Nevada Governor's Office of Science, Innovation and Technology

HIGH SPEED NV

CHALLENGE PROCESS RESOURCE GUIDE

Version 1.0

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Bead Challenge Process Guide

As required by statute, the initial eligibility determinations for funding eligibility under the Broadband Equity Access and Deployment (BEAD) program are based on the Federal Communication Commission's (FCC) National Broadband Map.

The BEAD State Challenge Process is designed to provide stakeholders in Nevada with an opportunity to challenge the eligibility of locations. Based on the process approved by the National Telecommunications and Information Administration (NTIA), challengers can dispute the data from the

National Broadband Map using local data. In Nevada, the Nevada Governor's Office of Science, Innovation and Technology (OSIT) will administer the challenge process.

Questions related to policy or procedural items should be directed to highspeednv@gov.nv.gov. Questions related to technical assistance issues should be directed to nvhelpdesk@ready.net.

Note: Due to ongoing discussions between federal and state partners, the information in this document is subject to update and clarification. Any changes will be announced through official channels and documented in a change log.

Allowable Challenges

What Can be Challenged?

The BEAD Challenge Process is designed to accommodate different categories of challenges to develop a more accurate list of BEAD eligible locations.

There are different challenge types within each category, but generally, challengers can only challenge on the following grounds:

- BEAD eligibility determinations for Broadband Serviceable Locations (BSLs)[1]
- Enforceable commitments for existing BSLs (locations with existing funding)
- Planned or existing service for existing BSLs
- The identification of eligible Community Anchor Institutions (CAIs), as defined in Nevada's Initial Proposal Volume 1
- BEAD eligibility determinations for a Community Anchor Institution (CAI).

Area & MDU Challenges

OSIT will administer both Area Challenges and challenges for Multi-Dwelling Units ("MDUs") based on Availability, Technology, Latency, and Data Cap challenge types. An Area Challenge is triggered if six (6) or more broadband serviceable locations (fn. 1) using a particular technology and a single provider within a census block group[2] are challenged under the same challenge type. An MDU challenge requires challenges for one unit for MDUs having fewer than 15 units, for two units for MDUs of between 16 and 24 units, and at least three units for larger MDUs.

[1] A **Broadband Serviceable Location** is a business or residential location, identified on the FCC National Broadband Map, where fix broadband services exist, or can be installed.

[2] Area Challenge determinations will be determined based on 2020 Census Block Groups

Please note that all Technology Challenges will be recorded as an Availability Challenge under Reason Code 5, as described in Table 1. This means that Technology Challenges will be combined with Availability Challenges for the purposes of triggering Area and MDU Challenges. However, this is based on tentative feedback from NTIA, therefore, it is recommended that all Technology Challenges are submitted under Availability and Reason Code 5.

The provider receiving an Area Challenge or MDU Challenge must demonstrate that they are meeting the availability/technology, latency, and data cap requirement, respectively, for all locations within the area or all units within an MDU. The provider can use any of the permissible rebuttals described in this document for the respective challenge type.

Area Challenges for Availability need to be rebutted with evidence that service is available for all BSLs within the census block group. For wireline providers, this should include network diagrams that show fiber or hybrid-fiber-coax (HFC) infrastructure and/or customer subscribers. For fixed wireless service, the challenge system will offer a representative random sample of the area in contention, but no fewer than [10] locations, where the provider must demonstrate service availability and speed (e.g., with a mobile test unit).[3]

For a Speed Test Area Challenge, the challenged provider will be required to submit a rebuttal for at least 10% of the customers in the challenged area. The customers must be randomly selected. Providers must apply the 80/80 rule, i.e. 80% of these locations must experience a speed that equals or exceeds 80% of the speed threshold. Only speed tests conducted by the provider between the hours of 7 p.m. and 11 p.m. local time will be considered as evidence for a challenge rebuttal.

For a Latency Area Challenge, the challenged provider will be required to submit a rebuttal for at least 10% of the customers in the challenged area. The customers must be randomly selected. Providers must apply the 80/80 rule, i.e. 80% of these locations must experience a latency that does not exceed 80ms.

In the event of a representative random sample being used for a rebuttal, such as with a Latency Area Challenge or a fixed wireless provider, the rebuttals against the original challenged locations will not count toward the minimum number of locations required for the Area Challenge rebuttal.

Who Can Submit a Challenge?

Under the federal policy for the BEAD Program, only the following entities are permitted to submit formal challenges during the BEAD Challenge Process:

[3] A mobile test unit is a testing apparatus that can be easily moved, which simulates the equipment and installation (antenna, antenna mast, subscriber equipment, etc.) that would be used in a typical deployment of fixed wireless access service by the provider.

- Units of Local and Tribal Governments
- Non-profit organizations
- Broadband Providers

Role for Residents, Businesses, and CAIs

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 submitted by the permissible challengers will be gathered directly from residents and/or businesses that have not been provided the level of broadband service that is reportedly available to them. Residents and businesses should work with and submit evidence through an eligible challenger.

Structure and Timing

The BEAD Challenge Process is required to be completed before the state can distribute the funds. This ensures that the list of eligible locations is finalized before the grant application window opens.

Prior to the kickoff of the challenge process, OSIT will post the final eligibility determinations on a public map available through the portal.

The Challenge Process Phases

Timeline	
Challenge Submission Window	February 27, 2024 – March 28, 2024
Rebuttal Submission Window	30 calendar days following the conclusion of the Challenge Submission Window and OSIT's completion of verification that all challenges meet the minimum level of evidence sufficient to establish a challenge
Final Determination	Within about 30 calendar days of the of the conclusion of the Rebuttal Submission Window

Challenge Phase

The Challenge Phase will run for 30 calendar days. During this phase, eligible challengers will be able to submit challenges using the Challenge Portal. After a challenge is submitted, the OSIT team will review the evidence and determine if it meets the evidentiary requirements. If a challenge is determined to meet the minimum level of evidence, it will be considered a "valid challenge".

After all of the challenges have been reviewed, the valid challenges will be processed collectively to determine which challenges require a rebuttal and identify any Area Challenges.

Since the intention of the challenge process is to modify the BEAD eligibility status, rebuttals will only be required for locations where a successful challenge would result in a modification of the eligibility status for the affected location. 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. However, that challenge will still be considered for the purposes of reaching the Area Challenge threshold.

> ***Tip:*** *Submit your challenges early. If there are errors in your submission, you'll be given an opportunity to re-submit, but ONLY until the challenge phase ends. You will not be allowed to fix errors or omissions in your challenge after the 30-day submission window closes.*

Rebuttal Phase

After the Challenge Phase closes and challenges are processed, the Rebuttal Phase will run for 30 calendar days. At the beginning of the Rebuttal Phase, all of the challenges that require a rebuttal will be posted in the Challenge Portal. For challenges directed against providers, only the challenged provider may submit a rebuttal. For other challenge types, Permissible challengers may submit a rebuttal.

Broadband providers will be directly notified via email of any challenges directed against them and provided with the details necessary to respond during the Rebuttal Phase. The challenged provider will have 30 days to agree with the challenge or dispute the challenge. If no rebuttal is filed in the allotted time, the challenge will be sustained.

Units of Local and Tribal governments, 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 30-day period. Unlike the Provider Challenges, other challenge types are still subject to final review and determination by the OSIT team.

After a rebuttal is submitted, the OSIT team will review the evidence and determine if it meets the evidentiary requirements. If a rebuttal submission is determined to meet the minimum level of evidence, it will be considered a "valid rebuttal." At the end of the Rebuttal Phase, all challenges with valid rebuttals submitted will be marked as "disputed" and proceed to the Final Determination Phase.

> ***Tip:*** *Submit your rebuttals early. If there are errors in your submission, you'll be given an opportunity to re-submit, but ONLY until the challenge phase ends. You will not be allowed to fix errors or omissions in your challenge after the 30-day submission window closes.*

Final Determination Phase

Within 30 days of the close of the Rebuttal Phase, the OSIT team will review the evidence for each challenge, including the evidence from any rebuttals, and make a final determination to "sustain" or "reject" each challenge. The reviewers will fully review all information included in each challenge and rebuttal prior to making final determinations.

How to Participate in the Challenge Process

Account Registration

Before a Permissible Challenger can participate in the Challenge Process, they must register for an account in the Challenge Portal, ensuring that only eligible parties submit challenges.

Registration Steps

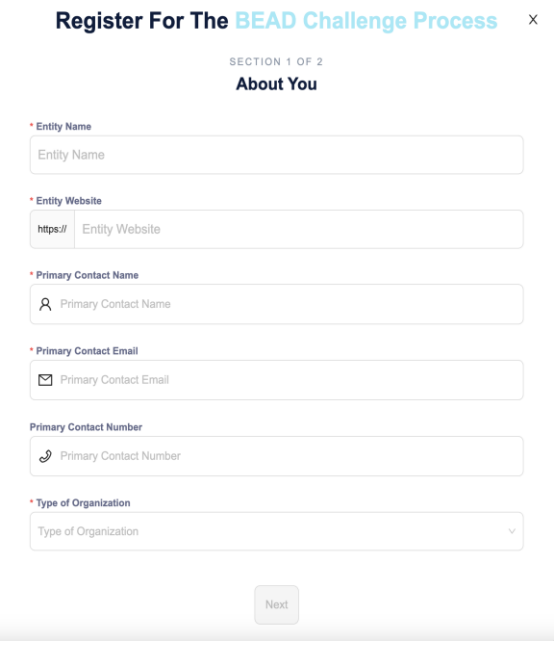
1. **Visit the Registration Page** - The registration page provides a brief overview of the challenge process and helpful links.

2. **Click the Register button** - The Register button will open an intake form to provide the necessary information.

3. **Complete the intake form** - The intake form will ask you for the information needed to verify your account as a permissible challenger.

    a. **General information** - Every registrant for the challenge process will be asked to provide the following information:
        i. Entity Name
        ii. Entity Website
        iii. Primary Contact Name
        iv. Primary Contact Email (Please use domain affiliated with entity)
        v. Primary Contact Phone Number
        vi. Type of Entity (select from dropdown)

    b. **Broadband Providers Information**
        i. Provider Name (select from dropdown)



ii. FCC Registration Number (FRN)
iii. Physical Address
iv. Additional documentation to verify identity

c. **Unit of Local Government Information**
   i. Physical Address
   ii. Additional documentation to verify identity

d. Unit of Tribal Government Information
   i. Unique Entity Identifier (UEI) Number assigned by Sam.gov
   ii. Tribe's name as listed by Bureau of Indian Affairs (BIA)
   iii. Physical Address
   iv. Additional documentation to verify identity

e. Non-Profit Organization Information
   i. Employer Identification Number (EIN)
   ii. Physical Address
   iii. Additional documentation to verify identity

4. **Click "Finish" and submit form** - After you submit the form, you will receive an email confirmation. **You do not need to do anything at this point.**

5. **Wait for Account Approval** - After submitting your account request, each registration will be manually reviewed by OSIT before it is approved. As a result, there will be a slight delay between registration and account setup. If your registration lacks necessary details, you will be notified by email to update your account request with the necessary information.

6. **Complete setting up your account** - Once approved, you will receive an email with a link to complete the setup of your account where you will be asked to set a password.

How to Submit Challenges and Rebuttals

Once your registration has been approved and your account has been set up, you will be able to file challenges and rebuttals while the respective phases are open.

Submitting Challenges

In most cases, all Permissible Challengers are eligible to submit challenges of any type.

Challenge Steps

1. **Log-in to the Challenge Portal -** Users can log-in using an email/password combination or use a "Magic Link" which sends an email to log-in directly without a password.

2. **Expand "Challenge" Item in the Navigation Menu** - There are a range of options in the sidebar navigation menu. When clicking on the Challenge menu item, the sub-menu will expand to display two options: "Dashboard" and "Challenge Map."

3. **Click on either "Dashboard" or "Challenge Map" -** Both options provide different functionality, but each of them will allow you to open a challenge submission window. The Challenge Map provides a geospatial representation of the eligibility designations under BEAD, while the Dashboard allows for review of submitted challenges. If you are a provider, challenges submitted against your reported service will be viewable on your Dashboard.

4. **Click on "Add Challenge" Button** - The "Add Challenge" button is found on the top right of the "Submitted Challenges" panel of the Challenge Map page or on the top-right of the challenges table on the Dashboard page. When you open the 'Create a Challenge' page, you'll find the Challenge Map featuring a challenge flow panel on the right, along with layers that allow you to filter the map based on a range of parameters.

5. **Create a Challenge** - When creating a challenge in the Challenge Portal, there are several steps included in the flow:
    a. **Select Challenge Category and Type -** Each challenge category includes multiple challenge types to select from:
        i. **Planned or Existing Service**
            1. Planned Service
            2. Existing Service
        ii. **Enforceable Commitments**
            1. Covered by Enforceable Commitment
            2. Not Covered by Enforceable Commitment
        iii. **Provider Service Level**
            1. Availability
            2. Speed
            3. Latency
            4. Data Cap
            5. Technology
            6. Business Service Only
        iv. **Anchor Institution Classification**
            1. Location is a CAI
            2. Location is not a CAI
            3. Location Does Not Receive 1 Gbps Service
            4. Location Does Receive 1 Gbps Service

b. Select Challenge Details - After selecting the Challenge Type, the data in the map will be filtered to display only those locations that are eligible for the selected challenge type. For example, if an area is already unserved, you will not be able to file an Availability Challenge. From the locations eligible for the selected challenge type, you will be prompted to provide the challenge details that will further filter the locations, based on the options you select. The required challenge details will vary by challenge type, as is described below.

c. Select Locations – After providing challenge details, only the locations eligible for the challenge type and details provided will be displayed. From the remaining locations, you will be prompted to select the location(s) you want to challenge. You can add locations one-by-one or select a group of locations.

i. Adding individual locations – To add an individual location, click on the location on the map, which will then provide a pop-up of the address of that location and an "Add to Challenge" button. If the address aligns with the location you intend to add to the challenge, click "Add to Challenge". Then click "Confirm" in the following prompt. You can add multiple locations to the same challenge submission using this method.

ii. Add locations in bulk - When filing bulk challenge submissions, rather than selecting locations individually, you can select them as a group. To add multiple locations as a group, there are two methods available.

1. **Shift+Click+Drag cursor -** This method allows you to quickly select multiple locations directly on the map. This is the quickest, but less precise method of selecting multiple locations, because the selection boundaries are in a rectangular shape. Once you have selected locations using this method, you will be prompted to confirm that you want to add these locations to your challenge. The prompt will include the number of locations that you have selected.

2. **Select or Upload Area by creating a "Zone"** - This method allows you to define a zone by drawing a polygon, uploading a shapefile, or selecting from a library, which includes defined geographies such as cities, counties, or Tribal areas. To add a zone, click on the "Zones" tab in the left panel to define a new zone by drawing, uploading a shapefile or selecting from a library of official boundaries.

3. **Removing locations from selection** - If you inadvertently add locations, you can remove them by clicking the "Trash" icon next to the location in the right panel, or remove all of the selected locations by clicking "Remove All."

d. **Upload Evidence and Documentation** - Once you have finalized the location(s) you want to challenge, you will be asked to provide evidence and documentation to support your challenge. For challenges that require separate evidence files per location, you will be prompted to download a .csv file with the selected location.

e. **Attestation** - After evidence has been uploaded, you will be required to complete an attestation confirming that the details of the submission are true, complete, and accurate. Falsification of evidence may subject the affiant to potential civil or administrative penalties.

Submitting Rebuttals

1. **Notification of Rebuttal Phase** - When the Rebuttal Phase opens, notifications will be sent to all registered Permissible Challengers that the challenges are formally open for rebuttal. All Permissible Challengers will be notified of the opportunity to submit rebuttals to open challenges, which includes any challenge not submitted directly against a provider. In addition to the standard notification, the Broadband Providers notification will include a notification of whether challenges were received against them. The formal notice will initiate the 30-day rebuttal window.

2. **Log-in to the Challenge Portal** - Users can log-in using an email/password combination or by using a "Magic Link" which sends an email to log-in directly without a password.

3. **Expand "Challenge" Item in the Navigation Menu** - There are a range of options in the sidebar navigation menu. When clicking on the Challenge Menu item, the sub-menu will expand to display two options: "Dashboard" and "Challenge Map." To view the challenges available for rebuttal, click on "Dashboard."

4. **Go to "Dashboard" -** During the Rebuttal Phase, the Dashboard allows for review of challenges eligible for rebuttal. In the dashboard, there are two tabs for challenge review: "Challenges Received" (Providers Only) and "Open for Rebuttal."

a. **Challenges Received (Providers Only)** - The Challenges Received tab will display the challenges received against your reported service. The challenges will be grouped by

submission and include information such as the challenging entity, challenge type, number of challenged locations, and other details.

b. **Open for Rebuttal** - The Open for Rebuttal tab will display all challenges that are not directed at a specific broadband provider, such as the Planned Service, Enforceable Commitment, or CAI challenges. The challenges will be grouped by submission and include information such as the challenging entity, challenge type, number of challenged locations, and other details.

5. **Click View Details** - To begin the Rebuttal Process, click "View Details" on the challenge that you want to submit a rebuttal against. This will pull up an interface with a map displaying the locations and details on the challenged locations included in the submission. The information on the challenge submission will be available in the right panel, which has two tabs: "Details" and "Locations."
    a. **Details:** The challenge details will be similar to those provided in the Dashboard but will include an expanded description of the challenge type.
    b. **Locations:** The "Locations" tab will provide a full list of challenged locations for the selected submission.

6. **Rebut or Accept Challenges** - Using the "Locations" tab, you can choose the individual location challenges you wish to rebut or accept. If you want to rebut or accept all of the challenges, you can do so by clicking the "Rebut All" or "Accept All" button. Note that accepting challenges is only an option for broadband providers reviewing challenges against them, since they are the only ones eligible to rebut those challenges. Open challenges can be rebutted by multiple entities, so they will remain open for the entire 30-day window.

7. **Upload Evidence and Documentation** - Once you have finalized the location(s) you want to rebut or accept, you will be asked to provide any evidence and documentation you want included in the review of your rebuttal.

8. **Attestation** - After evidence has been uploaded, you will be required to complete attestation confirming that the details of the submission are true, complete, and accurate Falsification of evidence may subject you to potential civil or administrative penalties.

Evidence and Documentation Requirements

The evidence and documentation submission is the most important part of the challenge submission. If your submission does not meet the minimum level of evidence sufficient to establish a valid challenge, it will not be approved to proceed to the rebuttal phase.

The minimum level of evidence required varies by challenge type.

Availability Challenges

The Availability challenge type in the BEAD Challenge Process closely resembles the FCC Challenge Process. It supports challenges that have evidence that the service reported in the map at a specific location is not actually currently available, or cannot deliver service to a location within 10 days, over the reported technology at maximum advertised speeds.

In alignment with the FCC Challenge Process, the BEAD Challenge Process requires the "Reason for the Challenge" to be categorized using the "reason_code" field from the *FCC Broadband Data Collection: Data Specifications for Bulk Fixed Availability Challenge and Crowdsource Data.*[4]

Evidence for Availability Challenges

When filing Availability Challenges, you will be required to select one of the following reasons and provide evidence for each challenge. Table 1 outlines the acceptable evidence for each Reason Code and the maximum allowable age of evidence to be submitted in support of the challenge.

If you choose to provide "Other evidence to support challenge," we cannot ensure that the evidence will meet the minimum requirements. To support our review, please provide a thorough explanation of any evidence classified as "Other".

Table 1

Code	Reason	Acceptable Evidence Types for Challenges	Data Age
1	Provider failed to schedule a service installation within 10 business days of a request.	● Screenshot from provider website ● Email from provider ● Text message or voicemail transcript from provider ● Letter from provider (Physical or PDF) ● Documentation of phone call or in-person interaction ● Other evidence to support challenge	365 days
2	Provider did not install the service at the agreed-upon time.	● Screenshot from provider website ● Email from provider ● Text message or voicemail transcript from provider ● Letter from provider (Physical or PDF) ● Documentation of phone call or in-person interaction ● Other evidence to support challenge	365 days
3	Provider requested more than the standard	● Screenshot from provider website ● Email from provider	365 days

[4] See "Broadband Data Collection: Data Specifications for Bulk Fixed Availability Challenge and Crowdsource Data (Section 3.2)," Federal Communications Commission, January 12, 2023, bdc-bulk-fixed-challenge-dataspecifications.pdf.

	installation fee to connect the location.	• Text message or voicemail transcript from provider • Letter from provider (Physical or PDF) • Documentation of phone call or in-person interaction • Other evidence to support challenge	
4	Provider denied the request for service.	• Screenshot from provider website • Email from provider • Text message or voicemail transcript from provider • Letter from provider (Physical or PDF) • Documentation of phone call or in-person interaction • Other evidence to support challenge	180 days
5	Provider does not offer the technology entered above at this location.	• Screenshot from provider website • Email from provider • Text message or voicemail transcript from provider • Letter from provider (Physical or PDF) • Documentation of phone call or in-person interaction • Terms of Service / Service Description • End-User contract or offer • Infrastructure Knowledge/Evidence, Infrastructure Knowledge/Evidence, including manufacturer and model number of residential gateway • Other evidence to support challenge	365 days
6	Provider does not offer the speed(s) shown on the Broadband Map for purchase at this location.	• Screenshot from provider website • Email from provider • Text message or voicemail transcript from provider • Letter from provider (Physical or PDF) • Documentation of phone call or in-person interaction • Terms of Service / Service Description • End-User contract or offer • Infrastructure Knowledge/Evidence • Other evidence to support challenge	180 days
7	Intentionally Omitted[5] (Does not constitute a formal challenge)	N/A	N/A

[5] The Availability challenge does not adjudicate whether the actual speeds of the service falls below the advertised speeds. The FCC uses Code 7 is used for consumer complaints when "Subscribed Speed Not Achievable"

8	No wireless signal is available at this location (only for technology codes 70 and above).	• Screenshot from provider website • Email from provider • Text message or voicemail transcript from provider • Letter from provider (Physical or PDF) • Documentation of phone call or in-person interaction • Infrastructure Knowledge/Evidence • Other evidence to support challenge	365 days
9	New, non-standard equipment had to be constructed at this location.	• Screenshot from provider website • Email from provider • Text message or voicemail transcript from provider • Letter from provider (Physical or PDF) • Documentation of phone call or in-person interaction • Infrastructure Knowledge/Evidence • Other evidence to support challenge	365 days

Evidence for Availability Rebuttals

Only the challenged provider may submit a rebuttal to a Latency Challenge. This evidence must include evidence that counters the Reason Code and evidence provided by the challenger. The acceptable forms of evidence are provided in Table 2.

Table 2

Code	Reason	Acceptable Evidence Types for Rebuttals
1	Provider failed to schedule a service installation within 10 business days of a request.	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 showing service availability. Provider provides a copy of an offer sent to the location for the service at the speeds shown on the Broadband Map.
2	Provider did not install the service at the agreed-upon time.	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 showing service availability. Provider provides a copy of an offer sent to the location for the service at the speeds shown on the Broadband Map.
3	Provider requested more than the standard installation fee to connect the location.	Provider submits evidence that service is now available as a standard installation, e.g., via a copy of an offer sent to the location.
4	Provider denied the request for 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 showing service availability. Provider provides a copy of an offer sent to the location for the service at the speeds shown on the Broadband Map.
5	Provider does not offer the technology entered above at this location.	Provider has countervailing evidence from their network management system showing an appropriate residential gateway that matches the provided service.
6	Provider does not offer the speed(s) shown on the Broadband Map for purchase at this location.	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 showing service availability. Provider provides a copy of an offer sent to the location for the service at the speeds shown on the Broadband Map.
7	Intentionally Omitted[6] (Does not constitute a formal challenge)	N/A
8	No wireless signal is available at this location (only for technology codes 70 and above).	Provider has countervailing evidence to demonstrate service availability and speed (e.g., with a mobile test unit).

[6] The Availability Challenge does not adjudicate whether the actual speeds of the service falls below the advertised speeds. The FCC uses Code 7 is used for consumer complaints when "Subscribed Speed Not Achievable."

9	New, non-standard equipment had to be constructed at this location.	Provider submits evidence that service is now available as a standard installation, e.g., via a copy of an offer sent to the location.

Additional Provider Service Level Challenges

In addition to the Availability Challenge type in the BEAD Challenge Process, there are four allowable Provider Service Level Challenge Types: Speed, Latency, Data Cap, Technology, and Business Service Only.

Evidence for Additional Provider Service Level Challenges

The Latency Challenge has specific requirements that differ from the rest, as described below in the "Evidence for Latency Challenges" section. However, the Data Cap, Technology, and Business Service Only Challenge requirements are similar to those of Availability challenges. Table 3 outlines the acceptable evidence for each of these challenge types and the allowable maximum age of evidence to be submitted in support of the challenge.

If you choose to provide "Other evidence to support challenge," we cannot ensure that the evidence will meet the minimum requirements. To support our review, please provide a thorough explanation of any evidence classified as "Other".

Table 3

Type	Reason	Acceptable Evidence Types for Challenges	Data Age
Data Cap	The only service plans marketed to consumers impose an unreasonable capacity allowance ("data cap") on the consumer.	● Screenshot from provider website ● Email from provider ● Text message or voicemail transcript from provider ● Letter from provider (Physical or PDF) ● Documentation of phone call or in-person interaction ● Terms of Service / Service Description ● End-User contract or offer ● Other evidence to support challenge	180 days
Technology	Provider does not offer the technology	● Screenshot from provider website ● Email from provider	365 days

	entered above at this location (The technology indicated for this location is incorrect.)	• Text message or voicemail transcript from provider • Letter from provider (Physical or PDF) • Documentation of phone call or in-person interaction • Terms of Service / Service Description • End-User contract or offer • Infrastructure Knowledge/Evidence, including manufacturer and model number of residential gateway • Other evidence to support challenge	
Business Service Only	The location is residential, but the service offered is marketed or available only to businesses.	• Screenshot from provider website • Email from provider • Text message or voicemail transcript from provider • Letter from provider (Physical or PDF) • Documentation of phone call or in-person interaction • Terms of Service / Service Description • End-User contract or offer • Other evidence to support challenge	180 days

Evidence for Additional Provider Service Level Rebuttals

Only the challenged provider may submit a rebuttal to a Latency Challenge. The rebuttal must include evidence that counters the Reason Code and evidence provided by the challenger. The acceptable forms of evidence are provided in Table 4.

Table 4

Type	Reason	Acceptable Evidence Types for Rebuttals
Data Cap	The only service plans marketed to consumers impose an unreasonable capacity allowance ("data cap") on the consumer.	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
Technology	Provider does not offer the technology entered above at this location (The technology indicated for this location is incorrect.)	Provider has countervailing evidence from their network management system showing an appropriate residential gateway that matches the provided service.

Business Service Only	The location is residential, but the service offered is marketed or available only to businesses.	Provider has documentation that the service listed in the BDC is available at the location and is marketed to residential customers.

Evidence for Speed Challenges and Rebuttals

OSIT will accept speed tests as evidence for substantiating challenges and rebuttals. Each speed test consists of three measurements, taken on different days. Speed tests cannot predate the beginning of the challenge period by more than 60 days. Speed tests can take four forms:

- A reading of the physical line speed provided by the residential gateway, (i.e., DSL modem, cable modem (for HFC), ONT (for FTTH), or fixed wireless subscriber module.
- A reading of the speed test available from within the residential gateway web interface.
- A reading of the speed test found on the service provider's web page.
- A speed test performed on a laptop or desktop computer within immediate proximity of the residential gateway.

Each speed test measurement must include:

1. The time and date the speed test was conducted.
2. The provider-assigned Internet Protocol (IP) address, either version 4 or version 6, identifying the residential gateway conducting the test.

Each group of three speed tests must include:

1. The name and street address of the customer conducting the speed test.
2. A certification of the speed tier the customer subscribes to (e.g., a copy of the customer's last invoice).
3. An agreement, using an online form provided by the Eligible Entity, that grants access to these information elements to the Eligible Entity, any contractors supporting the challenge process, and the service provider.

The IP address and the subscriber's name, and street address are considered personally identifiable information (PII) and thus are not disclosed to the public (e.g., as part of a challenge dashboard or open data portal).

Each location must conduct three (3) speed tests on three (3) different days; the days do not have to be adjacent. The median of the three tests (i.e., the second highest (or lowest) speed) is used to trigger a Speed-Based (S) Challenge, for either upload or download. For example, if a location claims a broadband speed of 100 Mbps/25 Mbps and the three speed tests result in download speed measurements of 105, 102 and 98 Mbps, and three upload speed measurements of 18, 26 and 17 Mbps, the speed tests qualify the location for a challenge, because the measured upload speed marks the location as underserved.

Speed tests may be conducted by subscribers, but speed test challenges must be gathered and submitted by units of local government, nonprofit organizations, or a broadband service provider.

Subscribers submitting a speed test must indicate the speed tier they are subscribing to. If the household subscribes to a speed tier of between 25/3 Mbps and 100/20 Mbps and the speed test results in a speed below 25/3 Mbps, this broadband service will not be considered to determine the status of the location. If the household subscribes to a speed tier of 100/20 Mbps or higher and the speed test yields a speed below 100/20 Mbps, this service offering will not count towards the location being considered served or underserved. However, even if a particular service offering is not meeting the speed threshold, the eligibility status of the location may not change. For example, if a location is served by 100 Mbps licensed fixed wireless and 500 Mbps fiber, conducting a speed test on the fixed wireless network that shows an effective speed of 70 Mbps does not change the status of the location from served to underserved.
A service provider may rebut an area speed test challenge by providing speed tests, in the manner described above, for at least 10% of the customers in the challenged area. The customers must be randomly selected. Providers must apply the 80/80 rule, i.e., 80% of these locations must experience a speed that equals or exceeds 80% of the speed threshold. For example, 80% of these locations must have a download speed of at least 20 Mbps (that is, 80% of 25 Mbps) and an upload speed of at least 2.4 Mbps to meet the 25/3 Mbps threshold and must have a download speed of at least 80 Mbps and an upload speed of 16 Mbps to be meet the 100/20 Mbps speed tier. Only speed tests conducted by the provider between the hours of 7 p.m. and 11 p.m. local time will be considered as evidence for a challenge rebuttal.

Evidence for Latency Challenges

Latency Challenges must provide evidence that the round-trip latency of the broadband service exceeds 100ms. This will require multiple speed tests by the subscriber at each challenged location, showing the excessive round-trip latency.

Each Latency Challenge must consist of three measurements, taken on different days. The measurements do not need to occur on consecutive days. The median of the three tests is used to trigger the challenge.

Each group of three speed tests must include:

- The name and street address of the customer conducting the speed test.
- The challenge process, and the service provider.
- The time and date each speed test was conducted.
- The provider-assigned internet protocol (IP) address identifying the residential gateway conducting the test.

- An attestation from the challenger that consent was obtained by the named customer to grant access to these information elements to OSIT and any contractors supporting the challenge process.
- A certification of the speed tier the customer subscribes to (e.g., a copy of the customer's last invoice).

The IP address and the subscriber's name are considered personally identifiable information (PII) and thus are not disclosed to the public (e.g., as part of a challenge dashboard or open data portal).

To be considered valid, the speed tests must be performed using one of the following options:

1. A reading of the physical line speed provided by the residential gateway, e.g. DSL modem, cable modem, ONT, or fixed wireless subscriber module.
2. A reading of the speed test available from within the residential gateway web interface.
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 a commonly used speed test application, such as those provided by Ookla or Measurement Lab.

Evidence for Latency Rebuttals

Only the challenged provider may submit a rebuttal to a Latency Challenge. This evidence must include countervailing speed tests showing latency at or below 100 ms, e.g., from their own network management system or the CAF performance measurements.

Speed tests must consist of three (3) measurements, taken on different days. The measurements do not need to occur on consecutive days, but must be conducted between the hours of 7p.m. and 11p.m. local time to be considered as evidence for a challenge rebuttal. The median of the three tests is used as the rebuttal to the challenge.

Each measurement must include the following details:

- The time and date each speed test was conducted
- The provider-assigned internet protocol (IP) address identifying the residential gateway where the test is conducted.

If an Area Challenge is triggered for a Latency Challenge, the provided rebuttal for at least 10% of the customers in the challenged area. The customers must be randomly selected. Providers must apply the 80/80 rule, i.e. 80% of these locations must experience a latency that does not exceed 80ms.

Enforceable Commitment Challenges

In preparation for the deployment of the BEAD program, OSIT is required to identify every location where an "Enforceable Commitment" exists to deploy qualifying broadband service at or above 100/20 Mbps, regardless of the current service available at the funded locations. This includes identifying the broadband serviceable locations served by federal and state funding programs.

Evidence for Enforceable Commitment Challenges

The Enforceable Commitment Challenge allows Permissible Challengers to provide evidence that unserved or underserved locations have existing federal, state, or local funding that would make the locations ineligible for BEAD.

The following details and evidence will be required:

1. Obligation Deployment Download Speed in Mbps
2. Obligation Deployment Upload Speed in Mbps
3. Obligation Deployment Technology
4. An attestation to confirm that the round-trip latency of deployed service will be under 100ms.
5. An attestation to confirm that the network will be fully deployed to the challenged locations by the dates required by the award.
6. Whether the deployed service be available as residential service, business service, or both.
7. Evidence should include:
    a. Evidence of award such as authorization letter and executed agreement with funding entity
    b. List of funded locations included in the award.
    c. If available, methodology used to match awarded locations to Fabric IDs.
    d. If any locations included in the award are on Tribal Lands, a legally binding agreement with Tribal Government, certified by Tribal Resolutions must be attached.

Evidence for Enforceable Commitment Rebuttals

Permissible Challengers may file a rebuttal to an Enforceable Commitment Challenge if they have documentation that the provider has defaulted on the commitment, is 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.

Enforceable Commitment Identification - Process and Methodology

OSIT has deduplicated the list of BEAD-eligible locations, based on existing funding from current programs, using the following process:

Federally Administered Grant Programs

OSIT used the BEAD Eligible Entity Planning Toolkit to identify existing federally Enforceable Commitments, which includes data on funding from the following programs (not all applicable to Nevada):

- NTIA Broadband Infrastructure Program (BIP)
- NTIA Tribal Broadband Connectivity Program (TBCP)
- FCC Rural Digital Opportunity Fund (RDOF)
- FCC Connect America Fund II (CAFII)
- USDA Rural eConnectivity Broadband Loan and Grant Program (ReConnect)
- US Treasury State Fiscal Recovery Fund
- US Treasury Capital Projects Fund
- FCC E-Rate
- FCC Rural Healthcare Program
- State Funding - High Speed NV Initiative

OSIT is aware that the FCC adopted rules for the Enhanced Alternative Connect America Model (A-CAM), allowing providers to participate in the extension of the program and deploy at speeds of 100/20 Mbps or greater. As of the publication of Version 1.0 of this guide, the FCC has not confirmed the locations funded by Enhanced A-CAM. However, an additional deduplication process will be run following the Challenge Process. This second round of deduplication will occur no sooner than the conclusion of the Final Review phase of the Challenge Process. **If you are a provider electing to participate in Enhanced A-CAM, we encourage you to notify OSIT proactively.**

Evidence for Not Part of an Enforceable Commitment Rebuttals

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

The rebuttal must produce evidence that counters the challenge and may include the following:

- Evidence that the 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
- A Tribal Council Resolution or requisite legally binding agreement with the Tribal Government supporting the Enforceable Commitment

Planned or Existing Service Challenges

If a provider has deployed service or will deploy service that will be available by June 30, 2024, they can file a "Planned or Existing Service Challenge."

Evidence for Planned Service Challenges

If you have begun building out broadband service to unserved and/or underserved locations, you may challenge under the "Planned Service" subtype and provide evidence that service will be available to the locations by June 30, 2024.

The information and evidence required for this challenge type includes:

1. Maximum Advertised Download Speed in Mbps
2. Maximum Advertised Upload Speed in Mbps
3. Technology Type of Service
4. Confirmation that the Round-Trip Latency will not exceed 100ms
5. An attestation to confirm that service will be deployed to the locations included in this challenge by June 30, 2024 with the technology, speeds, and latency provided
6. The planned deployment, including the listed speeds, latency, and technology will be deployed to the selected locations by June 30, 2024
7. Evidence that the deployment is on track to be completed on time, which should at least include:
    a. Planned network diagrams
    b. Evidence of all necessary permits that were obtained
    c. Inspection results
    d. Construction contracts and invoices
    e. You are also encouraged to submit other evidence that may demonstrate that the deployment is in progress

For a "Planned Service Challenge" to be successful, you will be required to enter into a binding agreement with OSIT verifying that the service will be deployed and available as documented in the challenge. Additional guidance will be provided on a case-by-case basis by OSIT.

Evidence for Planned Service Rebuttals

Permissible Challengers may submit a "Planned Service Rebuttal". The rebuttal must include countering evidence that demonstrates that the planned service cannot be deployed by June 30, 2024.

It is anticipated that most Planned Service challenge 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.

Evidence for Existing Service Challenges

If you have completed broadband deployment to locations currently designated as unserved and/or underserved, you may challenge under the "Existing Service" subtype and provide evidence that your service is currently available.

The information and evidence required for this challenge type includes:

1. Maximum Advertised Download Speed in Mbps
2. Maximum Advertised Upload Speed in Mbps
3. Technology Type of Service
4. Confirmation that the Round-Trip Latency does not exceed 100ms
5. Indicate if you have already reported the available broadband service to FCC's Broadband Data Collection Program (BDC).
    1. If yes, you will need to confirm which BDC filing window you filed the service under
    2. If no, you will need to attest that the service availability will be reported to the FCC during the next BDC filing window
6. Evidence the service is deployed and available (as many of the following as possible):
    1. Submitted BDC filing (if applicable)
    2. Evidence of subscribers
    3. Network diagram of deployments
    4. Evidence of completed deployment, such as evidence of all necessary permits that were obtained, inspection results, or construction contracts and invoices

Evidence for Existing Service Rebuttals

Permissible Challengers may submit a rebuttal for an "Existing Service Challenge". The rebuttal must include countering evidence that demonstrates that the claimed service is not available.

The evidence may include the allowable evidence from Tables 1 and 2, but may also include evidence such as a failure to pass inspection or other evidence that demonstrates that the provider is unable to deliver service to BSLs as claimed.

CAI Challenges

There are two categories of Community Anchor Institutions (CAI) challenges, including:

- Identification of CAIs
- Eligibility based on broadband need

The identification of CAIs for the purposes of BEAD is based on the definition and process outlined in Section 1.3 of OSIT's Initial Proposal Vol. 1, which includes:

- **Schools:** K-12 schools include all K-12 schools participating in the FCC E-Rate program or that have an NCES (National Center for Education Statistics) ID in the categories "public schools" or "private schools".
- **Libraries:** Including all libraries participating in the FCC E-Rate program as well as all member libraries, and their branches, of the American Library Association (ALA).
- **Health clinic, health center, hospital, or other medical providers:** The list of health clinics, health centers, hospitals and other medical providers includes all institutions that have a Centers for Medicare and Medicaid Services (CMS) identifier.
- **Public safety:** The list includes entities such as fire houses, emergency medical service stations, police stations, and public safety answering points (PSAP), based on records maintained by the Eligible Entity and units of local government.
- **Institutions of higher education:** Institutions of higher education include all institutions that have an NCES ID in the category "college", including junior colleges, community colleges, other universities, or other educational institutions.
- **Public housing organizations:** Public housing organizations were identified by contacting the Public Housing Agencies (PHAs) for the state or territory enumerated by the U.S. Department of Housing and Urban Development. The nonprofit organizations Public and Affordable Housing Research Corporation (PAHRC) and National Low-Income Housing Coalition maintain a database of nationwide public housing units at the National Housing Preservation Database (NHPD).
- **Community support organizations:** The Eligible Entity included any organizations that facilitate greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals. OSIT included senior centers job training centers, and State and Local government facilities that facilitate greater use of broadband by vulnerable populations in this category. Government facilities perform critical public services that in recent years have migrated online, including education, workforce and job training, enrollment and distribution of public benefits such as healthcare, telemedicine, family and child, food and nutrition assistance, unemployment insurance, vehicle and driving services, public safety, and enrollment in ACP. When government facilities have sufficient connectivity, they facilitate the use of broadband services by vulnerable populations to receive the public services they need while also providing services like public Wi-Fi and access to computers. Note, OSIT only includes government facilities that facilitate broadband by vulnerable populations, such as education, workforce and job training, enrollment and distribution of public benefits such as healthcare, telemedicine, family and child, food and nutrition assistance, unemployment insurance, vehicle and driving services, public safety, and other related facilities and does not include government facilities such as water treatment facilities or maintenance facilities that do not facilitate broadband by vulnerable populations.

Identification of CAI

All Permissible Challengers can challenge the designation of the location as a CAI, based on the categories described above.

Evidence for Location is a CAI Challenge

If you believe that a location is incorrectly identified as a non-CAI, you may challenge to have that location included as a CAI. To submit a successful challenge, you will need to submit the following information and evidence:

1. Official entity name of the institution
2. The type of CAI, selecting from the categories defined above.
    1. Depending on the entity type, you will be asked to provide different types of identification numbers, e.g. CMS Certification Number (CCN) for hospitals.
    2. If the CAI is a community support organization, an explanation of how the organization facilitates greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals.
3. Evidence to support the challenge, which may include:
    1. Registration documents
    2. Contact information
    3. Other evidence that demonstrates that the organization meets the requirements of the selected category of CAI.

When challenging to add a location as a CAI, you will be given an opportunity to indicate whether the institution has an unmet broadband need based on the standard of 1000/1000 Mbps.

Evidence for Location is a CAI Rebuttal

Permissible Challengers may submit a rebuttal for a "Location is a CAI Challenge". The information and evidence must include:

1. Identify the basis for the challenge that claims the locations is not a CAI
    1. Location is a residence
    2. Location is a non-CAI business
    3. Institution does not fall under a listed category
        1. Identify the institution type that the location should be listed as
    4. CAI has ceased operations
        1. Date CAI ceased operations
2. Evidence to support rebuttal

Evidence for a Location is a Not CAI Challenge

If you believe that a location is incorrectly identified as a CAI, you may file a challenge to have that location removed from the list. Please note that OSIT is not allowed to add Broadband Serviceable Locations (BSLs) to the map, so a successful challenge will remove this location from BEAD eligibility altogether.

To submit a successful challenge, you will need to submit the following information and evidence:

1. Identify the basis for the challenge that claims the locations is not a CAI
    1. Location is a residence
    2. Location is a non-CAI business
    3. Institution does not fall under a listed category
        1. Identify the institution type that the location should be listed as
    4. CAI has ceased operations
        1. Date CAI ceased operations
        2. Is there another CAI currently operating at this location? If so, provide the following information:
            1. Official entity name of the institution
            2. The type of CAI, selecting from the categories defined above
                a. Depending on the entity type, you will be asked to provide different types of identification numbers, e.g. CMS Certification Number (CCN) for hospitals.
                b. If the CAI is a community support organization, an explanation of how the organization facilitates greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals.
                c. Other evidence that demonstrates that the organization meets the requirements of the selected category of CAI.
2. Evidence that demonstrates that the location is a non-CAI or is no longer in operation.

Evidence for a Location is a Not CAI Rebuttal

Permissible challengers may submit a rebuttal for a "Location is a CAI Challenge". The information and evidence must include evidence that the location falls within the definitions of a CAI as determined by the eligible entity.

CAI BEAD Eligibility based on Broadband Need

Evidence for CAI Does Not Receive 1 Gbps Service Challenge

If a CAI is reported to have 1 Gbps service, but you possess countering evidence, you may file a "CAI Does Not Receive 1 Gbps Service" Challenge. To submit this challenge type, you must provide the following information and evidence:

1. Attest that this location does not currently receive 1 Gbps/1Gbps broadband service and does not have a connection that is readily scalable to 1 Gbps speeds at a higher tier of service over the existing infrastructure.

2. If there is an available internet connection at the location, you'll be asked to provide the following information:
    1. Who is the current provider?
    2. What technology is delivering the current services?
    3. What are the speeds of your current plan?
3. Upload evidence of a recent bill/invoice, photo of the provider gateway, or other evidence to support the challenge.
4. Signed attestation or upload evidence.

Evidence for a CAI Does Not Receive 1 Gbps Service Rebuttal

Permissible challengers may submit a rebuttal to a "CAI Does Not Receive 1 Gbps Service Challenge". The rebuttal must include evidence that the CAI has an existing connection capable of delivering 1 Gbps symmetrical speeds or a connection that is readily scalable to 1 Gbps symmetrical speeds at a higher tier of service over the existing infrastructure.

Evidence for CAI Does Receive 1 Gbps Service Challenge

If a CAI is reported not to have 1 Gbps service, but you possess countering evidence, you may file a "CAI Does Receive 1 Gbps Service" Challenge. To submit this challenge type, you must provide the following information and evidence:

1. Your confirmation that selected CAI(s) have an existing connection capable of delivering 1 Gbps symmetrical speeds or a connection that is readily scalable to these speeds at a higher tier of service over the existing infrastructure.
2. (Optional) If available please provide the following information:
    1. The current provider (do not use dropdown of providers, as it may not include the network delivering enterprise ISPs).
    2. Technology delivering current services (dropdown from the technologies used in other challenges).
    3. Current plan speeds.
3. Upload evidence of recent bill/invoice, photo of the provider gateway, or other evidence to support the challenge.
4. Signed attestation of uploaded evidence.

Evidence for CAI Does Receive 1 Gbps Service Rebuttal

Permissible challengers may submit a rebuttal for a CAI Does Receive 1 Gbps Service. The information and evidence must include evidence that the CAI Location does not have an existing connection capable of delivering 1 Gbps/1Gbps speeds or a connection that is readily scalable 1 Gbps symmetrical speeds at a higher tier of service over the existing infrastructure.

Cellular Fixed Wireless Requirements

OSIT will treat as "underserved" locations that the National Broadband Map shows to have available qualifying broadband service (i.e., a location that is "served") due solely to the availability of Cellular Fixed Wireless Access (CFWA) as "underserved." The broadband office has determined that this modification, and the corresponding rebuttal opportunity, will assist the office in determining the availability of networks with sufficient capacity to meet the expected consumer demand for qualifying broadband in the relevant area. OSIT has determined that this pre-challenge modification affects approximately 1,015 locations based on location data from the November 7, 2023 version of the FCC National Broadband Map. The affected CFWA provider will have an opportunity to rebut this modification.

To successfully rebut this modification, the cellular fixed wireless provider must demonstrate both of the following:

1. Is providing 100/20 Mbps or better service at the relevant locations. The method for rebuttal for this challenge mirrors the procedure described in "Speed Test Requirements" above.

AND

2. The Provider has sufficient network capacity to simultaneously serve (i.e., as concurrently active subscribers) at least 80% of claimed locations in the relevant coverage areas. As one option for making such a showing, a provider may describe how many fixed locations it serves from each cell tower and the amount of per-user averaged bandwidth it uses for capacity planning. To provide confidence to Nevada that a cellular network is likely to be able to support a reasonable fraction of BSLs in the claimed coverage area, a simpler, approximate analysis will be offered as an evidentiary rebuttal method. The provider must indicate the spectrum available to fixed wireless customers (which may be less than that available to mobile devices) for each tower. A minimum capacity demand of 5 Mbps per BSL is required to be considered served only because of cellular fixed wireless service by the provider, with a spectral efficiency of 10 b/s/Hz. Thus, the rebuttal is successful only if the total capacity of all sectors of a cell tower exceeds the number of claimed BSLs dependent on cellular fixed wireless, multiplied by 5 Mbps.

Obtaining CostQuest BSL Fabric Licenses

In order to administer the BEAD program, OSIT is required to use the FCC National Broadband Map as the baseline, which provides reported broadband availability data at the location level and relies on a proprietary dataset to provide the location data.

OSIT was required to enter into a license agreement with CostQuest Associates, the owner of the dataset, to access the data for the purposes of the BEAD program including the challenge process. The

terms of this license agreement restrict OSIT from making the data fully available to stakeholders participating in the challenge process.

While OSIT cannot make the data fully available to stakeholders, the participants in the challenge process are eligible to apply for their own licenses with CostQuest. The NTIA entered into a contract with CostQuest to cover the cost of these licenses, so there is no expense to the licensees.

A CostQuest License is not required to file challenges directly through the challenge portal. However, if you are considering submitting bulk challenges (challenges to more than one location in the same submission), we highly recommend that you obtain a license from CostQuest, which will allow us to provide a bulk challenge template pre-populated with Location IDs that you select.

License Tiers

There are two tiers of licenses relevant for the BEAD Program:

- **Tier D License** - The 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 -** The Tier E license is intended for units of local government, non-profits, and other organizations that have signed an FCC Tier 4 license.
  Request License