

MBI

MASSACHUSETTS
BROADBAND INSTITUTE



at the MassTech
Collaborative

BEAD Challenge Process Webinar

Internet Service Providers (ISPs)

June 12th, 2024

Agenda

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BEAD Challenge Overview

The state of Massachusetts received \$147 million funding allocation for its BEAD program. The goal of the BEAD program is to achieve universal service – which means 100% of broadband serviceable locations (BSL's) have the internet available.

MBI objectives from BEAD program

- 01 Unserved Locations (below 25Mbps / 3Mbps)
- 02 Underserved Locations (below 100Mbps / 20Mbps)
- 03 Community Anchor Institutions (CAIs)

BEAD activities Completed to date

- ☑ Five-Year Action Plan Approved
- ☑ Stakeholder engagement and community outreach
- ☑ Initial Proposal Volume I approved including Challenge Process.
- ☑ Initial Proposal Volume II under review by NTIA

BEAD Challenge Process

The State Challenge Process will identify unserved and underserved homes, businesses and institutions in the state to ensure they can get connected to high-speed internet through the BEAD program.

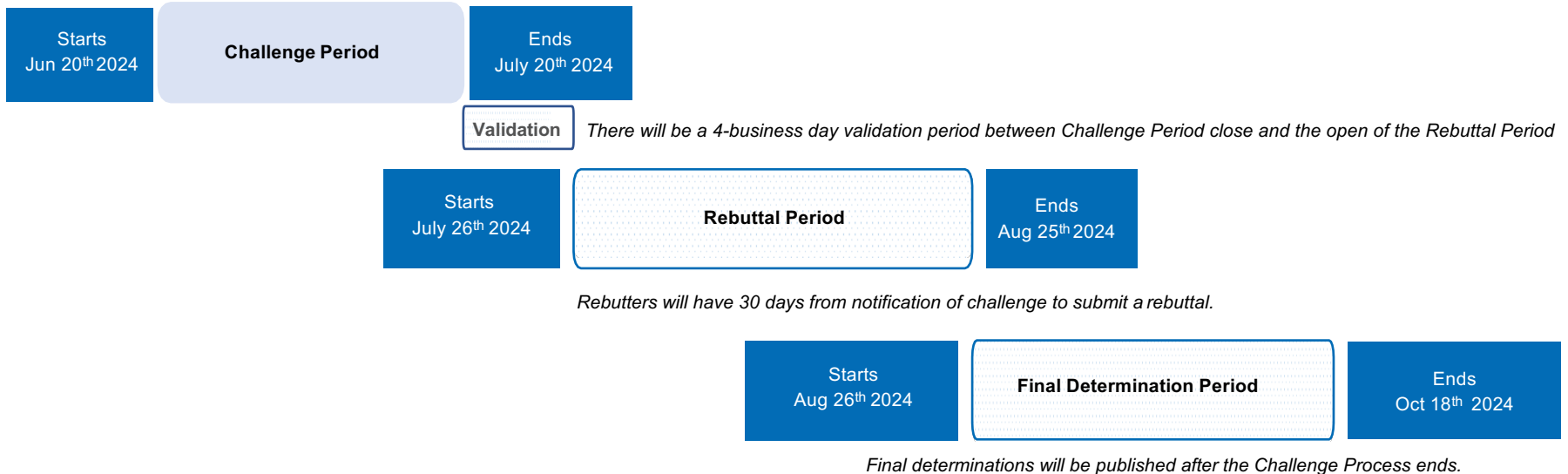
Eligible
Challengers

Internet Service Providers (ISPs) are eligible challengers and rebutters

Challenge Process Timeline

The Federal Communications Commission (FCC) publishes a National Broadband Map. The National Broadband Map is the starting point for BEAD funding eligibility. A location must be marked as unserved or underserved on the FCC map to be eligible for BEAD funds.

The Challenge Process will occur over a 120-day period based on the below timeline:



The Challenge Process begins ahead of the deployment subprogram which is expected to launch in the last quarter of 2024.

Challenge Types

Several types of challenges can be filed by ISPs to reclassify the status of locations.

Code	Challenge Type	Description
A	Availability	Service identified is not offered at the location.
S	Speed	Internet service speed falls below unserved (25/3Mbps) or underserved (100/20Mbps) thresholds.
L	Latency	Round-trip latency of the internet service exceeds 100 milliseconds (ms) threshold.
D	Data cap	Available service plans impose a data cap on the consumer.
T	Technology	Technology indicated for this location is incorrect.
B	Business service only	For residential locations, service offered is marketed or available only to businesses.
E	Enforceable commitment	Location will receive qualifying internet service through an existing funding program.
N	Not part of enforceable commitment	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.
P	Planned service	Planned service will be deployed at a location without an enforceable commitment: <ul style="list-style-type: none"> By Dec. 31, 2024, end-to-end fiber technology.
C, R	Location <u>is a CAI</u> / <u>is not a CAI</u>	Location should be classified as a CAI or the location is labeled as a CAI but is a residence, a non-CAI business, or is no longer in operation.
G, Q	CAI qualifying broadband unavailable/ available	The CAI can or cannot obtain qualifying broadband (not less than 1 Gbps/ 1Gbps and latency less than or equal to 100 ms).

Area and MDU Challenges

MBI will administer Area and MDU challenges for challenge types A, S, L, D, and T. When a threshold is reached, the burden of proof shifts from challengers to broadband providers.

This reclassifies locations as unserved or underserved, requiring providers to submit rebuttals for all affected locations.

Area Challenges

An area challenge is triggered if six (6) or more BSLs using a particular technology and a single provider within a census block group are challenged

MDU Challenges

An MDU challenge is triggered like area challenges by reaching a threshold for a single provider's technology within an MDU. Thresholds: 1 unit for <15 units MDUs, 2 units for 16-24 units, and 3 units for >25 units MDUs.

Bulk Challenges

1

Bulk Challenges involve submitting the same type of challenge for multiple broadband serviceable locations.

2

Bulk challenges represents a number of BSLs that are being challenged for the same reason.

3

Bulk challenges will be permissible for availability, enforceable commitment, and planned service challenge types.

4

When submitting evidence for all locations in a bulk challenge, challengers will need to ensure that the evidence submitted applies to all locations being challenged.

5

To create a bulk challenge, the pencil icon can be used to group locations. Once the locations are grouped and the drawing is fully connected, the challenge submission process will be automatically prompted.

Evidence Requirements

MBI may accept a wide range of data sources to substantiate challenges, as long as any potential source of evidence used to substantiate challenges is documented and verifiable by a third party.

Illustratively, these acceptable challenge evidence include (but not limited to):

Code	Challenge Type	Sample of Acceptable Challenge Evidence
A	Availability	Screenshot of provider webpage.
S	Speed	Speed test by subscriber, showing the insufficient speed and meeting the requirements for speed tests.
L	Latency	Speed test by subscriber, showing the excessive latency.
D	Data cap	Screenshot from provider website; Service description provided to consumer.
T	Technology	Manufacturer and model number of residential gateway (CPE) demonstrates service is delivered via a specific technology.
B	Business service only	Screenshot of provider webpage.
E	Enforceable commitment	Enforceable commitment by service provider (e.g., authorization letter).
N	Not part of enforceable commitment	Declaration by service provider subject to the enforceable commitment.
P	Planned service challenge	Construction contracts or similar evidence of on-going deployment, including the expected date of deployment must be on or before December 31, 2024.
C	Location is a CAI	Evidence that the location falls within the definition of CAI's set by MIHI.
R	Location is Not a CAI	Evidence that Institution does not fall within the definitions of CAI's set by MIHI or is no longer in operation.
G	CAI: Qualifying Broadband Unavailable	Evidence that the CAI has tried to acquire qualifying broadband but has been unsuccessful.
Q	CAI: Qualifying Broadband Available	Evidence that the CAI can acquire symmetric gigabit service.

Rebuttal Types

Providers will have 30 calendar days from the launch of the Rebuttal Phase to provide rebuttals to MBI. The rebuttal period begins with all challenges being provided to providers at the same time at the opening of the rebuttal window on July 26.

ISPs may receive notification to rebut the following challenges:

Availability, Speed, Latency, Data Cap, Technology, Business Service

- Submit evidence service is provided at the challenged location(s).
- Submit evidence speed is sufficient at the challenged location(s).
- Submit evidence latency is at or below 100 milliseconds.
- Submit evidence an unreasonable data cap is not being imposed.
- Submit evidence that the appropriate gateway matches the provided service.
- Submit evidence that service is available for residential customers, not only businesses.

Community Anchor Institutions (CAI)

- Submit evidence the location is (or is not) a CAI, as defined in Initial Proposal Volume I.
- Submit evidence that qualifying broadband service is(or is not) available to a CAI.

Fixed Wireless

- Submit evidence that 100/20 Mbps or better is provided at the challenged location(s).
- Submit evidence showing sufficient network capacity to simultaneously serve at least 80% of locations in the claimed coverage area reported as served only by cellular fixed wireless.

Enforceable Commitment

- Submit evidence that demonstrates the ability to meet the commitment in question.

DSL

- No rebuttals may be submitted for DSL challenges.

Planned Service

- Submit evidence that the provider is no longer able to meet the commitment (e.g., is no longer a going concern).
- Submit evidence that the planned deployment does not meet the required technology or performance requirements.

Challenge & Rebuttal Outcomes

MBI will review the submitted evidence by the Rebutter to arrive at a final determination of the challenge.

There are two outcomes from the evidence review

Rebuttal is considered “Valid”

The evidence submitted is valid based on the allowable evidence guidance and supports the submitted rebuttal.

Rebuttal is Rejected

The evidence submitted is not valid based on the allowable evidence guidance OR the document submitted is illegible. Rejected rebuttals can be resubmitted within the allowable window.

Once the challenge has gone through the challenge period, and the rebuttal window has closed, MBI will announce whether a challenge is “Sustained” or “Rejected” 60 days following the end of the rebuttal phase.

MBI will publish an initial list of the eligible locations on their website at the end of the final determination phase

Resources



Upcoming Webinars

BEAD Challenge Process - CAI Overview -
Wed., June 12 11:00 a.m.

[Register](#)

BEAD Challenge Process - ISP Overview -
Wed., June 12 2:00 p.m.

[Register](#)



Office Hours

June 11 | 1:00 p.m. - 2:00 p.m.

[Join Here](#)

June 21 | 10:00 a.m. - 11:00 a.m.

[Join Here](#)

June 27 | 12:00 p.m. - 1:00 p.m.

[Join Here](#)



Volume I & Resources

Massachusetts Initial Proposal
Volume 1 (PDF) [Download Here](#)

Underserved Locations (CSV) [Download Here](#)

Unserved Locations (CSV) [Download Here](#)

Community Anchor Institutes (CSV)
[Download Here](#)

FCC Broadband Serviceable Locations by
Municipality (PDF) [Download Here](#)



Past Webinars

The Bead Challenge Process

May 22, 2024

[Download Presentations \(PDF\)](#)

April 4, 2024

[View Recording \(Video\)](#)

[Download Presentation \(PDF\)](#)

June 5, 2024

[View Recording \(Video\)](#)

[Download Presentation \(PDF\)](#)



Technical Assistance

[FAQs, April 2024 \(PDF\)](#)

[Challenge Portal User Guide \(PDF\)](#)

[Evidence Submission Guidelines \(PDF\)](#)
Coming Soon

[Area & Multiple Dwelling Unit \(MDU\)
Challenges Flyer \(PDF\)](#)

[BEAD Challenge Process Overview Flyer
\(PDF\)](#)

[Community Anchor Institutions Flyer \(PDF\)](#)



Contact Us

If you would like support from MBI's
contracted partner Connected Nation
email: mabeadsupport@connectednation.org.

To contact MBI directly with questions
email: mapfeedback@masstech.org.

Bookmark this page and [subscribe](#) to our
email newsletter for updates.

Next Steps – Invitation to Participate

- Register for an account in the [Massachusetts Broadband Map & Portal](#)
- Keep an eye out for more Technical Assistance materials that will be posted to the MBI [BEAD Challenge Process Webpage](#)
 - Evidence Submission Guidelines – Coming soon!
- Be ready to participate!
- Contact MBI
 - mapfeedback@masstech.org
- Attend Office Hours
 - June 21 at 10:00 a.m. - 11:00 a.m.
 - June 27 at 12:00 p.m. - 1:00 p.m.

How to Use the Challenge Portal

AppGeo Demo

- ❑ Registration and account requests
- ❑ Submitting challenges
- ❑ Submitting rebuttals
- ❑ Submitting bulk challenges
- ❑ Submitting inverse availability challenge
- ❑ Submitting Area/MDU challenges
- ❑ Open rebuttal dashboard

Q&A



Additional Resources

Challenge Process resources can be found at MBI's website:
[Massachusetts BEAD Challenge Process | MBI \(masstech.org\)](https://www.masstech.org/ChallengeProcess)

For portal or challenge related questions email us at:
mapfeedback@mastech.org



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