



Broadband Navigator[™] User Guide DRAFT

Arizona Commerce Authority February 2024

Table of Contents

Table of Contents	1
Overview	3
Who Can Submit Evidence?	3
Who Can Create Challenges?	3
Types of Challenges	4
Challenge Process Phases Overview	7
Publication of Eligible Locations	7
Challenge Phase	7
Rebuttal Phase	8
Service Level Challenge Rebuttals	8
All Other Challenges - Open Rebuttals	8
Final Determination Phase	8
Navigator Walkthrough	9
Public-Facing Mapping Functionality	9
Introductory Splash Screen / About / Help content:	9
View Broadband Data Coverage / Availability Map:	9
Choose from various Map themes	9
View Existing Broadband Funding:	9
Select levels of geography:	9
View Broadband & Digital Equity Indicators	
Search for an Address and view broadband details at that Address:	
Toggle Served / Underserved / Unserved:	
Share or Bookmark Map URL allowing selected locations/views to be sent out:	11
Select a Basemap (Street Map or Imagery):	11
Public Evidence Submission	11
Taking Speed/Latency Tests	
Submitting problems with service	11
Account Registration	
Request a New Account	
Invite a new User	13
Submitting Challenges	14
By BSL	14

Bulk Challenges16
Review Challenges
Non-Profits and Local Governments17
ISP
Pass-Through18
Area and MDU Challenges
Resubmitting a Challenge
Rebutting the Challenge
ISPs: Availability/ Data Cap/ Business Service Only/ Speed/ Latency/ Technology
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 20
Review and Adjudication of Rebuttals21
Tracking Challenge Status and Updating the Map21
Evidence and Documentation
Conclusion

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 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 Action 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 (Individuals) who would like to submit evidence, see the <u>Public Evidence Submission</u> 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 and Tribal Governments
- 2. Nonprofit Organizations
- 3. Internet Service Providers (ISPs)

Types of Challenges and Evidence

	Challenge type	 Description	Challenge Evidence Examples	– Permissible Rebuttals
A	Availability	The broadband service identified is not offered at the location, including a unit of a multiple dwelling unit (MDU).	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). 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. ¹¹ 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.	Service provider shows that the location subscribes or has subscribed within the last 12 months, e.g., with a copy of a customer bill. 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.
S	Speed	The actual speed of the service tier falls below the unserved or underserved thresholds. ¹²	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. ¹³

Code	Challenge type	Description	Challenge Evidence Examples	Permissible Rebuttals
L	Latency	The round-trip latency of the broadband service exceeds 100 ms. ¹⁴	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. ¹⁵
D	Data Cap	The only service plans marketed to consumers impose an unreasonable capacity allowance ("data cap") on the consumer. ¹⁶	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	The technology indicated for this location is incorrect.	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	The location is residential, but the service offered is marketed or available only to businesses.	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 Examples	Permissible Rebuttals
E	Enforceabl e Commitme nt	The challenger has knowledge that broadband will be deployed at this location by the date established in the deployment obligation.	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	The challenger has knowledge that broadband will be deployed at this location by June 30, 2024, without an enforceable commitment or a provider is building out broadband offering performance beyond the requirements of an enforceable commitment.	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 enforceabl e commitme nt	This location is in an area that is subject to an enforceable commitment to less than 100% of locations and the location is not covered by that commitment. (See BEAD NOFO at 36, n. 52.).	Declaration by service provider subject to the enforceable commitment.	

Code	Challenge type	Description	Challenge Evidence Examples	Permissible Rebuttals
С	Location is a CAI	The location should be classified as a CAI.	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	The location is currently labeled as a CAI but is a residence, a non- CAI business, or is no longer in operation.	Evidence that the location does not fall within the definitions of CAIs set by the Eligible Entity or is no longer in operation	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. Challengers will have 60 calendar days to submit a challenge from the time the initial list of unserved and underserved locations, community anchor institutions, and existing enforceable commitments are posted. The Arizona Commerce Authority State Broadband Office aims to run the Challenge Phase from March 15, 2024, to May 14th, 2024.

Rebuttal Phase

Each challenge will have 15 calendar days 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 service level (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 (enforceable commitment, not part of an 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 of specific challenges but instead will be notified when the rebuttal phase begins. 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 in the last 30 days of the challenge process following the close of the rebuttal phase. 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 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: An overlay of Broadband Funding can be turned on or off using the Funding Toggle, 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.

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, use the Data Visualization tabs to navigate between the two.

Search for a Geographical Area and view broadband details in that Area: Using the Search Boundary, users can search within different geographic boundaries. To search Census Block, Block Group, or Tract, search by the 15-, 12-, or 11-digit census codes.

County	-	Search Aa]
STATE DATA	ADDRESS	Maricopa County	
State Total S Arizona 2,696,	Servicable Locations , 640		١

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.

Address - Q 1454 W Highway 80		vay 80	SERVICE COVERAGE 25/3 SERVICE COVERAGE 100/20 NUMBER OF PROVIDER	
COUNTY DATA	ADDRESS			County + ••• All + Funding
589 W HIGHWAY 8 Residential	0, BISBEE 85603			Zoom in on map or
SERVED				search address to select BSL to view
🕰 Provider	Technology	(2) Speed	Business/Residential	details
Sparklight	Cable	1000/50 Mbps	Mixed	
CenturyLink	DSL	10/1 Mbps	Mixed	
VERIZON	Licensed Fixed Wireless	50/5 Mbps	Residential	Tombstone Canyon Rd. Tombsto
T-Mobile US	Licensed Fixed Wireless	100/20 Mbps	Mixed	S CO
roadband Funding				Internet in the second s
NOT FUNDED				and Board
hallenges				
NOT CHALLENG	ED			•
				eestillee
Service Challe	enges			• • • • • •
TAKE A SPE	EED TEST REPORT SERVIC	FISSUE		West Boulevard West Boulevard

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

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.

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 street map or aerial imagery as the underlying basemap.

Public Evidence Submission

Public users can select a BSL and submit evidence for a challenge (including speed tests). 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). If the tested speed is considered insufficient, users will be guided to a screen to submit evidence. This evidence may be used to file a Speed/Latency, Technology, or Availability Challenge. 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 evidence submission is available to the public. Members of the public may submit evidence documenting issues with Availability, Data Cap, and Business Service Only. Once the

evidence submission 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) 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 selecting the 'Sign In' link in the upper right corner of the application and then selecting 'Request a new account.'

Log in to your acc	ount	
Email address		
email address		
Password		
password		
Forgot password?		
	LOG IN	
Request a new account		

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 Government
 - ii. Non-Profit Organization
 - iii. Broadband Provider
 - iv. Broadband Office
 - V. *Organization
 - i. Nonprofits and Local Governments: Please ensure that the same organization name is used if multiple users are accessing the portal. This will ensure access to challenge review dashboards.
 - ii. Broadband Providers: Please find and select your organization name from the auto populated list. This is critical to ensure challenges will be linked to your account and will be appropriately notified.
 - 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.

Invite a new 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.

					ABOUT HELP OPEN REBUTTALS
Users					Invite User – 📀
User Id	User name	Organization	Role	Recent Login	Actions

Image 5: Invite a user

- 1. Fill out user information:
 - I. * Full Name
 - II. * Email Address
 - III. * Role (select from dropdown)
 - i. User
 - ii. Admin
 - IV. * Category
 - i. Unit of Local Government
 - ii. Non-Profit Organization
 - iii. Broadband Provider
 - iv. Broadband Office
 - V. * Organization
 - i. Inviting Non-Profit Organization and Local Governments:
 - 1. Select 'Non-Profit Organization' or 'Unit of Local Government' from the Organization Category dropdown menu.
 - 2. If multiple users from the same organization are accessing the portal, please 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. Please find and select the organization name from the auto populated list. This is critical to ensure challenges will be linked to the 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

Area Address	,	- Q 1454 W Highv	vay 80	x SERVICE COVERAGE 25/3 SERVICE COVERAGE 100/20 NUMBER OF PROVIDERS
COUNTY DATA	ADDRESS			County - Cou
1589 W HIGHWAY 8 Residential	IO, BISBEE 85603			Zoom in on map or search address to select BSL to challenge
🕏 Provider	Technology	(Speed	Business/Residential	chancinge
Sparklight	Cable	1000/50 Mbps	Mixed	
CenturyLink	DSL	10/1 Mbps	Mixed	
VERIZON T-Mobile US	Licensed Fixed Wireless	50/5 Mbps 100/20 Mbps	Residential	Tombstone Canyon Rd. Tombstone
Broadband Funding NOT FUNDED Challenges NOT CHALLENG				Constant from
Service Challe		EISSUE		Viest Boulevard West Boulevard

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 'Service Challenges' 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:
 - i. Availability
 - ii. Speed
 - iii. Latency
 - iv. Data Cap
 - v. Technology
 - vi. Business Service Only
 - vii. Enforceable Commitment

- viii. Not Part of an Enforceable Commitment
- ix. Planned Service
- x. Location is a Community Anchor Organization
- xi. Location is not a Community Anchor Organization

Service Challenge		×
Service Issue:		~
Availability Data Cap Business Service Only Speed Latency Technology Enforceable Commitment Non-Enforceable Commitment Planned Service Location is a Community Anchor Institution Location is not a Community Anchor Institution Latency Reclassification Location Challenge Download Reclassification Location Challenge	Select Challenge Type	

Image 7: Service challenge type dropdown

6. Once you choose the correct challenge type for the location, the application will prompt you to submit evidence.



Image 8: Challenge evidence upload

- i. Required evidence for your challenge type will be listed on the 'Evidence Submission' page.
- ii. Select 'Choose Files' to add the required evidence.
 - ii. All evidence must be in PDF format.
 - ii. You may upload up to 5 files under 5MB each.
 - ii. If the incorrect evidence is attached by mistake, use the red 'X' to remove the attachment.

Note: Visit the <u>Adobe PDF Converter</u> to easily convert common file types to a PDF format for submission.

- 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.
- 7. The 'Submit Challenge' page will prompt you to complete the challenge:
 - i. Depending on your challenge type, you will be required to answer questions to support your challenge.
 - ii. Select the accurate 'Property Type' in the drop-down. You will have the option to choose from Residential, Business, or Other.
- 8. 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.
- 9. The challenge will automatically be forwarded to your Broadband Office for review.

Bulk Challenges

- 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. On the next page, select 'Choose Files' to upload PDF evidence. Once complete, click 'Next'.
- 5. If the challenge is related to a non/enforceable commitment, enter the name of the Fund before moving to 'Submit' the challenge.



Image 9: Bulk area challenge

Review Challenges

Challenges can be viewed and managed in the Challenge 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. Local Government / Non-Profit.

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.

Non-Profits and Local Governments

The 'My Challenges' queue allows local governments and non-profits 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 submitted against them that require 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.

Pass-Through

The designated Pass-Through 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 Pass-Through dashboard. Evidence submission that has been rejected, along with submissions reviewed by the Broadband Office will enter the 'Completed' state.

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. Area challenges for availability need to be rebutted with evidence that service is available for all BSL within the census block group, e.g., by network diagrams that show fiber or HFC infrastructure or customer subscribers. For fixed wireless service, the challenge system will offer representative random, sample of the area in contention, but no fewer than 10, where the provider must demonstrate service availability and speed (e.g., with a mobile test unit).18

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 period begins. Rebutting parties will be notified at the start of the rebuttal phase via email. In addition, ISPs will be contacted via email each time an individual challenge in their service area is rebutted. These 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/ 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 three sections:
 - I. Created Challenges
 - II. Awaiting Rebuttal
 - III. 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:
 - I. Challenger
 - II. Assignee
 - III. Bulk Challenge ID (if applicable)
 - IV. Provider
 - V. Challenge ID
 - VI. Challenge Type
 - VII. Submitted Date
 - 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 and associated evidence 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 rebuttal, select 'Rebut this Challenge'.
- 9. A pop up will appear with the steps to submit a rebuttal for this challenge.
- 10. Select the 'Reason for Rebuttal' in the provided list and select 'Next.'
- 11. Provide evidence to support your rebuttal:
 - 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 format.
 - ii. You may upload up to 5 files under 5MB each.
 - *iii.* If the incorrect evidence is attached by mistake, use the red 'X' to remove the attachment.
 - Note: Visit the <u>Adobe PDF Converter</u> to easily convert common file types to a
 - PDF format for submission.
 - 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.

12. 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

					ABOUT HELP OPEN REBUTTALS	
Q Search challenge ID or address	X Challenge ID 👻					
Cpen Rebuttais 0 Items	CHALLENGER	CHALLENGE STATUS	CHALLENGE ID	CHALLENGE TYPE	SUBMITTED DATE	ACTIONS
1359 N COLLEGE RD BLDG 2, MASON, MI 48854	Test Broadband Office	Unknown	248	Enforceable Commitment	02/13/2024	REBUT
12676 RETREAT DR, GRAND HAVEN, MI 49417	Test Broadband Office	Unknown	335	Enforceable Commitment	02/24/2024	REBUT
Completed Open Rebustials 0 Items						

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 format.
 - ii. You may upload up to 5 files under 5MB each.
 - iii. If the incorrect evidence is attached by mistake, use the red 'X' to remove the attachment.
 - Note: Visit the Adobe PDF Converter to easily convert common file types to a
 - PDF format for submission.
 - 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, the Broadband Office 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 state's 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 guidelines 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 the application support team for assistance.

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