or Congressional District, search by specific number only for the district (e.g. 1, 5). If you do not know the district number, you can use the Boundaries dropdown to explore the different House, Senate, or Congressional Districts in the State.



Image 1.2: Search different areas with the Area Dropdown.

Search for an Address and view broadband details at that Address: Using the address search bar or zooming in and clicking a specific address allows users to see details about the broadband service and funding at that location.

The Broadband Navigator uses a combination of the MapBox geocoder and the FCC Fabric data to search for addresses. When the user enters an address into the search bar the MapBox geocoder will list options for selection. When you click on the address the Navigator will take you to the closest BSL to that location.

In most cases this works perfectly, but there are cases where MapBox cannot match the addresses in the fabric data. In those cases, the user is not taken directly to the BSL and shown a screen that there is no BSL corresponding with the address entered. In other cases, the user will go to a BSL that does not directly correspond with their searched address.

In edge cases if the user is unable to find an address we recommend navigating to the approximate location and selecting the BSL. All BSLs in the fabric are present in the map and can be found, but there are edge cases where the name matching is imperfect.

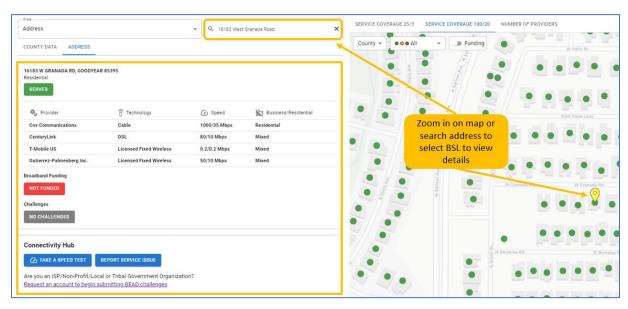


Image 2: Address search and selection view showing broadband service and funding at the location.

Share or Bookmark Map URL allowing selected locations/views to be sent out: The URL for the map can be copied, shared or saved. When clicked or re-opened again by another user (or by the same user as a bookmark) the map will open at the same location and display as was previously set.

Select a Basemap (Street Map or Imagery): Users will have the option to view a basic streetmap or aerial imagery as the underlying basemap.

Public Evidence Submission

Public users can select a BSL and take a speed test or submit evidence for a challenge without the need to register for an account. After selecting a BSL they can choose 'Take a Speed Test' or 'Report a Service Issue' from the Challenge Hub section.

Taking Speed/Latency Tests:

When taking a speed test, users will be prompted to enter their contact information and select their service tier. Additionally, the user will click through several questions pertaining to the quality of their home network (mobile/wireless/wired network, current network bandwidth, and more). The Challenge Navigator will automatically e-mail the user with a link to take another speed test until three speed tests have been taken to comply with BEAD guidance.



Image 3: Take a Speed Test

Submitting problems with service

Service issue challenges available to the public include Availability, Data Cap, and Business Service Only. Once the challenge type is selected, users will be prompted to answer questions pertaining to their provider, property type, and contact information before the opportunity to upload PDF(s), JPEG(s), BMP(s), CSV(s), or Word Document(s) of evidence before submitting the problem for review by the State Broadband Office.

Account Registration

Request a New Account:

Eligible challengers can request an account by either navigating to a particular point on the map or by navigating to the request account page from the login page.

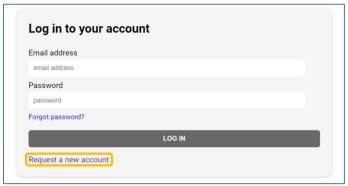


Image 4: Log in screen

- 1. Select the 'Sign In' link in the upper right corner of the application.
- 2. Select 'Request a new account'

- 3. Fill out user information
 - I. *Full name
 - II. *Email address
 - III. *Phone Number
 - IV. *Organization Category
 - i. Unit of Local/Tribal Government
 - ii. Non-Profit Organization
 - iii. Broadband Provider
 - V. *Organization
 - i. Nonprofits and Local/Tribal Governments:
 - 1. Select the Organization dropdown.
 - 2. Scroll through the Organizations to search for your organization.
 - 3. If you do NOT see your organization in the list, select 'Other' and manually enter the name of your organization.
 - 4. If the account request is accepted, the manually entered organization will now be listed in the Organization drop down for all future users to choose from.

Please ensure that the <u>same organization name is used</u> if multiple users are accessing the portal. This will ensure access to challenge review dashboards.

- ii. Broadband Providers:
 - 1. Select the Organization dropdown.
 - 2. Scroll through the Organizations to search for your organization. All FCC filed broadband providers in your state will be listed alphabetically.
 - 3. If you do NOT see your organization in the list, select 'Other' and manually enter the name of your organization.
 - 4. If the account request is accepted, the manually entered organization will now be listed in the Organization drop down for all future users to choose from.

*Please find and select your organization name from the auto populated list. <u>This is critical to ensure challenges will be linked to your account and will be appropriately notified.</u> *

- VI. *Webpage (your organization's URL)
- 4. Select 'Request'
- 5. Request will be reviewed.
- 6. Once accepted, you should receive an email confirmation providing a link to complete the signup process and create a password. This link will only be valid for seven days, at which time it will expire, and a new request will need to be submitted.
- 7. Once the password has been set, the new user can view and use all functionality associated with their organization type.

Manage Users (Broadband Office Only):

The Broadband Office will be given access to the Manage Users dashboard where they can invite, manage, and view pending and approved users. To access the Manage Users dashboard, log in to your Broadband Office account, select the icon in the top right of the application, and click on Manage Users.

User Requests and Management

The Broadband Office admin users can view and manage requests using the Manage Users dashboard. In the Requests section, admin users can accept or reject account registration requests.



Image 4.1: Pending user requests

Admin users may also view all registered users and edit, lock, or delete the accounts in the Users section.

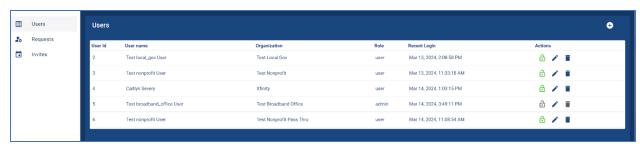


Image 4.2: Manage users

Invite a User

Admin users can invite new users to the application via an interface that is the same as the 'Request an Account' interface. These user accounts are automatically approved.

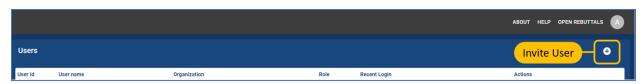


Image 5: Invite a user

- 1. Fill out user information
 - I. * Full Name
 - II. * Email Address
 - III. * Role
 - i. User
 - ii. Admin
 - IV. * Category
 - i. Unit of Local/Tribal Government
 - ii. Non-Profit Organization
 - iii. Broadband Provider
 - iv. Broadband Office
 - V. * Organization
 - i. Inviting Non-Profit Organization and Local/Tribal Governments:

- 1. Select 'Non-Profit Organization', 'Unit of Local/Tribal Government' from the Organization Category dropdown menu.
- 2. If multiple users from the same organization are accessing the portal, ensure that the same organization name is used for all users. This will ensure access to challenge review dashboards.
- 3. If the Organization Name is not listed, select 'Other' at the bottom of the list and manually type the name.
- ii. Inviting Broadband Providers:
 - 1. Select 'Broadband Provider' from the Organization Category dropdown menu
 - 2. Find and select the organization name from the auto populated list. This is critical to ensure challenges will be linked to correct account and will be appropriately notified.
 - 3. If the Organization Name is not listed, select 'Other' at the bottom of the list and manually type the name.
- iii. Inviting Broadband Offices:
 - 1. Select 'Broadband Office' from the Organization Category dropdown menu.
- 2. Select 'Invite'
- 3. An email will be sent to the invited user with a link to complete the signup process and create a password. This link will only be valid for seven days, at which time it will expire, and a new invitation will need to be submitted.
- 4. Once the password has been set, the invited user can view and use all functionality associated with their organization type.

Submitting Challenges

Prioritization of BEAD-relevant challenges

The focus of the state challenge process is on making funding decisions, and on that basis the Broadband Office will deprioritize challenges that would have no effect on whether the location would be eligible for BEAD funding. Check to see if the challenge would have **no effect** and be **deprioritized** by reviewing whether any of the following situations apply:

- -If filing a service level challenge to a location already considered eligible for BEAD funding (i.e. service status is already unserved or underserved and no award of public funding)
- -If challenging a location that would require multiple other challenges (that have not yet been recieved) to have an effect (i.e. location has multiple providers reporting Reliable Broadband Service above 100/20 Mbps, location has one or more providers reporting Reliable Broadband Service above 100/20 Mbps and an award of public funding)

If a challenge is deprioritized, the Broadband Office may still draw on this information after the state challenge process for the purpose of improving general accuracy of broadband mapping.

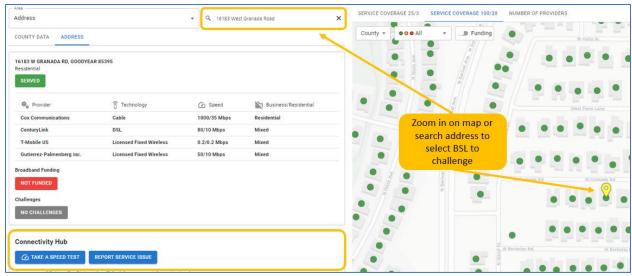


Image 6: Searching for an address and submitting a speed test

By BSL

- 1. Search for the desired BSL by navigating the map or using the 'Search' function in the top left of the application.
- 2. Once you have found your desired BSL, ensure that it is selected and that the correct address is visible in the 'Address' tab to the left of the map.
- 3. The following information for the selected address will be shown:
 - i. Service status
 - ii. Funding status and funding information (if applicable)
 - iii. Available Provider, Technology, and Speed Information
- 4. To submit a challenge, select 'Submit a Challenge' in the 'Connectivity Hub' pane to the left of the map.
- 5. A pop-up window will appear on screen with the option to select your 'Service Issue'. Select from the following list based on the service issue existing at the selected address (the options for 'Service Issue' may change depending on your account type (ISP, Non-Profit, Tribal Government, or Local Government):
 - i. Availability Service Not Available
 - ii. Availability Service Available
 - iii. Data Cap
 - iv. Business Service Only
 - v. Speed
 - vi. Latency
 - vii. Technology
 - viii. Enforceable Commitment
 - ix. Not Part of an Enforceable Commitment
 - x. Planned Service
 - xi. Location is a Community Anchor Organization
 - xii. Location is not a Community Anchor Organization

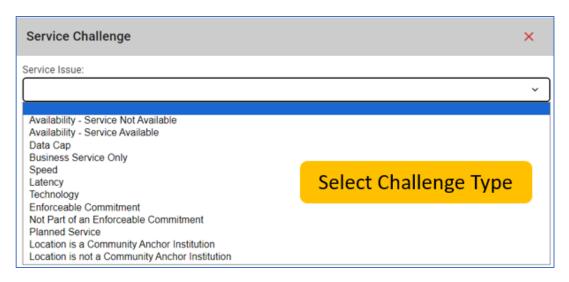


Image 7: Service challenge type dropdown. Please note: the options for 'Service Issue' may change depending on your account type (ISP, Non-Profit, Tribal Government, or Local Government).

- 6. Next, depending on your challenge type, you will be required to answer questions to support your challenge.
 - i. Select the accurate 'Provider Technology Speed', 'Reason', 'Property Type', 'Plan Speeds', etc. from the drop downs.
 - ii. Review the 'Certification of Individual or Certifying Official' and 'Privacy Act Statement'. If all information is accurate and lawful, select the 'Submit' button on the bottom right to complete your challenge.
- 7. Next you will be prompted to submit the appropriate evidence depending on the challenge.

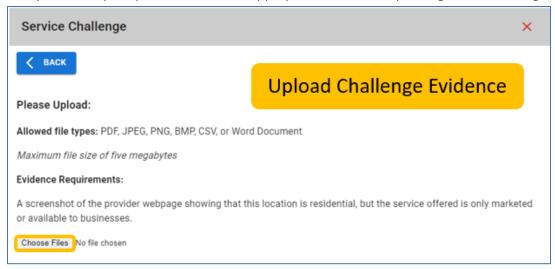


Image 8: Challenge evidence upload

- i. Required evidence for your challenge type will be listed on the 'Evidence Requirement' section (Every challenge will have specific evidence requirements).
- ii. Select 'Choose Files' to add the required evidence.
 - a. All evidence must be in PDF, JPEG, BMP, CSV, or Word Document format.

- b. You may upload any number of files under 5MB each.
- c. If the incorrect evidence is attached by mistake, use the red 'X' to remove the attachment.
- iii. Select 'Next' once the evidence has been successfully attached (denoted with a green check mark). Note: If the evidence does not meet the requirements for the specified challenge type, the challenge will be rejected.
- 8. The challenge will automatically be forwarded to your Broadband Office for review.

Bulk Challenges

Bulk Challenges can be filed for the following challenge types: Enforceable Commitment, Not Part of an Enforceable Commitment, and Planned Service. The remaining challenge types require location-specific evidence (e.g. speed test, refusal of service to address) and must be filed by BSL. Challengers can use area challenge rules (e.g. submitting challenges to 6 locations in a census block group) as a mechanism to challenge more comprehensive areas of the map.

- 1. Zoom into the desired map location until BSL points appear.
- 2. Once you have found the desired area, select the pencil icon to draw a boundary around all desired BSLs with the same challenge provider and type. Remember to close the boundary by connecting the final point to the starting point. If an undesired BSL was included, you can restart the drawing process by selecting the trashcan icon.
- 3. Once the boundary is closed, a 'Service Challenge' window will appear to select the Service Issue from a list of Enforceable Commitment, Not Part of an Enforceable Commitment, and Planned Service.
- 4. Upon selecting your Service Issue, you will be directed to a page to fill in information on the challenge.
- 5. Review the 'Certification of Individual or Certifying Official' and 'Privacy Act Statement'. If all information is correct and lawful, select 'Next'.
- 6. On the next page, you will be asked to submit evidence. The dynamic text displayed on the page will inform you of the type of evidence you will need to submit for the selected challenge type. Select 'Choose Files' to upload evidence. Once complete, click 'Next'.
 - i. Evidence must be in PDF, JPEG, PNG, BMP, CSV, or Word Document format.
 - ii. You may upload any number of files under 5mb each.
 - iii. A green checkmark will appear once the evidence has been successfully attached.
- 7. Once you are satisfied with the evidence selected, select 'Submit' to complete the challenge.

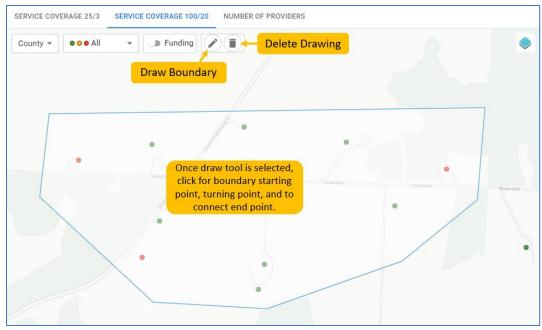


Image 9: Bulk area challenge

Review Challenges

Once evidence is submitted by the public, the Broadband Office and Nonprofit Passthrough organization will be notified daily via email directing them to review submissions in their dashboard. From the dashboard, Broadband Offices or their designees can examine the provided evidence and accept or reject it based on their guidelines of the BEAD Challenge Process. Different eligible challengers (Broadband Providers, NonProfits, Local or Tribal Governments) have specific dashboards to allow them to participate fully in the challenge process.

Non-Profits and Local and Tribal Governments

The 'My Challenges' queue allows local and tribal governments to view the challenges that they have submitted. They can see the status of these challenges as they move through the stages of evidence review, rebuttal, and adjudication. Challenges move to the 'Completed' queue once they have been fully reviewed. For example, a challenge may move into the 'Completed' queue if upon initial review of evidence, the broadband office deems the evidence insufficient. Challenges may also move into the 'Completed' queue following an ISP's failure to rebut or decision to sustain a challenge. Rebutted challenges that have been adjudicated by the broadband office will also fall into the 'Completed' queue.

ISP

Challenges submitted by the ISP will be visible in their 'Created Challenges' section. In addition, they are responsible for reviewing challenges for rebuttal in their 'Awaiting Rebuttal' section of their dashboard. The deadline to review column will display the calculated rebuttal deadline. Upon this date, the challenge will be sustained automatically and enter the 'Completed' section.

Passthrough

The designated Passthrough organization is responsible for reviewing submissions by public users in the 'Evidence Review' section of the dashboard. If accepted, this will generate a challenge in the

Broadband Office's dashboard for review and move to the 'My Challenges' section in the Passthrough dashboard. Evidence submission that has been rejected, along with submissions reviewed by the Broadband Office will enter the 'Completed' state.

Each challenge has its own activity log, which enables the audit of any challenge. Furthermore, each challenge can be assigned to allow for multiple individuals working on a stream of challenges concurrently. Challenges can be commented on, so that any questions or concerns about a particular challenge can be captured throughout the process. Comments are only visible within an organization. Individuals from other organizations including the Broadband Office cannot see comments left by individuals from other organizations. For example, if several individuals are working on behalf of an internet service provider to rebut challenges, their comments are only visible by other providers within that internet service provider's authenticated users.

Area and MDU Challenges

Once evidence for individual BSL challenges has been reviewed and accepted, the system will check whether the State's threshold for multiple BSLs in an area has been met to qualify for an area challenge. If so, the individual challenges are subsumed by the area challenges, and the individual challenges complete and the area challenge takes the place of the individual challenges. There are more robust evidence requirements for rebuttal of an area challenge.

Deadlines are a critical element of the BEAD State Challenge Process. Each challenge will be tagged to alert rebutters or challenge reviewers of the associated deadlines for review of that particular challenge.

Resubmitting a Challenge

If a challenge is denied due to lack of evidence, authorized challengers will have a chance to re-submit the challenge within the Challenge Phase. Challenges that do not meet the acceptable guidelines for evidence may be denied or a request for more evidence may be given. If more evidence is requested, the challenger will receive an email with the information of the challenge that needs to be updated and the reason for rejection. To re-challenge, the challenger must submit an entirely new challenge for the BSL with sufficient evidence. If a re-submission is not entered before the end of the 60-day challenge period, the challenge will be denied.

Rebutting the Challenge

Immediately following the acceptance of a challenge, the rebuttal phase begins. Rebutting parties (typically ISPs) will be notified when there are challenges available to rebut in their dashboards. These notifications will go out once a day. Rebuttable challenges will be accessible in the dashboard or 'Open Rebuttals' page for review and rebuttal by challengers. The directions to rebut are based on organization type:

ISPs: Availability – Service is Available/ Availability –Service is Not Available/ Data Cap/ Business Service Only/ Speed/ Latency/ Technology

- 1. Log into the Navigator using your registered username and password.
- 2. Access the challenge portal by selecting your user icon in the top right of the page and selecting 'Challenge Dashboard.'

- 3. The dashboard will be organized into four sections:
 - I. Awaiting Rebuttal
 - II. Rebutted Challenges
 - III. Created Challenges
 - IV. Completed
- 4. All Availability, Data Cap, Business Service Only, Speed, Latency, and Technology challenges will be listed under the 'Awaiting Rebuttal' tab with all necessary information on the challenge:
 - Challenger
 - II. Assignee
 - III. Bulk Challenge ID (if applicable)
 - IV. Challenge ID
 - V. Challenge Type
 - VI. Submitted Date
 - VII. Deadline to Review
 - VIII. Evidence
- 5. Select the challenge from the list or use the search bar to find a specific challenge.
 - I. If your organization is using the assignments feature, choose 'Assigned to me' in the top right-hand corner to view challenges assigned to you.
- 6. The selected challenge will appear in the pane on the right.
- 7. If there is no evidence to support a rebuttal, the ISP may choose to sustain.
 - I. No further steps will need to be taken; the challenge will automatically be accepted after the 15-day rebuttal period.
- 8. If there is evidence to rebut the challenge, the ISP can choose to submit a rebuttal. To submit a single rebuttal, select 'Rebut this Challenge'.
 - I. Challenges that have a Bulk Challenge ID may be bulk rebut/sustained. To bulk rebut/sustain, select one challenge with the Bulk Challenge ID and navigate to the button in the side bar. Select 'Bulk Rebut' or 'Bulk Sustain' to address every challenge in the Bulk Challenge.
 - i. If the user wishes to partially sustain or reject a bulk challenge, they may do so by addressing the partials one by one and bulk sustaining/rejecting the remainder.

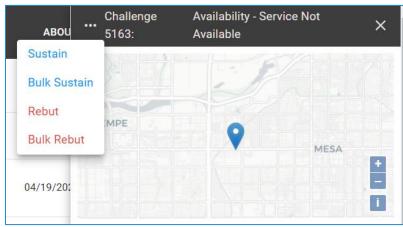


Image 9.1: Bulk Sustain and Bulk Reject

- 9. A pop up will appear with the steps to submit a rebuttal for the challenge(s).
- 10. Provide evidence to support your rebuttal(s):

- I. Required evidence for your challenge type will be listed on the 'Evidence Submission' page.
- II. Select 'Choose Files' to add the required evidence.
 - i. All evidence must be in PDF, JPEG, BMP, CSV, or Word Document format.
 - ii. You may upload any number of files under 5MB each.
 - iii. If the incorrect evidence is attached by mistake, use the red 'X' to remove the attachment.
 - iv. Select 'Next' once the evidence has been successfully attached (denoted with a green check mark).

Note: If the evidence does not meet the requirements for the specified rebuttal type, the rebuttal will be denied.

- 11. Select 'Submit' to submit your rebuttal.
 - I. Your challenge status will now be listed as 'Pending'.

All Users: Enforceable Commitment/ Not Part of an Enforceable Commitment/ Planned Service/ Location is a Community Anchor Institution/ Location is not a Community Anchor Institution

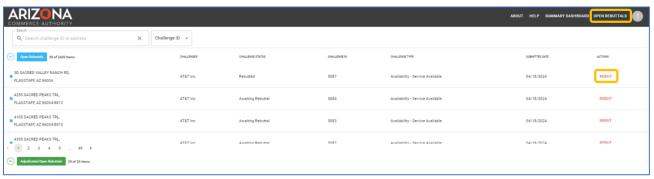


Image 10: Open Rebuttals

- 1. Log into the Navigator using your registered username and password.
- 2. On the top right of the public facing map, you will see an 'Open Rebuttal' section.
- 3. Challenges that are ready for rebuttal will appear as a list giving any authorized user the ability to rebut throughout the State's rebuttal period.
 - a. To search for a specific rebuttal, use the 'Search' bar or scroll through the list manually. Challenges may also be sorted by any field.
 - b. Select your desired challenge to view the corresponding information.
- 4. Once the desired BSL or CAI has been selected, select the 'Rebut' button.
 - a. If you are logged in, this will trigger a window to initiate a rebuttal.
 - b. If you are still not logged in, this will ask you to log into your account to continue with the rebuttal process.
- 5. A pop up will appear with the steps to submit a rebuttal for this challenge.
- 6. Select the 'Reason for Rebuttal' in the provided list and select 'Next.'
- 7. Provide evidence to support your rebuttal:
 - a. Required evidence for your challenge type will be listed on the 'Evidence Submission' page.
 - b. Select 'Choose Files' to add the required evidence.
 - i. All evidence must be in PDF, JPEG, BMP, CSV, or Word Document format.
 - ii. You may upload any number of files under 5MB each.

- iii. If the incorrect evidence is attached by mistake, use the red 'X' to remove the attachment.
- iv. Select 'Next' once the evidence has been successfully attached (denoted with a green check mark).
 - Note: If the evidence does not meet the requirements for the specified rebuttal type, the rebuttal will be denied.
- 8. Select 'Submit' to submit your rebuttal.
- 9. If a challenge does not receive any rebuttals, it will automatically be 'sustained' at the conclusion of the rebuttal period.

Review and Adjudication of Rebuttals

As rebuttals are entered, Broadband Offices and their designees will evaluate rebuttals. From the rebuttal dashboard, rebuttal evidence can be reviewed and sustained or rejected. Rebuttals will be listed as 'Awaiting Approval' until they are approved or denied. If approved the rebuttal will change status to 'Approved.' If denied, the rebuttal status will be changed to 'Rejected.'

Tracking Challenge Status and Updating the Map

As evidence pertaining to a challenge is reviewed and accepted, the public-facing map will update to indicate that the BSL is in a challenged state. Once the challenge has been sustained or rejected, the BSL's status will be updated on the map to indicate the new service categorization (Served, Underserved, or Unserved). This capability allows all stakeholders to stay informed throughout the lifecycle of the challenge process.

Evidence and Documentation

When filing challenges, challengers must provide sufficient evidence to establish the challenge as valid. If your submission does not meet the minimum evidence criteria, the challenge will not be approved and will not move on to the rebuttal phase. Similarly, rebuttals also require adequate evidence to prove the challenge as invalid. Rebuttals without sufficient evidence will be automatically moved to the Final Determination phase. Having the correct evidence and documentation is the most important part of the challenge process. Sufficient evidence to meet challenge and rebuttal guidelines is established in the BEAD Initial Proposal Volume I. Follow the guidelines in Volume I document to ensure that the evidence minimum requirements are met before submitting challenges and rebuttals.

Please note: Challenges submitted with evidence that does not meet the 'Acceptable Evidence Types' will not be accepted. Please follow these quidelines to ensure that challenges and rebuttals are valid.

Conclusion

Thank you for taking part in the State BEAD Challenge Process. Your support is a critical part of the path towards broadband for all.

We hope this guide has enhanced your user experience. If you encounter any issues not covered in this guide, please reach out to your Broadband Office for assistance.

Keep updated on the BEAD Challenge process by visiting your state's site for more information!