

2024

IDAHO BEAD CHALLENGE PROCESS USER GUIDE



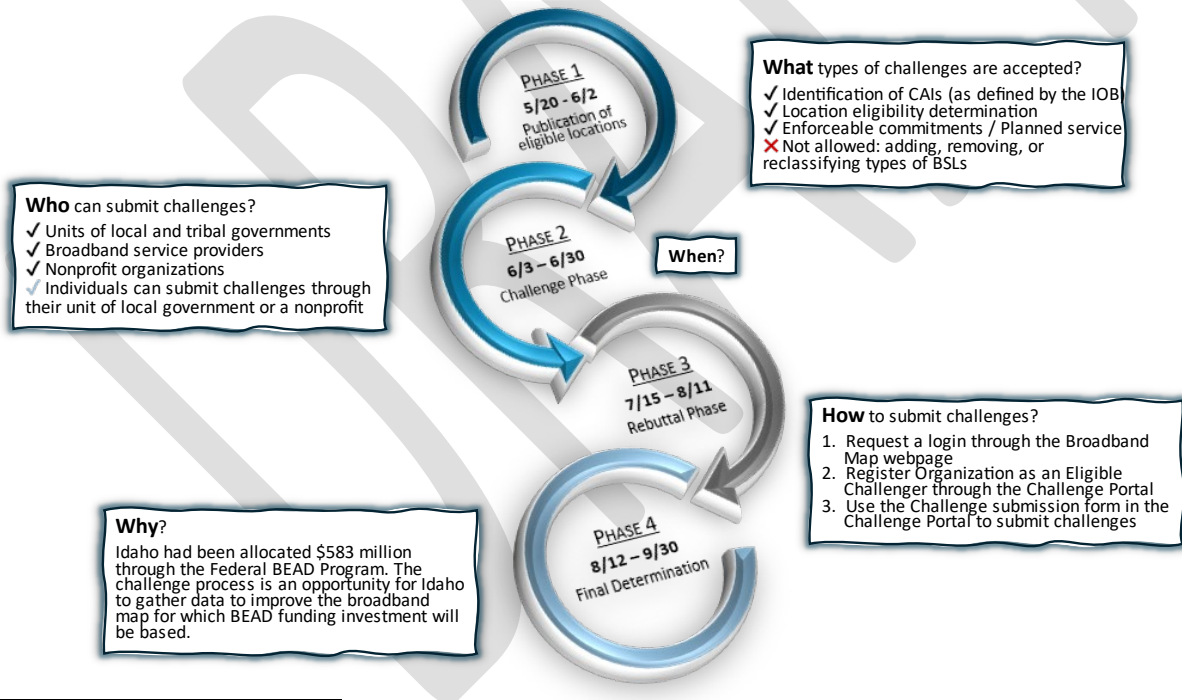
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SUMMARY

The Idaho Office of Broadband (IOB) presents this user guide as a resource for navigating Idaho’s Challenge Process. The purpose of this document is to outline a transparent, fair, expeditious and evidence-based challenge process, present any requirements and expectations with clarity, and guide eligible challengers through each phase of the process. Any questions should be directed to broadbandGIS@commerce.idaho.gov.

The Broadband Equity Access and Deployment (BEAD) Program¹, established by the Infrastructure Investment and Jobs Act (IIJA) of 2021, awarded Idaho \$583,256,249.88 to achieve reliable, affordable, and high-speed internet coverage across the state. This funding will establish the critical infrastructure that drives economic opportunities, expands access to healthcare services, enriches educational experiences for students, and improves the overall quality of life for Idahoans. Idaho will prioritize its BEAD funding to extend high-speed broadband infrastructure to the 92,471 unserved and 63,723 underserved² Broadband Serviceable Locations (BSLs) that have been identified on the Federal Communication Commission’s (FCC) Broadband Serviceable Location Fabric along with all identified Community Anchor Institutions (CAIs)³ lacking access to 1 Gigabytes per second (Gbps) symmetrical broadband connectivity.



¹ <https://broadbandusa.ntia.doc.gov/news/latest-news/ntias-role-implementing-broadband-provisions-2021-infrastructure-investment-and>

² Definitions of unserved and underserved can be found in the glossary of this document or in the NTIA Frequently Asked Questions and Answers, page 5: https://broadbandusa.ntia.doc.gov/sites/default/files/2022-09/BEAD-Frequently-Asked-Questions-%28FAQs%29_Version-2.0.pdf

³ IOB compiled a CSV file that identifies all eligible CAIs, per guidelines set forth in the NOFO (Requirement 1.3.2) and received NTIA approval along with the IOB’s Initial Proposal approval on April 18, 2024.

I. TIMELINE

The challenge process conducted by the IOB will include four main phases, spanning up to 120 days. The following outline includes actions relevant to the timeline.



Phase 1: Publication of Eligible Locations: 2 weeks (May 20th @ 9am MT – June 2nd)

- Review IOB Broadband Map and User Guide
- Request a login to view Idaho's Challenge Portal
- Speed test data collection (acceptable within 60 days prior to the beginning of the challenge phase)
- Identify BSLs to challenge and determine type of challenges
- Gather necessary evidence to support challenge submissions
- Participate in open office hours

Phase 2: Challenge Phase: 28 days (June 3rd @ 9am MT– June 30th @ 11:59pm MT)

- Submit challenges through the IOB Challenge Portal
- Each challenge must include documents in accordance with IOB's [Challenge Types](#) and Evidence Standards provided within section IV.C of this document.
- It is recommended to submit challenges early. If any errors exist, there *may* be an opportunity to re-submit *within* the Challenge Phase window, but that opportunity is not guaranteed.
- ISPs will be notified of contested service location, to include Area and MDU, challenges at the end of the challenge phase.

Phase 3: Rebuttal Phase: 28 days (July 15th @ 9am MT – August 11th @ 11:59pm MT)

- Since the intention of the challenge process is to modify the BEAD eligibility status, rebuttals will only be accepted for locations where a successful challenge would result in a modification of the eligibility status for the affected location.
- For challenges directed against providers, only the challenged provider may submit a rebuttal. For other challenge types, any Eligible Challenger may submit a rebuttal and the challenge will stay open for the whole rebuttal phase.

- It is recommended to submit rebuttals early. If any errors exist, there *may* be an opportunity to re-submit *within* the Rebuttal Phase window, but that opportunity is not guaranteed.

Phase 4: Final Determination Phase: 30-64 days (August 12th – September 30th)

- IOB will fully review challenges and rebuttals and complete final determinations.
- True-up will utilize the FCC Version 4 (V4) release changes
- Another round of deduplication⁴
- IOB submits final challenge results to NTIA for review and approval
- NTIA communicates determination to IOB
- IOB publishes final determinations

A. Permissible Challenges

Per NTIA guidelines, the IOB will only allow challenges on the following grounds:

- ✓ Identification of CAIs (as defined by the IOB)
- ✓ CAI BEAD eligibility determinations
- ✓ Location eligibility determinations for existing Broadband Serviceable Locations (BSLs)
- ✓ Enforceable commitments
- ✓ Planned service with completion date of June 30th, 2024

Adding BSLs, removing BSL, or reclassifying BSL types is not allowed for the BEAD program. However, a collection of this data is important to the Idaho Office of Broadband for continual rectification of the National Broadband Map (NBM) and the Challenge Portal is set up to receive identification of non-BSLs.

B. Eligible Challengers

During the BEAD Challenge Process, per NTIA guidelines⁵, the IOB will only allow challenges from:

- ✓ Nonprofit organizations
- ✓ Units of local and tribal governments
- ✓ Internet service providers

While residents and businesses are not allowed to submit challenges directly to the State, they are an essential part of the challenge process. For many types of challenges, the data

⁴ Deduplication is part of the Eligible Entity's Pre-Challenge Process Modification outlined by the NTIA in the Policy Notice section 6.2, page 10 https://www.ntia.gov/sites/default/files/2023-11/bead_challenge_process_policy_notice.pdf

⁵ https://broadbandusa.ntia.doc.gov/sites/default/files/2024-02/BEAD_Challenge_Process_Policy_Notice_v1.3.pdf

submitted by the permissible challengers will be gathered directly from residents and/or businesses that have not been provided the level of internet service that is reportedly available to them.

C. CostQuest Fabric licenses

A CostQuest license is not required to file challenges directly through IOB's Challenge Portal. However, if you are considering submitting planned service (P) or enforceable commitment (E) challenges, or downloading FCC data for any other reason, we recommend you obtain a license.

The NTIA entered into a contract with CostQuest to cover the cost of these licenses, so there is no expense with the Tier D or Tier E licenses.

Tier D License - is available to all qualified, or presumptively qualified, recipients and subrecipients of federal broadband grants. This license is available to broadband providers, including co-ops, and units of Tribal governments. [Request License](#)

Tier E License - is intended for units of local government, non-profits, and other organizations that will participate in the challenge process, but do not participate in federal programs. [Request License](#)

D. Data Layers used for Broadband Map

- FCC's National Broadband Map availability data published on November 28, 2023
- NTIA's National Broadband Availability Map (NBAM) data
- ESRI Living Atlas Availability Summaries (Counties, Tracts, Block Groups, and Blocks)
- Enforceable Commitments: FCC location points granted Federal or State funding allocated for the improvement of internet services and availability.
 - The CFAC Broadband Grant initiative grant program (the "Program for Public Safety and Local Government")⁶
 - Capital Projects Fund (CPF) Broadband Infrastructure Grant Program⁷
 - The Enhanced Alternative Connect America Cost Model (A-CAM)⁸
 - The Rural Digital Opportunity Fund (RDOF)⁹
 - The Rural Development Broadband ReConnect Program¹⁰
 - The Tribal Broadband Connectivity Program (TBCP)¹¹
 - Federal deduplication layers were downloaded from NBAM's "Idaho Planning

⁶ State of Idaho Public Broadband Grant https://commerce.idaho.gov/content/uploads/2020/06/State-of-Idaho-Public-Broadband-Grant-Application-Public-Safety-and-Local-Government_FINAL-1.pdf

⁷ <https://commerce.idaho.gov/press-releases/idaho-capital-projects-fund-broadband-grant-program-open-now/>

⁸ <https://docs.fcc.gov/public/attachments/FCC-23-60A1.pdf>

⁹ <https://www.fcc.gov/auction/904>

¹⁰ <https://www.usda.gov/reconnect>

¹¹ <https://www.ntia.gov/category/tribal-broadband-connectivity-program>

Toolkit" and other funding sources, such as recently awarded CPF grants from the State of Idaho records.

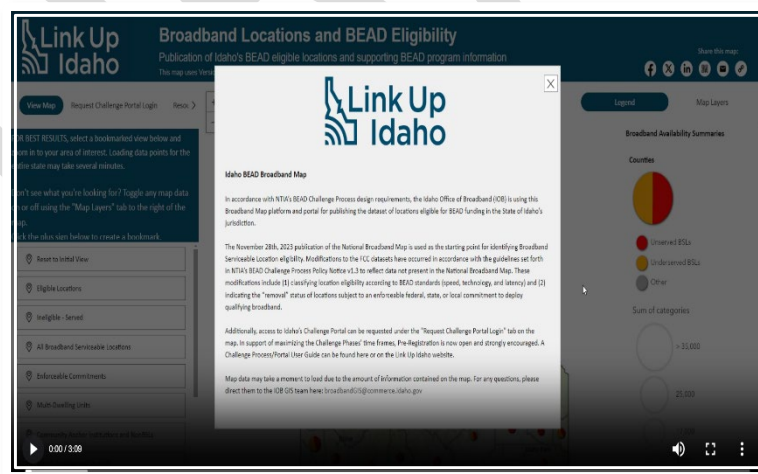
- IOB's finalized CAI list reflecting locations currently lacking access to symmetrical 1 Gigabit-speed broadband service. These locations were then classified as eligible CAIs.
- Underserved and unserved downloaded from NBAM's "Idaho Planning Toolkit", updated version 4/3/24
- NTIA's BEAD Match Waived (EHC Locations)¹²
- Ookla Speed Test Summaries 2023 (Tracks, Block Groups, Blocks, and 500m Hexbins)
- NTIA Permitting and Environmental Information Application map layers¹³
 - BIA AIAN National LAR, USA Federal Lands, and Corps Projects

II. PUBLICATION OF ELIGIBLE LOCATIONS AND BROADBAND MAP

The Idaho Broadband Map with eligible locations can be accessed through the [Link Up website](#) or accessing this [link](#).

Broadband Map and Login Demonstration

The public-facing Broadband Map is limited to FCC Location ID and does not include addresses. In accordance with Idaho's CostQuest license, a login is required to gain access to the full data within the Challenge Portal. The form to request individual accounts is located under the 'Request Challenge Portal login' button on the left of the page. A full description of login questions can be found in Appendix A as well as the demo video here.



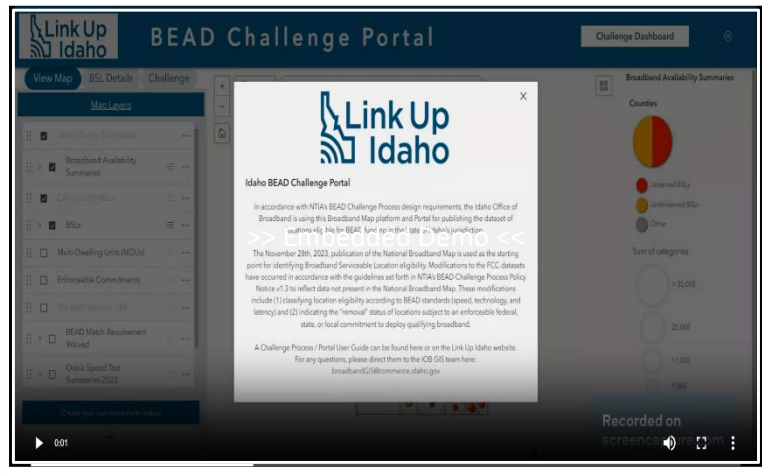
¹² <https://www.internetforall.gov/program/broadband-equity-access-and-deployment-bead-program/bead-allocation-methodology>

¹³ <https://nbam.maps.arcgis.com/apps/instant/portfolio/index.html?appid=c7906b72e14045bf9fa6fe9add469a0>

III. CHALLENGE PORTAL

Register Organization as an Eligible Challenger →

Although accounts to view the more comprehensive map as described above are set up on an individual basis, only one registration for each Eligible Challenger is allowed. This organizational registration differs from an individual login because this is the only type of account with permission to submit challenges. As part of the registration process, the IOB will issue an Organization ID, which will be needed later when submitting challenges and/or rebuttals. A full description of Eligible Challenger registration questions can be found in Appendix B as well as the demo video here.



For each organization, the registration form will ask the following information:

- Type of Entity
- Organization name
- Physical Address
- Webpage URL
- Primary contact full name
- Primary contact phone number
- Valid email address with entity affiliated domain
- Evidence to verify Organization identity (ex: using official letterhead)
- Provider ID / FRN (ISPs only)
- Tribe name as listed by the Bureau of Indian Affairs (Tribes only)
- Nonprofit registration (ex: tax-exempt form) (Non-Profit Organizations only)

After registration is submitted, an email will be sent to verify the email address is valid. Each request will be manually reviewed before it is approved and a notification of registration will be sent, along with the unique Organization Text Key assigned by the IOB. The organization text key will be required for submitting challenges and rebuttals.

Pre-Registration is recommended for completion of the review process prior to the Challenge Phase.

IV. CHALLENGES

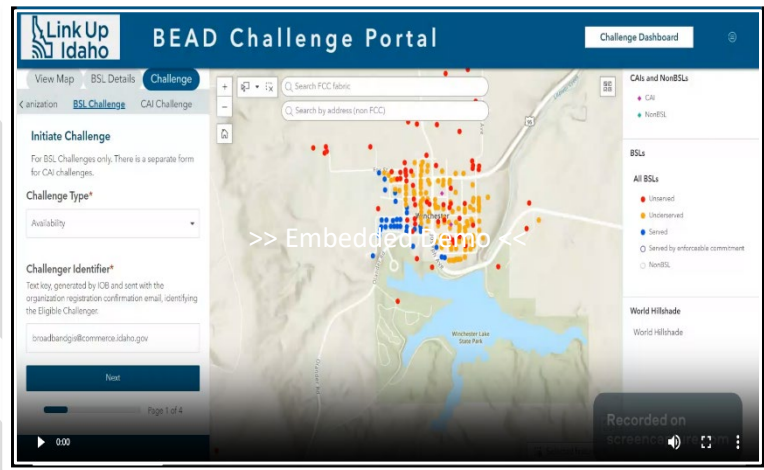
The Challenge Phase will run for 28 calendar days immediately following Phase 1: Publication of Eligible Locations. During this phase, eligible challengers will be able to submit challenges through the Challenge Portal using their organization credentials. The minimum level of evidence required varies by challenge type and is described later in this section.

Once challenges are determined to have the minimum level of evidence required, the status will be changed to “challenged”. Users can view the status¹⁴ of their *own* challenges on the Challenge Portal dashboard. Challenges submitted by others will only become viewable at the start of the Rebuttal Phase.

Though not all successful challenges will result in a modification of the eligibility status for the affected location¹⁵, submission of all challenges is still encouraged. There is the possibility for a challenge to become effective because of additional challenges. All submitted challenges for the same challenge type, technology, and ISP within a Census block group will be considered for the purposes of reaching the area or multi-dwelling unit (MDU) challenge thresholds.

A. Challenge Submission

After an organization has obtained an Eligible Challenger account and text key, they will have access to the Challenge Submission forms. BSL and CAI challenges are submitted in separate forms. Detailed written instructions can be found in Appendix C (BSLs) and D (CAIs) of this document as well as the demonstration video here.



B. Area and MDU Challenges

An area challenge is triggered if six or more different BSLs with the *same* challenge type, using the *same* technology from the *same* provider, and within the *same* census block group are challenged. The six or more challenged BSLs could be the result of one organization

¹⁴ Status Buckets are described in the glossary: (1) Initial Review (2) Challenged (3) Disputed (4) Final Review (5) Sustained (6) Rejected (7) Withdrawn (8) Final Review

¹⁵ For example, if there are two providers reporting coverage at 100/20 Mbps and only one of those providers is challenged, the challenged provider will not be required to submit a rebuttal for that location.

challenging 6 or more different BSLs or a combination of challenges from different organizations that add up to 6 or more.

An MDU challenge is triggered by challenges with the same Location ID of at least three units, or 10% of the unit count listed in the Fabric, whichever is larger.

C. Challenge Types and Evidence Standards

The specific evidence that is required for a challenge is described below. This evidence must be uploaded with the challenge submission as a single PDF per challenge (exception: separate CSV if applicable, as described below). Documents must be readable, all required evidentiary information be unredacted and include dates relevant to the challenge. Insufficient evidence may cause a challenge to be rejected.

Evidentiary documents containing IP addresses, subscriber names, and street address are considered PII and will not be disclosed to the public (e.g., as part of the Challenge Portal).

1. Provider Service Level Challenges

Availability: Code A

Availability challenges are accepted on an individual basis only. This challenge type is determining the lack of eligible (according to BEAD standards) broadband service existing at a BSL location. One of the following must be selected as the challenge reasoning:

Availability (A)	1. Provider failed to schedule a service installation within 10 business days of a request.	2. Provider did not install the service at the agree-upon time.	3. Provider requested more than the standard installation fee to connect the location.	4. Provider denied the request for service.
	5. Provider does not offer the technology at this location as identified on the Broadband Map.	6. Provider does not offer the speed(s) shown on the Broadband Map for purchase at this location.	8. No wireless signal is available at this location (only for technology codes 70 and above).	9. New, non-standard equipment had to be constructed at this location.

Acceptable evidence formats: An official letter, email from liable sender (e.g., city official), screenshot of provider's webpage, terms of service / service description, end-user contract or offer, geotagged picture of infrastructure evidence. Evidence document must include the location address and a date.

Speed: Code S

Speed challenges are applicable to BSLs that the National Broadband Map shows as having access to eligible service (speeds over 100 Mbps / 20 Mbps). Evidence for this challenge type requires the median of three speed tests by subscriber. These subscriber speed tests also need to meet all the following requirements:

Speed (S)	<ul style="list-style-type: none"> ✓ Doesn't predate the beginning of the challenge period by more than 60 days. 	<ul style="list-style-type: none"> ✓ Three speed tests taken at least 24 hours apart. The days do not have to be adjacent. 	<ul style="list-style-type: none"> ✓ Median result of the three speed tests is below 100/20 Mbps
	<ul style="list-style-type: none"> ✓ Certification of the speed tier the customer subscribes to (e.g., a copy of the customer's last invoice). Only subscribers of tiers at or above 100/20 Mbps are considered. 	<ul style="list-style-type: none"> ✓ Signed agreement granting access to these information elements to the Idaho Office of Broadband, any contractors supporting the challenge process, and the internet service provider. 	<ul style="list-style-type: none"> ✓ Name, street address, time and date, and IP address. All information must be specific to the conducted speed tests and consistent between all three.

Acceptable speed tests, meeting all requirements above, can take four forms:

1. The IOB provides free-of-charge speed tests using the Ookla platform, which captures a reading of the available speeds within the residential gateway web interface. Eligible challenging organizations can request a custom Speed Test Tool by emailing broadbandGIS@commerce.idaho.gov. Use of this tool is preferred over other speed test applications since it will ensure consistency in methodology. The tool is set up with automatic reminders for the required second and third tests and will also help organizations keep speed test data, gathered on their behalf, in a single location. Only this option is authorized for submitting multiple sets of challenges in a single CSV.
2. A reading of the physical line speed provided by the residential gateway (i.e., DSL modem, cable modem (for HFC), optical network terminal (for FTTH), or fixed wireless subscriber module).
3. A reading of the speed test, found on the service provider's web page.
4. A speed test, performed on a laptop or desktop computer within immediate proximity of the residential gateway, using speed test applications. The IOB recommends the Ookla speed test application for this use.

NOTE: Even if a particular service offering is not meeting the speed threshold, the eligibility status may not change due to another provider offering speeds 100/20 or higher. However, all challenges are still encouraged as additional challenges may modify the conditions thus altering the eligibility status.

Latency: Code L

Latency challenges are accepted on an individual basis only. Evidence requirement: Speed test by subscriber, showing excessive round-trip latency of broadband service. (exceeds 100ms).

Acceptable evidence formats: An official letter, email from liable sender. Evidence must include the location address and the test date.

Data Cap: Code D

Data Cap challenges are accepted on an individual basis only.

Data Cap (D)	The only service plans marketed to consumers impose an unreasonable capacity allowance on the consumer. (a cap of 600 GB or less per month before overage charges are added)	<i>Acceptable evidence formats:</i> official letter, email from liable sender, screenshot of provider's webpage, terms of service / service description, end-user contract or offer. Evidence document must include the location address and a date.
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NOTE: A successful challenge may not change the status of the location to unserved or underserved if the same provider offers a service plan without an unreasonable capacity allowance at speeds equal or greater than 100/20 Mgbps or if another provider offers reliable broadband service without an unreasonable cap at that location.

Technology: Code T

Technology challenges are accepted on an individual basis only.

Technology (T)	Evidence showing the manufacturer and model number of residential gateway (CPE) delivering service via a technology other than indicated on the National Broadband Map.	<i>Acceptable evidence formats:</i> official letter, email by liable sender, screenshot including an address, terms of service / service description, end-user contract or offer. Evidence documents must include the location address and a date.
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Business Service Only: Code B

Business Service challenges are accepted on an individual basis only.

Business Only (B)	The location is residential, but the service offered is marketed or available only to businesses.	FCC's National Broadband Map data showing residential (R) location codes with only business (B) service offerings.	<i>Acceptable evidence format:</i> screenshot of related table. Evidence document must include the location address and a date.
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2. Previous Investment Challenges

Enforceable Commitment: Code E

Enforceable Commitment (E)	1. In the case of Tribal Lands, challenger must submit the requisite legally binding agreement between the relevant Tribal Government and the service provider for the locations.		2. Enforceable commitment by service provider.
	Evidence must include <u>all</u> of the following:		
	✓ Authorization letter - agreement to include obligation deployment speeds, technology, latency (under 100ms), confirmed fully deployed date as required, and service type being made available (R, B, X)	✓ CSV of all locations included in the funded award.	✓ If available, methodology used to match awarded locations to FCC location IDs

Not part of Enforceable Commitment: Code N

Not Enforceable Commitment (N)	1. If locations are on Tribal lands and have not already been constructed, the Tribal Government may challenge based on a failure of the provider to obtain consent from the Tribal Council for the application and/or receiving the award.	2. Declaration by service provider subject to the enforceable commitment.	3. Documentation that the provider has defaulted on the commitment or is otherwise unable to meet the commitment.	4. Documentation that the locations are in an area subject to an EC not committed to covering 100% of locations. Evidence must include a CSV of location IDs not a part of the EC.
	<i>Acceptable evidence formats:</i> public notice, default notice sent to provider, official letter, or email from liable sender. Evidence must include an attestation for authenticity.			

Planned Service: Code P

Planned Service (P)	Evidence must include <u>all</u> of the following:		
	1. Contracts or a similar binding agreement between Idaho and the 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). Include deployment speeds, technology, and latency being provided.		2. Evidence that deployment will be completed, which must be on or before June 30, 2024.
	Additional evidence should include as much of the following as possible:		
	✓ Evidence all necessary permits were obtained.	✓ Planned network diagrams.	✓ Inspection results.

NOTE: The ISP filing deadline for fixed and mobile availability data for FCC V3 fabric was September 15, 2023¹⁶. All ISP serviced locations prior to this date should be included in the version of fabric Idaho is using. The ISP filing deadline for FCC V4 fabric was March 1, 2024¹⁷. Modifications of served locations within this timeframe should be included in V4 of the fabric which will be tried up post Challenge Process. If there is a concern that the availability adjustments may not be included in V4, an ISP may submit a P challenge but must include the BDC submission receipt as evidence. All other existing service edits must be addressed with the BDC using the traditional routes.

3. Community Anchor Institution Challenges

CAI challenges are coded either C, R, or A as described below. All CAI challenges are accepted on an individual basis only. To further identify the type of CAI institution for the challenge, use the following subcodes:

S	Public or private K-12 schools; Tribal schools	P	Public housing organizations
L	Libraries	C	Community support organizations
H	Health clinic, health center, hospital, or other medical providers	R	Recreation, community, and senior centers
F	Public safety entity	G	Government facilities
E	Institutions of higher education		

Location is a CAI: Code C

Description: Location falls within the definitions of CAIs set by the IOB and should be classified as a CAI. One of the following must be selected as the challenge reasoning:

- D. Location satisfies the definition of a CAI established by the IOB
- N. New CAI (i.e., CAI established or to be operational by June 30, 2024)
- I. Independent location (i.e., this CAI is affiliated with a listed CAI, but is a separate location and requires its own broadband service)
- T. Type of CAI is wrong in IOB’s list of CAIs. Evidence should clearly identify the existing listing and the type of CAI the challenger believes to be correct.
- O. Other

Location is a CAI (C)	Evidence should include as much of the following as possible:		<i>Acceptable evidence formats:</i> registration documents, official letter, or email from liable sender. Evidence document must include the location address and a date.
	Official name of institution and identification number	Explanation of organization facilitating greater use of broadband to vulnerable populations.	

¹⁶ <https://www.fcc.gov/sites/default/files/national-broadband-map-2023-key-dates.pdf>

¹⁷ <https://www.fcc.gov/sites/default/files/national-broadband-map-2024-key-dates.pdf>

Location is a not CAI: Code R

Description: Location does not fall within the definitions of CAIs set by the Idaho Office of Broadband. One of the following must be selected as the challenge reasoning:

- X. CAI has ceased operation. Evidence requires date CAI ceased operations
- B. Location does not require fiber broadband service appropriate for CAI (i.e., location is a remote field station affiliated with a university)
- R. CAI is a private residence or a non-CAI business, (i.e., a former school building has been converted into an apartment building.)
- D. Location fails to meet the definition of a CAI established by the IOB
- O. Other

Acceptable evidence formats: official documents, official letter, or email from liable sender. Evidence document must include the location address and a date.

CAI: Qualifying Broadband Availability: Code A

Two additional CAI challenge codes (Q and G) were added to NTIA’s Policy Notice 1.3, released in February 2023. Since this was after Idaho’s Initial Proposal Volume 1 submission, Idaho has set up location service challenge Code A to accept both CAI service challenges. Qualifying CAI broadband is symmetrical gigabit speed with latency less than or equal to 100ms.

CAI: Qualifying broadband Availability (A)	1. Qualifying broadband is offered at the location and the broadband maps says it is not.	2. Qualifying broadband is not offered at the location and the broadband maps says it is.	3. Location does not have a connection readily scalable to qualifying broadband requirements over the existing infrastructure.	4. CAI has tried to acquire service but has been unsuccessful.
	<i>Acceptable evidence formats:</i> recent invoice, photo of provider gateway, or signed attestation. Documentation must include the location address and a date and, if applicable, provider name, technology, and speeds offered in the current plan.			

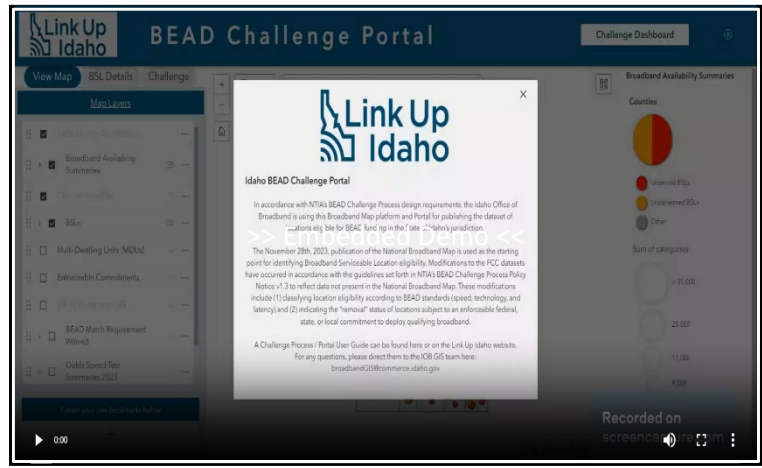
D. Tracking Challenge Status

Challengers can find a challenge’s status on the Challenge Dashboard. The status of each challenge is listed under the status column. Detailed written instructions on where to find the status of submitted challenges can be found in Appendix E as well as the demonstration video.

Review Process:

1. Documents will be evaluated against the evidence requirements outlined above in this chapter. Newly submitted challenges will be assigned the status of “Initial Review”.

2. If a challenge does not meet the required level of evidence, the challenge 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. If sufficient evidence is not submitted before the close of the Challenge Phase, the challenge will be denied. The IOB's request for more evidence is not guaranteed, it is dependent on the time constraints of the phases.



3. Valid challenges will be assigned the "Challenged" status.
4. For provider level challenges, the challenged ISP will be notified via verified email.

V. REBUTTALS

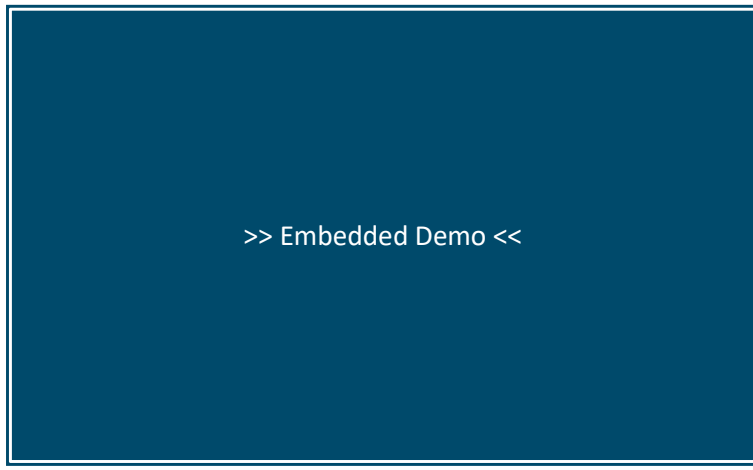
The Rebuttal Phase will run for 28 calendar days following the Challenge Phase. During this phase, eligible challengers will be able to submit rebuttals through the Challenge Portal. Rebuttals will be reviewed on a rolling basis. Once determined to have the minimum level of evidence requirements, the challenge status will be changed to “disputed”.

For challenges directed against providers, only the challenged provider may either agree with the challenger or submit a rebuttal. For other challenge types, any eligible challenger may submit a rebuttal. If no rebuttal is filed against a challenge during the Rebuttal Phase, the challenge status will be changed to “sustained”.

Municipalities and non-profit organizations will receive an email notification when the Rebuttal Phase has opened. However, they will not receive direct notifications for specific challenges since they will not be named parties in the challenges. Accordingly, these challenges will remain open for the entirety of the 28-day period.

A. Rebuttal Submission

Links for submitting a rebuttal are found on the Challenge Dashboard. Detailed written instructions for the rebuttal process can be found in Appendix F of this document and in the demonstration video.



B. Evidence Standards for Rebuttals

The specific evidence that is required for a rebuttal is described below. This evidence must be uploaded with the rebuttal submission as a single PDF per rebuttal (exception: separate CSV, if applicable, as described below). Documents must be readable, unredacted and include dates relevant to the challenge. Insufficient evidence may cause a challenge to be rejected. If time allows, efforts will be made to let an organization revise the rebuttal, but this allowance is not guaranteed.

Evidentiary documents containing IP addresses, subscriber names, and street address are considered PII and will not be disclosed to the public (e.g., as part of the Challenge Portal)

1. Service Level Challenge Rebuttals

Availability Rebuttal

Availability rebuttals are accepted on an individual basis only.

Availability (A)	1. Provider shows that the location subscribes to or has subscribed within the last 12 months.	2. Service is now available as a standard installation (e.g, copy of offer sent to location).	3. Provider has countervailing evidence from their network management system showing an appropriate residential gateway that matches the provided service.
	<i>Acceptable evidence formats:</i> recent invoice, photo of provider gateway, or screenshot of provider’s webpage. Documentation must include the location address and a date.		

Speed Rebuttal

Speed rebuttals are accepted on an individual basis only. Evidence showing countervailing speed tests by provider (e.g., from their own network management system), meeting sufficient speed and all the following requirements:

Speed (S)	✓ Three measurements, taken on different days between the hours of 7pm and 11pm local time. Days do not need to be adjacent. Median of the three speed tests is used.	✓ Each measurement must include the time and date conducted.	✓ Each measurement must include the provider-assigned internet protocol (IP) address identifying the residential gateway where the test was conducted.
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Latency Rebuttal

Latency rebuttals are accepted on an individual basis only. Countervailing speed tests by provider (e.g., from their own network management system) showing latency at or below 100 Mbps (See Speed rebuttal requirements above).

Data Cap Rebuttal

Data cap rebuttals are accepted on an individual basis only. Provider terms of service showing that it does not impose an unreasonable data cap or offers another plan of 100/20 Mbps or higher, at the location, without an unreasonable cap.

Technology Rebuttal

Technology rebuttals are accepted on an individual basis only. The provider has countervailing evidence from their network management system showing an appropriate residential gateway that matches the provided service for the challenged location.

Business Service Only Rebuttal

Business service rebuttals are accepted on an individual basis only. Documentation from provider showing the service listed in the BDC is available at the location and is marketed to residential consumers.

Area Rebuttals

An area challenge is triggered if six or more different BSLs are challenged with the *same* challenge type, using the *same* technology from the *same* provider, and within the *same* census block group are challenged.

Area challenges will be accepted in a multi-rebuttal CSV format. The provider must demonstrate that they are indeed meeting the availability, latency, data cap and/or

technology requirement, respectively, for all (served) locations within the area. The provider can use any of the permissible rebuttals described in this document for the respective challenge type.

Availability challenges need to be rebutted with evidence that service is available for all their served BSLs by network diagrams that show fiber / HFC infrastructure or customer subscribers.

Availability challenges for fixed wireless service: the IOB will offer a representative random sample of the area (census block group) in contention, but no fewer than 10, where the provider must demonstrate service availability and speed (e.g., with a mobile test unit). The random sampling from the area being challenged may or may not be the particular locations in the original challenge that triggered the area challenge.

Multiple Dwelling Units Rebuttal

An MDU challenge is triggered by challenges with the same Location ID, of at least three units or 10% of the unit count listed in the Fabric, whichever is larger.

MDU challenges will be accepted in a multi-rebuttal CSV format. The provider must demonstrate that they are indeed meeting the availability, latency, data cap and technology requirement, respectively, for all units within the MDU being challenged.

2. All Other Challenges – Open Rebuttals

Enforceable Commitment Rebuttal

Any eligible challenger may file a rebuttal if they have documentation that the provider has defaulted on the commitment, is otherwise unable to meet the commitment, or that the location(s) are in an area that are subject to an enforceable commitment to less than 100% of locations and the location(s) are not covered by that commitment.

Acceptable evidence formats: public notice, default notice sent to provider, official letter, or email from liable sender. Evidence must include a date and an attestation for authenticity. A CSV of location IDs within the Enforceable Commitment challenge being disputed should also be included.

Not part of Enforceable Commitment Rebuttal

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.

Only the provider with the challenged Enforceable Commitment can submit a rebuttal to a Not Part of an Enforceable Commitment Challenge.

Not Enforceable Commitment (N)	Evidence must include all of the following:		
	✓ Authorization letter - agreement to include obligation deployment speeds, technology, latency (under 100ms), confirmed fully deployed date as required, and service type being made available (R, B, or X)	✓ CSV of funded locations included in award	✓ If available, methodology used to match awarded locations to FCC location IDs
	The rebuttal must produce evidence that counters the challenge and may include the following:		
	✓ Evidence that provider has not defaulted on the commitment	✓ Evidence that the provider is able to meet the commitment	✓ Evidence that 100% of the locations are covered by the commitment

Planned Service Rebuttal

Any eligible challenger may submit a rebuttal for a Planned Service challenge. The rebuttal must include countering evidence that demonstrates the provider is no longer able to meet the commitment or that the planned deployment does not meet the required technology, performance requirements, or will not meet the deployment date of June 30, 2024. It is anticipated that the primary rebuttals will be submitted by units of Local or Tribal government that have knowledge and evidence that necessary permits, reviews, or other pre-construction requirements have not been met.

Location is a CAI Rebuttal

CAI rebuttals are accepted on an individual basis only. Any eligible challenger may submit a rebuttal for a Location is a CAI challenge. The rebuttal must include countering evidence showing the location does not fall within the definitions of CAIs set by the IOB (e.g., location is a residence, a non-CAI business, etc.) or is no longer in operation.

Location is not a CAI Rebuttal

CAI rebuttals are accepted on an individual basis only. Any eligible challenger may submit a rebuttal for a Location that is not a CAI challenge. The rebuttal must include countering evidence showing the location falls within the definitions of CAIs set by the IOB or is still operational. Evidence must include the official name of the institution and identification number.

CAI Eligibility Rebuttal

CAI rebuttals are accepted on an individual basis only. Any eligible challenger may submit a rebuttal for a CAI Eligibility challenge. The rebuttal must include countering evidence showing the CAI can (or cannot) obtain qualifying broadband service (symmetric gigabit and latency less than or equal to 100ms). Documents must include date, provider name, technology, and speeds.

C. Tracking Rebuttal Status

Challengers can find the challenge's status on the Challenge Dashboard. The status of each challenge is listed under the status column.

Review Process:

1. Documents will be evaluated against the outlined evidence requirements within this guide.
2. If a rebuttal does not meet the required level of evidence, the rebuttal 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 about the rebuttal that needs to be updated along with the reason for the rejection. If sufficient evidence is not submitted before the close of the Rebuttal Phase, the rebuttal will be denied – the challenge will be “sustained” (accepted). The IOB's request for more evidence is not guaranteed since it depends on time constraints of the phases.
3. Valid rebuttals will change the status from "Challenged" to “Disputed” showing that a challenge has received a rebuttal.
4. A challenge status will change to “Final Review” when the rebuttal is in the review process.
5. Provider service level challenges may reach a final determination before the conclusion of the Rebuttal Phase. If that occurs, the challenge status will update to either “Sustained” or “Rejected”. Open rebuttals will remain open until the close of the Rebuttal Phase to allow for all responses.

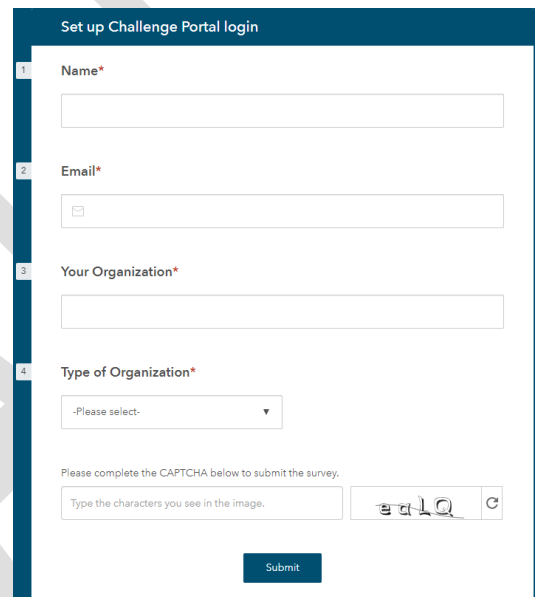
VI. APPENDIX

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A. Request Challenge Portal login form is found on the [Broadband Map](#) page, left side, under the 'Request Challenge Portal Request' tab. All questions are required.

1. Name: first and last name
2. Email: professional email; will be used to create account username
3. Your organization: official name of your affiliate organization involved in the BEAD process
4. Type of Organization options include:
 - Unit of local government
 - Unit of tribal government
 - Nonprofit organization
 - Broadband service provider
 - N/A
5. CAPTCHA helps protect you and IOB from spam and password decryption by asking you to complete a simple test that proves you are human and not a computer.



Intake form to create a BEAD account; required to access Idaho's Challenge Portal

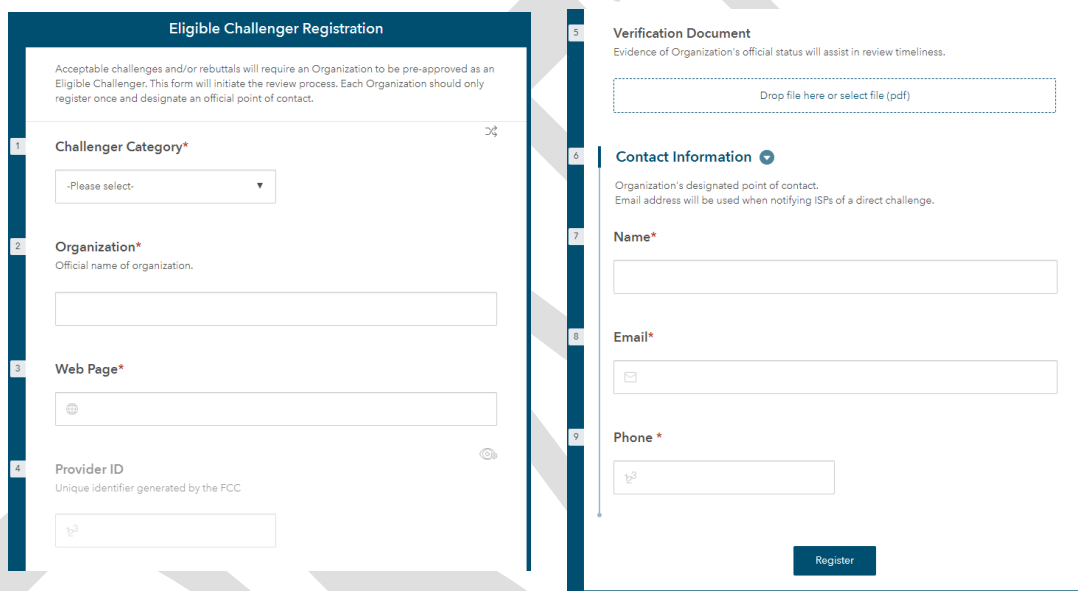
B. Eligible Challenger Registration form is found on the [Challenge Portal](#) page under the 'Challenge' tab. This is a required step for organizations to be vetted as a qualified entity type and to obtain their IOB generated text key which is needed to submit challenges. Please allow up to 3 business days for the IOB to review and approve your organization.

1. Challenger category options include:
 - Unit of Local Government (L)
 - Tribal Government (T)
 - Nonprofit Organization (N)
 - Internet Provider (B)
2. Organization: official name of organization; include state if unit of local government

3. Web Page: company’s official website URL
4. Provider ID¹⁸ (if applicable): unique 6-digit code generated by the FCC
5. Verification Document: not required, but will help make the review process quicker

Contact Information: of the person designated to receive notifications from the IOB concerning challenges

6. Name: full name of the individual contact associated with the organization’s challenges
7. Email: professional email or organization generic email address if preferred.
8. Phone: phone number in case the email address is invalid



Intake form to register organization; required to submit challenges

C. BSL Challenge Submission Form

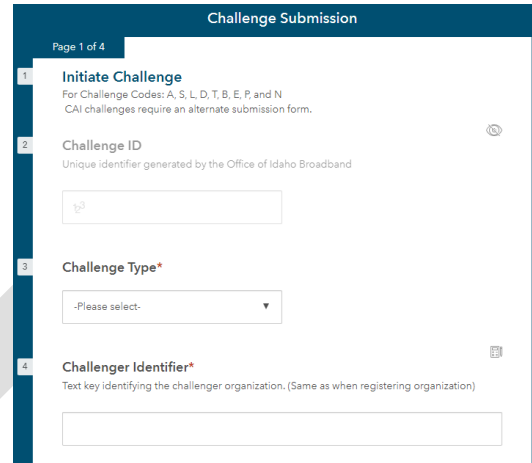
There are two separate forms for Challenges. ‘BSL Challenge’ is for all service level challenges, enforceable commitments, and planned services. ‘CAI Challenges’ is specific to CAI challenges and their category codes. Both forms are found on the Challenge Portal under the ‘Challenge’ tab. Evidentiary documents will need to be in a single PDF. There are several free online resources available for combining PDF documents into one.

¹⁸ For list of service IDs, see “BDC Provider ID Table of Service Providers (column hoconum),” Federal Communications Commission, <https://us-fcc.app.box.com/v/bdcprovideridtable>

Challenge Submission, page 1 of 4

3. Challenge Type options include:
 - Availability
 - Speed
 - Latency
 - Data Cap
 - Technology
 - Business Service Only
 - Enforceable Commitment
 - Planned Service
 - Not part of Enforceable Commitment

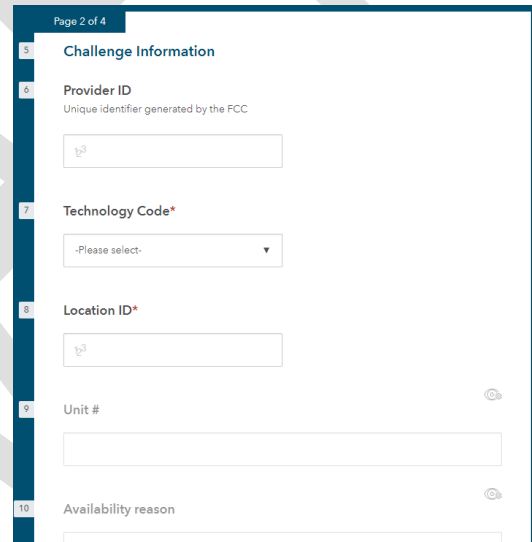
4. Challenger Identifier: IOB generated text key is found in email confirming the organization was reviewed and an account had been created.



BSL challenge submission form; page 1 of 4

Challenge Information, page 2 of 4

6. Provider ID (if applicable): unique 6-digit code generated by the FCC that identifies each service provider.
7. Technology Code: for the technology of the service being challenged, as shown on the Broadband Map.
 - 10 – Copper Wire
 - 40 – Coaxial Cable / HFC
 - 50 – Optical Carrier / Fiber to the Premises
 - 60 – Geostationary Satellite
 - 61 – Non-geostationary Satellite
 - 70 – Unlicensed Terrestrial Fixed Wireless
 - 71 – Licensed Terrestrial Fixed Wireless
 - 72 – Licensed-by-Rule Terrestrial Fixed Wireless
 - 0 – Other



BSL challenge submission form; page 2 of 4

8. Location ID: unique identifier for the location from the BSL Fabric at which the fixed availability information is being challenged.
9. Unit (if applicable): the apartment where service is being challenged. Omit “Apt” and “#”. Leave empty if service for whole location is being challenged.
10. Availability reason: evidence or reason for the availability challenge
 1. Provider failed to schedule a service installation within 10 business days of a request.
 2. Provider did not install the service at the agreed-upon time.

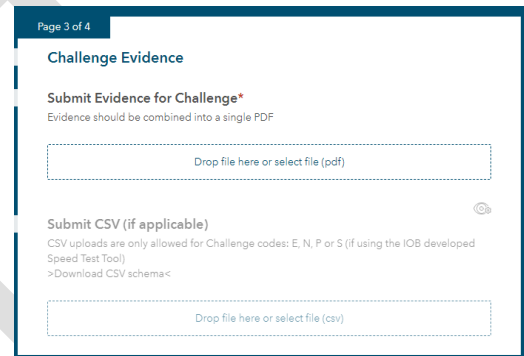
3. Provider requested more than the standard installation fee to connect the location.
4. Provider denied the request for service.
5. Provider does not offer the technology entered above at this location.
6. Provider does not offer the speed(s) shown on the Broadband Map for purchase at this location.
8. No wireless signal is available at this location (only for technology codes 70 and above).
9. New, non-standard equipment had to be constructed at this location.

Challenge Evidence, page 3 of 4

12. Submit Evidence for Challenge: PDF upload of evidence file

13. Submit CSV (if applicable):

- Overall, Idaho is not accepting bulk challenges, however there are some exceptions.
- Exceptions include (1) A single project area (polygon) for an Enforceable Commitment or Planned Service challenge which may contain multiple locations and (2) Speed challenges that have been collected using the IOB developed Speed Test Tool exclusively.
- Those who intend to submit an admissible batch CSV will need to work with the IOB GIS team to acquire the schema template. It is important to submit only those locations that need to be challenged and that proper evidence is provided. If an invalid challenge is found in the dataset, the entire submission will be returned to the challenger for revision.

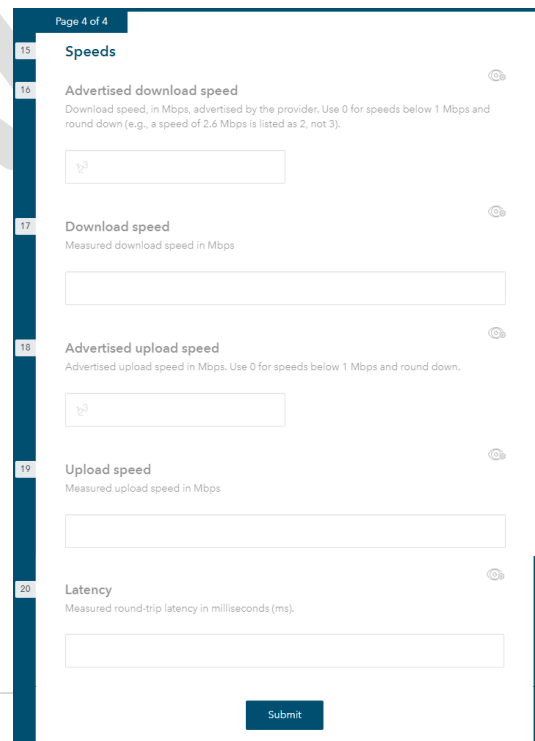


BSL challenge submission form; page 3 of 4

Speeds (if applicable), page 4 of 4

16. Advertised download speed: download speed, in Mbps, advertised by the provider. Use 0 for speeds below 1Mbps and round down (e.g., a speed of 2.6 Mbps is listed as 2, not 3).

17. Download speed: Measured or available download speed in Mbps.



BSL challenge submission form; page 4 of 4

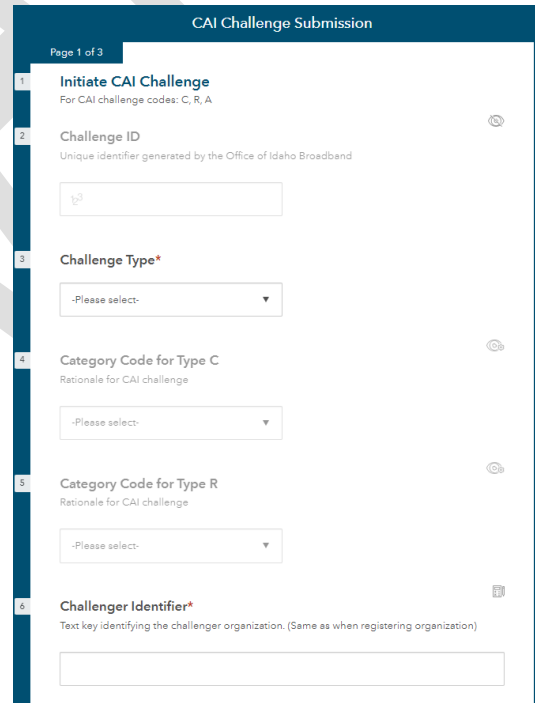
- 18. Advertised upload speed: Advertised upload speed in Mbps. Use 0 for speeds below 1 Mbps and round down. (e.g., a speed of 2.6 Mbps is listed as 2, not 3)
- 19. Upload speed: Measured or available upload speed in Mbps.
- 20. Latency: Measured round-trip latency in milliseconds (ms).

* * *

D. CAI Challenge Submission Form

CAI Challenges, page 1 of 3

3. Challenge Type options include:
 - C - Location is a CAI
 - R - Location is not a CAI
 - A - Gigabit Broadband Available
 - A - Gigabit Broadband Unavailable
4. Category Code for Type C options include:
 - D - Location satisfies the IOB definition of a CAI
 - N - New CAI (operational by June 30, 2024)
 - I - Independent location (Ex: this CAI is affiliated with a listed CAI but is a separate location and requires its own broadband service)
 - T - The CAI type is incorrect
 - O - Other
5. Category Code for Type R options include:
 - X - CAI has ceased operations
 - B - Location does not require fiber broadband service appropriate for CAI (Ex: the location is a remote field station affiliated with a university)
 - R - Location is mislabeled in the CAI list; CAI is a private residence or a non-CAI business (Ex: a former school building has been converted into an apartment building)
 - D - Location fails to meet the IOB definition of a CAI
 - O - Other
6. Challenger Identifier: IOB generated text key is found in email confirming the organization was reviewed and an account had been created.



The screenshot shows a web form titled "CAI Challenge Submission" with a progress indicator "Page 1 of 3". The form contains the following sections:

- 1. Initiate CAI Challenge**: For CAI challenge codes: C, R, A.
- 2. Challenge ID**: Unique identifier generated by the Office of Idaho Broadband. Includes a text input field.
- 3. Challenge Type***: A dropdown menu with the option "-Please select-".
- 4. Category Code for Type C**: Rationale for CAI challenge. Includes a dropdown menu with the option "-Please select-".
- 5. Category Code for Type R**: Rationale for CAI challenge. Includes a dropdown menu with the option "-Please select-".
- 6. Challenger Identifier***: Text key identifying the challenger organization. (Same as when registering organization). Includes a text input field.

CAI challenge submission form; page 1 of 3

Challenged CAI Information, page 2 of 3

8. Type of CAI¹⁹:

- S - School: All public and private K-12 schools and identified in either the FCC E-Rate entity²⁰ data or the National Center for Education Statistics in the categories “public schools” or “private schools.” This category also includes tribal schools.
- L - Library: All public libraries as identified in the FCC E-Rate entity¹⁹ data or the U.S. Department of Homeland Security HIFLD database²¹.
- H – Health clinic: Includes hospitals, urgent care centers, and VA facilities from the U.S. Department of Homeland Security HIFLD database²⁰ as well as nursing homes from the state of Idaho databases. This category also includes tribal health care facilities.
- F - Public safety entity: Includes entities such as fire houses, emergency medical service stations, police stations, sheriff and constable offices, and public safety answering points (PSAP).
- I - Institutions of higher education: including colleges, universities, junior colleges, community colleges, technical colleges, minority-serving institutions, and job training centers
- P - Public housing organization: including local and tribal housing authority facilities. Public housing was identified using the National Housing Preservation Database (NHPD)²²
- C - Community support organization: Recreation, community, and senior centers that facilitate greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals.
- G – Government facility: local, state, federal, or tribal government buildings, where citizens go to interact with or receive services from government institutions.

CAI challenge submission form; page 2 of 3

9. Official name of CAI

¹⁹ Full list of IOB CAI definitions is in the Initial Proposal Vol. I submitted to the NTIA and approved April 18, 2024

²⁰ <https://opendata.usac.org/E-rate/E-Rate-Entity-Search-Tool/59r2-zbdq>

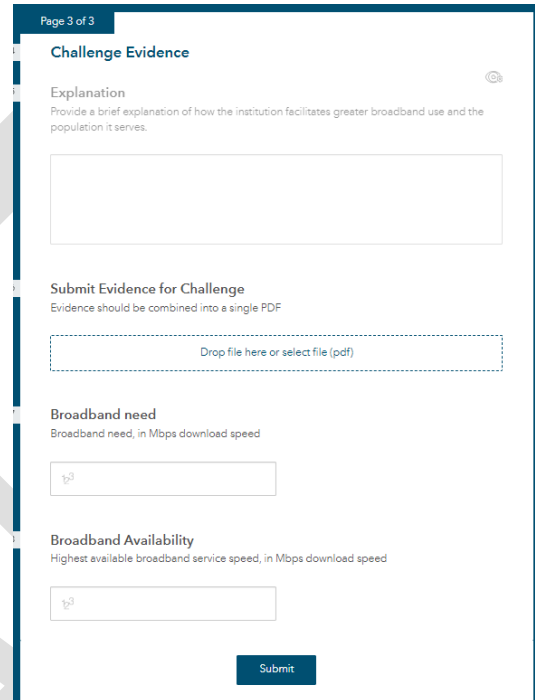
²¹ <https://hifld-geoplatform.opendata.arcgis.com/>

²² <https://preservationdatabase.org/>

10. CAI Street address: number and street name, city, state, and zip code
11. E-Rate ID: USAC assigns a unique identifying number to each school or library that participates in the E-Rate program. This entity number is mandatory if CAI participates in the E-Rate program. Leave empty for CAIs that are not type S or L or do not participate.
12. CMS number: The CMS certification number (CCN)²³ for CAIs of type H only.
13. Location ID: The identifier for the BSL from the National Broadband Map. Leave empty if the CAI has no location ID.

Challenged Evidence, page 3 of 3

15. Explanation: For CAIs of type C (community support organizations), provide a brief explanation of how the institution facilitates greater broadband use and the population it serves.
16. Submit Evidence for Challenge: PDF upload of evidence file
17. Broadband need: download speed in Mbps
18. Broadband availability: highest available broadband service download speed, in Mbps.



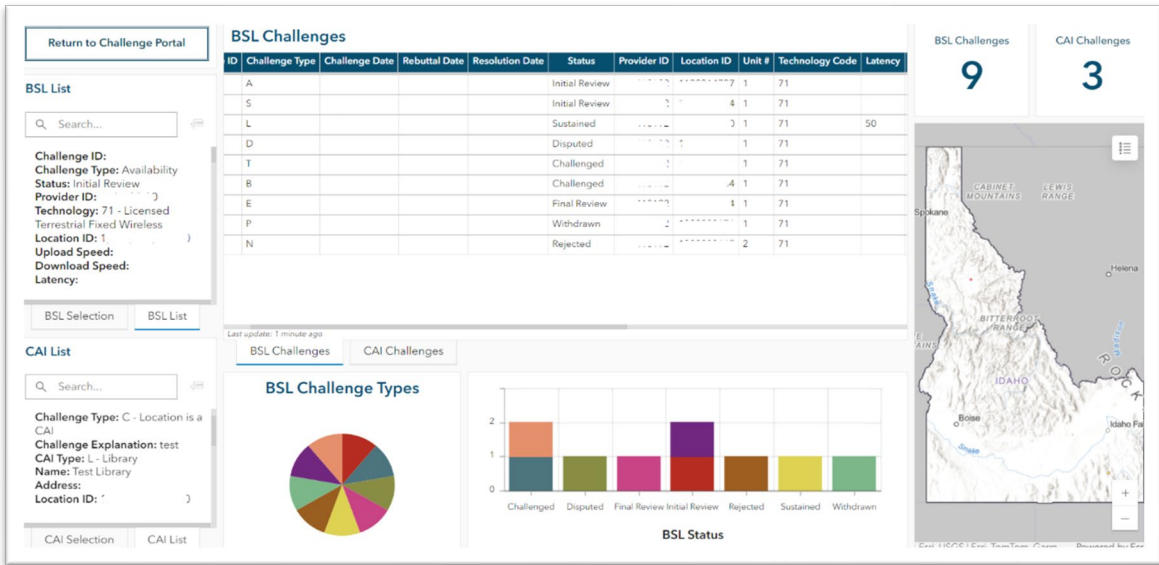
CAI challenge submission form; page 3 of 3

* * *

E. Tracking Challenge Status instructions

The Challenge Dashboard can be accessed through the button on the upper right corner of the Challenge Portal. Within the dashboard, there's a table of challenge information, a detailed list of all challenges, and a tab to show data of selected challenges. The BSL and CAI challenge tables are on separate tabs and have their own detail lists which can be searched by any of the data within. When BSLs from the list are selected, the table is filtered to reflect the same challenges. When a challenge is selected from the table, the BSL Selection card will show the challenge information and the map will move to that location point. The pie chart displays the portion of challenges that are a specific type. The graph chart shows the number of challenges by their status and is color coded to match the challenge type distinction. During the challenge phase, challengers will only be able to view their own challenges. After the challenge phase all challenges will be viewable.

²³ Center for Medicare and Medicaid Services <https://data.cms.gov/provider-characteristics/hospitals-and-other-facilities/provider-of-services-file-hospital-non-hospital-facilities>



BEAD Challenge Dashboard

* * *

F. **Rebuttal submission form** can be found on the Challenge Portal Dashboard in the details panel. BSL and CAI rebuttals are submitted in separate forms, so verify the survey is the correct one by the title at the top.

1. Challenge ID: unique ID for each challenge
2. Location ID: unique identifier for the location from the BSL Fabric
3. Type of Rebuttal: select the type for which the challenge being disputed is labelled.
4. Challenger Identifier: IOB generated text key is (found in the email confirming organization review and account creation). Text key should identify the organization submitting the Rebuttal.
5. Provider ID (if applicable): unique 6-digit code generated by the FCC. Provider ID should identify the organization submitting the Rebuttal.
6. Rebuttal Evidence: documentation supporting the dispute
7. Rebuttal Description: explanation of the rebuttal and in what manner the challenge is incorrect.

Rebuttal submission form

VII. Glossary

Attestation	A declaration that the individual / organization is formally certifying the validity of their claim.
BDC	Broadband Data Collection
BEAD	Broadband Equity, Access and Deployment
BSL	Broadband Serviceable Location: A residential and/or business location recognized in the FCC National Broadband Map at which broadband service is, or can be, installed.
CAI	Community Anchor Institution: Defined by the IOB as an entity such as a school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, public housing organization (including any public housing agency, HUD-assisted housing organization, or tribal housing organization), government facility, or community support organization that facilitate greater use of broadband service by vulnerable populations as defined in the BEAD NOFO ²⁴ .
Eligible	Locations eligible for BEAD funding. In accordance with the BEAD NOFO, locations that are (1) served exclusively by satellite (2) using an entirely unlicensed wireless spectrum (3) served by a technology not specified by the FCC for the National Broadband Map (4) connections with high latency (100ms).
Eligible Challenger	Units of local government, units of tribal government, nonprofit organizations, and broadband service providers.
Eligible Entity	Units identified in the Infrastructure Investment and Jobs Act which are authorized to apply to NTIA for grants under the BEAD Program, the State of Idaho
Ineligible	Locations that are not eligible for BEAD funding, meaning they have or will soon have adequate broadband service available.
IOB	Idaho Office of Broadband
NTIA	National Telecommunications and Information Administration
PII	Personal Identifying Information:
Served	Locations that receive service of greater than 100 Mbps download and 20 Mbps upload speeds were considered served.
Statuses	“Initial Review”: successful submission of a challenge “Challenged”: evidence has been reviewed and meets requirements; challenge

²⁴ <https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf> Section I.C.f, page 11

was accepted for rebuttal or final determination
 “Disputed”: challenge has received a rebuttal
 “Final Review”: rebuttal evidence is being review and determination is pending
 “Sustained”: challenge has been accepted
 “Rejected”: challenge has been denied
 “Withdrawn”: challenge has been removed by challenger

Technology Codes

(10) DSL: digital subscriber line
 (40) Cable modem / hybrid fiber-coaxial
 (50) Fiber-optic
 (71) Licensed Terrestrial Fixed Wireless
 (72) Licensed-by-Rule Terrestrial Fixed Wireless

Unserved

Locations that show service of less than 25 Mbps download and 3 Mbps upload speeds.

Underserved

Locations that show service of less than 100 Mbps download and 20 Mbps upload speeds but greater than 25 Mbps download and 3 Mbps upload speeds. Locations on the National Broadband Map shows to have available qualifying broadband service (i.e., a location that is “served”) delivered via DSL as “underserved” to facilitate the phase-out of legacy copper facilities and ensure the delivery of “future-proof” broadband service.

Vulnerable Populations

Groups that have been challenged with aspects of economic, social, and civic life, including low-income households, aging individuals, incarcerated individuals, veterans, Indigenous and Native American persons, women, persons with disabilities, and persons who live in rural areas.

Any questions or comments concerning the Challenge Process User Guide or the Challenge Portal can be directed to the IOB and GIS teams at broadbandgis@commerce.idaho.gov