

# TEXAS BEAD CHALLENGE PROCESS RESOURCE GUIDE

Version 1.0

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# BEAD Challenge Process Guide

As required by legislation, the initial 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 Texas with an opportunity to participate in the process of challenging the eligibility of locations for BEAD funding. Based on the process approved by the National Telecommunications and Information Administration (NTIA), challengers can dispute the data sourced from the National Broadband Map by using relevant and allowable evidence.

Questions related to policy or procedural items should be directed to [broadband@cpa.texas.gov](mailto:broadband@cpa.texas.gov).

Questions related to technical assistance issues should be directed to [TXhelpdesk@ready.net](mailto:TXhelpdesk@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.

# Acronyms & Definitions

Acronym	Definitions
A-CAM	Alternative Connect America Cost Model
BDC	Broadband Data Collection
BDO	Broadband Development Office
BEAD	Broadband Equity Access and Deployment
BIP	Broadband Infrastructure Program
BSL	Broadband Serviceable Location
CAFII	Connect America Fund - Phase II
CAI	Community Anchor Institution
CCGP	Community Connect Grant Program
CCN	CMS (see below) Certification Number - a unique identifier used for Medicare program facilities
CMS	Centers for Medicare & Medicaid Services
DSL	Digital Subscriber Line
FCC	Federal Communications Commission
FTTH	Fiber to the home
Gbps	Gigabits per second
HFC	Hybrid Fiber Coax
Mbps	Megabits per second
MS	Milliseconds
NCES	National Center for Education Statistics
NTIA	National Telecommunications and Information Administration
ONT	Optical Network Terminal
PII	Personally Identifiable Information
PSAP	Public Safety Answering Point
RDOF	Rural Digital Opportunity Fund
SLFRF	Coronavirus State and Local Fiscal Recovery Funds
TBCP	Tribal Broadband Connectivity Program
TLP	Telephone Loan Program
USDA	United States Department of Agriculture

# Eligible Challengers

## Who can submit a challenge?

Under the federal policy for the BEAD Program, only the following entities are eligible to submit formal challenges or rebuttals during the BEAD challenge process:<sup>1</sup>

- Units of local government.
- Units of tribal governments.
- Nonprofit organizations.
- Broadband providers.

## Role for Residents, Businesses and Community Anchor Institutions (CAIs)

While residents and businesses who are not broadband providers are not allowed to submit challenges directly to the state, they are an essential part of the challenge process. For many types of BEAD eligibility determination 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. Accordingly, successful participation in the submission of BEAD eligibility determination challenges may require coordination between residents and businesses with permissible challengers.

# Allowable Challenges

## What Can Be Challenged?

The BEAD challenge process is designed to accommodate two broad classes of challenges that are necessary to develop a more accurate list of BEAD-eligible locations:

1. Challenges claiming that BEAD-ineligible Broadband Serviceable Locations (BSLs) and Community Anchor Institutions (CAIs) should be considered eligible.
2. Challenges claiming that BEAD-eligible BSLs and CAIs should be considered ineligible.

For the first class of challenges, eligible challengers can provide evidence demonstrating that the internet service at a particular BSL or CAI is inadequate, thereby justifying its eligibility for BEAD. For the second class, eligible challengers can present evidence showing that a BSL should be classified as BEAD-ineligible either because the location currently has qualifying broadband service or because of planned service improvements.

Within each category of challenges, there are specific grounds on which eligible challengers can base their claims:

1. Challenges claiming that BEAD-ineligible BSLs and CAIs should be deemed eligible:

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<sup>1</sup> Eligible challengers are defined in NTIA Challenge Process Policy Notice as “permissible challengers.”

- a. Challenges to the reported availability, data cap, technology and residential/business service included in the FCC’s National Broadband Map<sup>2</sup> for the BSL (or CAI, as applicable)
  - b. Challenges to BSLs not part of enforceable commitments
  - c. Challenges asserting that a location should be classified as a CAI, as defined in Texas’ Initial Proposal Volume 1, or as BEAD ineligible
2. Challenges claiming that BEAD-eligible BSLs and CAIs should be deemed ineligible:
- a. Challenges asserting enforceable commitments for existing BSLs (locations with existing local, state, and/or federal funding)
  - b. Challenges asserting planned, escalating or existing service for existing BSLs
  - c. Challenges asserting that a location should not be classified as a CAI, or as a BEAD ineligible CAI

## Structure and Timing

The BEAD challenge process must be completed before the state can distribute funds for the program. This ensures the list of eligible locations is finalized before the grant application window opens.

Prior to starting the challenge process, the Texas Broadband Development Office (BDO) will post the eligibility determinations on a public map and make them available through the challenge portal. The challenge portal is web-based software tool designed to help facilitate the coordination of the challenge process for all stakeholders. Access to the portal will be made available to all eligible challengers through a registration website. Upon acceptance of your registration request, you will provide login credentials via email. Additional information on the registration process can be found in this guide.

## The Challenge Process Phases

### Timeline

Challenge Submission Window	December 3, 2024 – December 17, 2024
Rebuttal Submission Window	January 10, 2025 – January 24, 2025
Final Determination	February 17, 2025 – February 24, 2025

## Challenge Phase

The challenge phase will run for 14 calendar days. During this phase, eligible challengers can submit challenges using the challenge portal. After a challenge is submitted, the BDO 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.”

<sup>2</sup> The BDO will use Version 5 of the BSL Fabric and Nov. 15, 2024, of the FCC National Broadband Map Availability Data.

After challenges have been reviewed, the valid challenges will be processed collectively to determine which challenges require a rebuttal.

While the primary goal of the challenge process is to adjust the BEAD eligibility status of locations, rebuttals will be necessary in two scenarios:

1. When a successful challenge would alter the eligibility status of the challenged location.
2. When a successful challenge would not alter the eligibility status of the challenged location.

**Examples:**

**Scenario 1:**

- If a single provider reports coverage at 100/20 Mbps and that provider is challenged, the challenged provider will have the opportunity to submit a rebuttal for that location. Here, a successful challenge could change the location’s eligibility status.

**Scenario 2:**

- If two providers report coverage at 100/20 Mbps and only one of those providers is challenged, the challenged provider will still have the opportunity to submit a rebuttal for that location. In this case, even if the challenge is successful, the location’s eligibility status would remain unchanged due to the presence of the second provider.

This structured approach ensures that all stakeholders have the opportunity to present their evidence and arguments, thereby enhancing the accuracy and integrity of the BEAD eligibility determinations.

***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 14-day submission window closes.*

## Rebuttal Phase

After the challenge phase closes and challenges are processed, the rebuttal phase will run for 14 calendar days. At the beginning of the rebuttal phase, all challenges that require a rebuttal will be posted in the challenge portal. See Table for permissible rebutting entity based on challenge type.

<b>Challenge Type</b>	<b>Description</b>	<b>Permissible Rebutting Entity</b>
Availability	The broadband service identified is not offered at the location, including a unit of a multiple dwelling unit.	Only the provider challenged.
Data cap	The only service plans marketed to consumers impose an unreasonable capacity allowance (“data cap”).	Only the provider challenged.
Technology	The technology indicated for this location is incorrect.	Only the provider challenged.
Business service only	The location is residential, but the service offered is marketed or available only to businesses.	Only the provider challenged.



Enforceable commitment	The challenger has knowledge that broadband will be deployed at this location by the date established in the deployment obligation.	Any eligible challenger (ISP, Local or Tribal Government, Non-Profit)
Planned service	The challenger has knowledge that broadband will be deployed at this location by May 30, 2025, without an enforceable commitment.	Any eligible challenger (ISP, Local or Tribal Government, Non-Profit)
Not part of enforceable commitment	This location is in an area that is subject to an enforceable commitment to less than 100 percent of locations and the location is not covered by that commitment. (See BEAD NOFO at 36, n.52.)	Any eligible challenger (ISP, Local or Tribal Government, Non-Profit)
Location is a CAI	The location should be classified as a CAI.	Any eligible challenger (ISP, Local or Tribal Government, Non-Profit)
Location is not a CAI	The location is currently labeled as a CAI but is a residence, a non-CAI business or is no longer in operation.	Any eligible challenger (ISP, Local or Tribal Government, Non-Profit)
Escalating Service Commitments	The challenger offers to deploy broadband service, to speeds that is faster than required by a preexisting enforceable commitment. Escalation must be completed by June 30, 2025. A location will not be reclassified as ineligible for BEAD funding without a signed commitment.	Any eligible challenger (ISP, Local or Tribal Government, Non-Profit)
CAI: Qualifying broadband unavailable	The location is currently labeled as a CAI, but qualifying broadband is unavailable.	Any eligible challenger (ISP, Local or Tribal Government, Non-Profit)
CAI: Qualifying broadband available	The location is currently labeled as a CAI, and qualifying broadband is available	Any eligible challenger (ISP, Local or Tribal Government, Non-Profit)

Broadband providers will be notified directly via email of any challenges against them and provided the details necessary to respond during the rebuttal phase. The challenged provider will have 14 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 nonprofit organizations will receive an email notification when the rebuttal phase has opened. However, they will not receive direct notifications for specific challenges, as they will not be named parties in the challenges. Accordingly, these challenges will remain open for the entire 14-day period. Unlike the provider challenges, other challenge types are still subject to the BDO’s final review and determination.

After a rebuttal is submitted, the BDO 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.

## Final Determination Phase

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

The BDO reserves the right to request additional information or evidence from the challenger or submitter of the rebuttal at any time during the final determination phase.

## How to Participate in the Challenge Process

### Account Registration

To ensure that only eligible entities are able to submit challenges, eligible entities must register for an account in the challenge portal before they can participate in the challenge process. The below outlines how parties interested in participating in the challenge may register for an account in the challenge portal

The screenshot shows a registration form titled "Register For The BEAD Challenge Process" with a close button (X). It is labeled "SECTION 1 OF 2" and "About You". The form contains the following fields:

- Organization Name (text input)
- Organization Website (text input with "https://" prefix)
- Primary Contact Name (text input with search icon)
- Primary Contact Email (text input with email icon)
- Primary Contact Number (text input with phone icon)
- Type of Organization (dropdown menu)

A "Next" button is located at the bottom center of the form.

### Registration Steps

1. **Visit the registration page** – The registration page provides a brief overview of the challenge process and helpful links.
2. **Click “Register”** – 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 an eligible 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. Category 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 Identification (UEI) number assigned by Sam.gov.
    - ii. Tribe’s name as listed by the Bureau of Indian Affairs (BIA).
    - iii. Physical address.
    - iv. Additional documentation to verify identity.
  - e. Nonprofit organization information**
    - i. Employer Identification Number (EIN).
    - ii. Physical address.
    - iii. Additional documentation to verify identity.
4. **Click “Finish” and submit the form** – After you submit the form, you will receive an email confirmation. **No further action is necessary at this point.**
  5. **Wait for account approval** – After submitting your account request, each registration will be manually reviewed by the BDO 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 set a password and complete the setup of your account.

## How to Submit Challenges and Rebuttals

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

### Submitting Challenges

In general, all eligible challengers can submit challenges of any type. The primary exception is “Planned Service or Existing Service,” which will require an agreement between the provider and the BDO.

### Challenge Steps

1. **Log in to the challenge portal** – Users can log in using an email and password combination or use a “Magic Link” that sends an email with a link 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”** – Each option functions differently, but both will allow the challenger to open a challenge submission window. The challenge map provides a geospatial representation of the eligibility designations under BEAD, while the dashboard is your portal to review the challenges you’ve submitted. If you’re a

provider, you will eventually see challenges submitted on your reported service on your dashboard.

4. **Click on “Add Challenge” button** – The “Add Challenge” button is on the top right of the “Submitted Challenges” panel of the challenge map or on the top right of the challenges table on the dashboard. This will open the “Create a Challenge” page, which includes the challenge map with a challenge flow panel on the right and layers that can filter the map based on a range of parameters.
5. **Create a challenge** – Creating a challenge in the challenge portal requires several steps:
  - a. **Select challenge class and type** – Each challenge category includes multiple challenge types to select from:
    - i. **Planned or existing service.**
      1. Planned service.
      2. Escalating service.
      3. Existing service.
    - ii. **Enforceable commitments.**
      1. Covered by enforceable commitment.
      2. Not covered by enforceable commitment.
    - iii. **Provider service level.**
      1. Availability.
      2. Data cap.
      3. Technology.
      4. Business service only.
    - iv. **CAI classification.**
      1. Location is a CAI.
      2. Location is not a CAI.
      3. CAI: Qualifying broadband unavailable.
      4. CAI: Qualifying broadband available.
  - b. **Select challenge details** – After selecting the “Challenge Type,” the data in the map will be filtered to display only those locations 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 described further throughout this document.
  - 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 individually 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” and then click “Confirm” in the following prompt. You can select multiple locations to be submitted as part of the same challenge submission using this method.
- ii. **Add locations in bulk** – When filing bulk challenge submissions, you can add locations in groups, rather than adding each location individually. There are three ways to add multiple locations as a group:
  - 1. **Upload list of locations** – This method allows you to upload a list of valid “Fabric Location IDs” in a .csv format. The .csv must be a single column with the header “location\_id.”
  - 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 and 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. **Shift+click+drag cursor** – This method allows you to quickly select multiple locations directly on the map. This is the quickest but least precise method of selecting multiple locations, because the selection boundaries are in a rectangular shape. Once you’ve selected locations using this method, you’ll be prompted to confirm you want to add these locations to your challenge. The prompt will include the number of locations you’ve selected.

**Removing locations from selection** – If you inadvertently added locations, you do not wish to challenge, you can remove the locations 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’ve finalized the location(s) you want to challenge, you will be asked to provide any evidence and documentation you want included in the review of your challenge. For challenges that may require you to provide separate evidence files per location, you will be prompted to download a .csv file with the selected location.
- e. **Attestation** – After you’ve uploaded your evidence, you will be required to accept and complete an attestation that, to the best of your knowledge and belief, the challenge is true, complete and accurate, subject to potential civil or administrative penalties.

## Submitting Rebuttals

- 1. Notifications of rebuttal phase sent** – When the rebuttal phase opens, notifications will be sent to all registered eligible challengers to provide formal notice that the challenges are open for rebuttal. All eligible challengers will be notified of the opportunity to submit rebuttals to open rebuttal challenges, which include 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 at the close of the challenge window will initiate the 30-day rebuttal window.
- 2. Log in to the challenge portal** – Users can log in using an email and password combination or a “Magic Link” that sends an email with a link 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 is your portal to review the challenges for which you are eligible to submit rebuttals. In the dashboard, you will have two tabs available to review challenges: “Challenges Received” (Providers Only) and “Open for Rebuttal.”
  - a. Challenges Received (Providers Only)** – The “Challenges Received” tab will display the challenges you’ve received against your reported service. The challenges will be grouped by submission and include details such as the challenging entity, challenge type and number of challenged locations.
  - b. Open for Rebuttal** – The “Open for Rebuttal” tab will display all challenges that are not directed at a specific broadband provider, such as “Planned Service,” “Enforceable Commitment” or “CAI challenges.” The challenges will be grouped by submission and include details such as the challenging entity, challenge type, and number of challenged locations.
- 5. Click “View Details”** – To begin the rebuttal process, click “View Details” on the challenge against which you want to submit a rebuttal. 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 locations that were challenged under the selected submission.
- 6. Rebut or accept challenges** – Using the “Locations” tab, you can choose which individual location challenges you want to rebut and which individual location challenges, if any, you want to accept. If you want to rebut or accept all challenges, you can do so

using the “Rebut All/Accept All” button. Note that accepting challenges is only an option for providers reviewing challenges against them, as 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’ve finalized the location(s) you want to rebut, you will be asked to provide any evidence and documentation you want included in the review of your rebuttal.
8. **Attestation** – After you’ve uploaded your evidence, you will be required to accept and complete an attestation that, to the best of your knowledge and belief, the rebuttal is true, complete and accurate, subject to potential civil or administrative penalties.

## Evidence and Documentation Requirements

The evidence and documentation submission are 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 the service reported in the maps at a specific location is not currently available or cannot be scheduled for activation within 10 days, over the reported technology and maximum advertised speeds.

In alignment with the FCC challenge process, the BEAD challenge process requires the “Reason for the Challenge” to be documented using the `reason_code` field from the *FCC Broadband Data Collection: Data Specifications for Bulk Fixed Availability Challenge and Crowdsourcing Data*.<sup>3</sup>

### 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 age of the evidence submitted to support the challenge. If you choose to provide “Other evidence to support challenge” instead of an explicitly stated evidence type, we cannot ensure 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	<ul style="list-style-type: none"> <li>● Screenshot from provider website</li> </ul>	365 days

<sup>3</sup> See “Broadband Data Collection: Data Specifications for Bulk Fixed Availability Challenge and Crowdsourcing Data (Section 3.2),” FCC, Jan. 12, 2023, [bdc-bulk-fixed-challenge-dataspecifications.pdf](#).

Code	Reason	Acceptable Evidence Types for Challenges	Data Age
	schedule a service installation within 10 business days of a request.	<ul style="list-style-type: none"> <li>● Email from provider</li> <li>● Text message or voicemail transcript from provider</li> <li>● Letter from provider (physical or PDF)</li> <li>● Documentation of phone call or in-person interaction</li> <li>● Other evidence to support challenge</li> </ul>	
2	Provider did not install the service at the agreed-upon time.	<ul style="list-style-type: none"> <li>● Screenshot from provider website</li> <li>● Email from provider</li> <li>● Text message or voicemail transcript from provider</li> <li>● Letter from provider (physical or PDF)</li> <li>● Documentation of phone call or in-person interaction</li> <li>● Other evidence to support challenge</li> </ul>	365 days
3	Provider requested more than the standard installation fee to connect the location.	<ul style="list-style-type: none"> <li>● Screenshot from provider website</li> <li>● Email from provider</li> <li>● Text message or voicemail transcript from provider</li> <li>● Letter from provider (physical or PDF)</li> <li>● Documentation of phone call or in-person interaction</li> <li>● Other evidence to support challenge</li> </ul>	365 days
4	Provider denied the request for service.	<ul style="list-style-type: none"> <li>● Screenshot from provider website</li> <li>● Email from provider</li> <li>● Text message or voicemail transcript from provider</li> <li>● Letter from provider (physical or PDF)</li> <li>● Documentation of phone call or in-person interaction</li> <li>● Other evidence to support challenge</li> </ul>	180 days
5	Provider does not offer the technology entered above at this location.	<ul style="list-style-type: none"> <li>● Screenshot from provider website</li> <li>● Email from provider</li> <li>● Text message or voicemail transcript from provider</li> <li>● Letter from provider (physical or PDF)</li> <li>● Documentation of phone call or in-person interaction</li> <li>● Terms of service/service description</li> <li>● End-user contract or offer</li> <li>● Infrastructure knowledge/evidence, including manufacturer and model number of residential gateway</li> </ul>	365 days



Code	Reason	Acceptable Evidence Types for Challenges	Data Age
		<ul style="list-style-type: none"> <li>• Other evidence to support challenge</li> </ul>	
6	Provider does not offer the speed(s) shown on the Broadband Map for purchase at this location.	<ul style="list-style-type: none"> <li>• Screenshot from provider website</li> <li>• Email from provider</li> <li>• Text message or voicemail transcript from provider</li> <li>• Letter from provider (physical or PDF)</li> <li>• Documentation of phone call or in-person interaction</li> <li>• Terms of service/service description</li> <li>• End-user contract or offer</li> <li>• Infrastructure knowledge/evidence</li> <li>• Other evidence to support challenge</li> </ul>	180 days
7	Intentionally omitted <sup>4</sup> (does not constitute a formal challenge).	N/A	N/A
8	No wireless signal is available at this location (only for technology codes 70 and above).	<ul style="list-style-type: none"> <li>• Screenshot from provider website</li> <li>• Email from provider</li> <li>• Text message or voicemail transcript from provider</li> <li>• Letter from provider (physical or PDF)</li> <li>• Documentation of phone call or in-person interaction</li> <li>• Infrastructure knowledge/evidence</li> <li>• Other evidence to support challenge</li> </ul>	365 days
9	New, non-standard equipment had to be constructed at this location.	<ul style="list-style-type: none"> <li>• Screenshot from provider website</li> <li>• Email from provider</li> <li>• Text message or voicemail transcript from provider</li> <li>• Letter from provider (physical or PDF)</li> <li>• Documentation of phone call or in-person interaction</li> <li>• Infrastructure knowledge/evidence</li> <li>• Other evidence to support challenge</li> </ul>	365 days

<sup>4</sup> The availability challenge does not adjudicate whether the actual speeds of the service fall below the advertised speeds. The FCC uses Code 7 for consumer complaints when “Subscribed Speed Not Achievable.”

## Evidence for Availability Rebuttals

Only the challenged provider may submit a rebuttal to a latency challenge. This 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.	<p>Provider shows the location subscribes or has subscribed within the last 12 months (e.g., with a copy of a customer bill).</p> <p>If the evidence was a screenshot and believed to be in error, a screenshot that shows service availability.</p> <p>Provider furnishes a copy of an offer sent to the location for the service at the speeds shown on the Broadband Map.</p>
2	Provider did not install the service at the agreed-upon time.	<p>Provider shows the location subscribes or has subscribed within the last 12 months (e.g., with a copy of a customer bill).</p> <p>If the evidence was a screenshot and believed to be in error, a screenshot that shows service availability.</p> <p>Provider furnishes a copy of an offer sent to the location for the service at the speeds shown on the Broadband Map.</p>
3	Provider requested more than the standard installation fee to connect the location.	<p>The provider submits evidence that service is now available as a standard installation (e.g., via a copy of an offer sent to the location).</p>
4	Provider denied the request for service.	<p>Provider shows the location subscribes or has subscribed within the last 12 months (e.g., with a copy of a customer bill).</p> <p>If the evidence was a screenshot and believed to be in error, a screenshot that shows service availability.</p> <p>Provider furnishes a copy of an offer sent to the location for the service at the speeds shown on the Broadband Map.</p>
5	Provider does not offer the technology entered above	<p>Provider has countervailing evidence from their network management system showing an appropriate</p>

Code	Reason	Acceptable Evidence Types for Rebuttals
	at this location.	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.	<p>Provider shows the location subscribes or has subscribed within the last 12 months (e.g., with a copy of a customer bill).</p> <p>If the evidence was a screenshot and believed to be in error, a screenshot that shows service availability.</p> <p>Provider furnishes a copy of an offer sent to the location for the service at the speeds shown on the Broadband Map.</p>
7	Intentionally omitted <sup>5</sup> (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).
9	New, non-standard equipment had to be constructed at this location.	The 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 three allowable provider service level challenge types: data cap technology, and business service only.

If you choose to provide “other evidence to support challenge” instead of an explicitly stated evidence type, we cannot ensure the evidence will meet the minimum requirements. To support our review, please provide a thorough explanation of any evidence classified as other.

<sup>5</sup> The Availability Challenge does not adjudicate whether the actual speeds of the service fall below the advertised speeds. The FCC uses Code 7 for consumer complaints when “Subscribed Speed Not Achievable.”

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.	<ul style="list-style-type: none"> <li>● Screenshot from provider website</li> <li>● Email from provider</li> <li>● Text message or voicemail transcript from provider</li> <li>● Letter from provider (physical or PDF)</li> <li>● Documentation of phone call or in-person interaction</li> <li>● Terms of service/service description</li> <li>● End-user contract or offer</li> <li>● Other evidence to support challenge</li> </ul>	180 days
Technology	Provider does not offer the technology entered above at this location. (The technology indicated for this location is incorrect.)	<ul style="list-style-type: none"> <li>● Screenshot from provider website</li> <li>● Email from provider</li> <li>● Text message or voicemail transcript from provider</li> <li>● Letter from provider (physical or PDF)</li> <li>● Documentation of phone call or in-person interaction</li> <li>● Terms of service/service description</li> <li>● End-user contract or offer</li> <li>● Infrastructure knowledge/evidence, including manufacturer and model number of residential gateway</li> <li>● Other evidence to support challenge</li> </ul>	365 days
Business Service Only	The location is residential, but the service offered is marketed or available only to businesses.	<ul style="list-style-type: none"> <li>● Screenshot from provider website</li> <li>● Email from provider</li> <li>● Text message or voicemail transcript from provider</li> <li>● Letter from provider (physical or PDF)</li> <li>● Documentation of phone call or in-person interaction</li> <li>● Terms of service/service description</li> <li>● End-user contract or offer</li> <li>● Other evidence to support challenge</li> </ul>	180 days

### Evidence for Additional Provider Service Level Rebuttals

Only the challenged provider may submit a rebuttal to a provider service level determination challenge. This 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 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 documentation that the service listed in the FCC’s Broadband Data Collection (BDC) is available at the location and is marketed to residential customers.

## Enforceable Commitment Challenges

In preparation for the deployment of the BEAD program, the BDO 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 BSLs served by federal and state funding programs.

### Evidence for Enforceable Commitment Challenges

The enforceable commitment challenge allows eligible challengers to provide evidence that unserved or underserved locations have existing federal, state or local funding that should make those 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 the round-trip latency of deployed service will be under 100 ms.
5. An attestation to confirm 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 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, you will need to attach a legally binding agreement with the tribal government, as certified by tribal resolutions.

## Evidence for Enforceable Commitment Rebuttals

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

## Enforceable Commitment Identification – Process and Methodology

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

### Federally Administered Grant Programs

The BDO used the BEAD Eligible Entity Planning Toolkit to identify existing federal enforceable commitments, which includes data on funding from the following programs:

- NTIA Broadband Infrastructure Program.
- NTIA Tribal Broadband Connectivity Program.
- FCC Rural Digital Opportunity Fund.
- FCC Connect America Fund II.
- USDA Rural eConnectivity Broadband Loan and Grant Program.
- USDA Telephone Loan Program.
- USDA Community Connect Grant Program.

The BDO will designate any location awarded through the office's Bringing Online Opportunities to Texas (BOOT) Program as an enforceable commitment and these locations will be ineligible. The BOOT Program is funded by a combination of the federal Coronavirus Capital Projects Fund and state revenue. The BOOT program requires every funded location to be served with at least 100/20 Mbps.

The BDO is aware 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. The BDO plans to incorporate the A-CAM locations published as of October 2024 into the pre-challenge version of the Texas BEAD map. If necessary, an additional deduplication process for Enhanced A-CAM will be conducted in Spring 2025. If you are a provider electing to participate in Enhanced A-CAM, we encourage you to notify the BDO proactively.

The Coronavirus State and Local Fiscal Recovery Funds (SLFRF) program, a part of the American Rescue Plan, delivers \$350 billion to state, local, and Tribal governments across the country to support their response to and recovery from the COVID-19 public health emergency. Recipients may use SLFRF funds for numerous reasons, including to invest in water, sewer, and broadband infrastructure, as well as expanding affordable access to broadband internet.

Broadband infrastructure funded by SLFRF must be designed to deliver, upon project completion, service that reliably meets or exceeds symmetrical download and upload speeds of 100 Mbps, with modified requirements where 100/100 is not practicable. Local and Tribal governments with ongoing broadband infrastructure projects funded fully or partially by SLFRF should notify the BDO proactively through the challenge process.

## Evidence for Not Enforceable Commitment Challenges

The enforceable commitment challenge allows eligible challengers to provide evidence that a location is not covered by an enforceable commitment identified by the BDO. This evidence provided for the challenge type should demonstrate the following:

- Documentation that the provider has defaulted on the commitment or is otherwise unable to meet the commitment. This may include:
  - Public notice of default published by the funding agency.
  - Default notice sent to the provider.
- Documentation that the location(s) are in an area subject to an enforceable commitment to less than 100 percent of locations and the location(s) are not covered by that commitment.
- If locations are on tribal lands, 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.

## 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 percent 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, Escalating or Existing Service Challenges

If a provider plans to deploy service to an unserved or underserved location that will be available by May 30, 2025, they can file a “Planned Service Challenge”.

If a provider plans to deploy service to a location(s) with speeds that are faster than required by a preexisting enforceable commitment after the start of the BEAD challenge process but before June 30, 2025, the provider can submit an “Escalating Service Challenge”. A location will not be reclassified as an escalating service without a signed commitment.

## Evidence for Planned Service Challenges

If you have begun building out broadband service to unserved and/or underserved locations without an enforceable commitment, you may challenge under the “Planned Service” subtype and provide evidence that the service will be available to the locations by May 30, 2025

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 100 ms.
5. An attestation to confirm that service will be deployed to the locations included in this challenge by May 30, 2025, with the technology, speeds and latency provided.
6. Will the planned deployment, including the listed speeds, latency and technology, be deployed to the selected locations by May 30, 2025
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 applied for or obtained.
  - c) Inspection results.
  - d) Construction contracts and invoices.
  - e) You are also encouraged to submit other evidence that may demonstrate the deployment in progress.

For a planned service challenge to be successful, the challenger will be required to enter into a binding agreement with the BDO and the state of Texas 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 the BDO.

## Evidence for Planned Service Rebuttals

Any eligible challenger may submit a rebuttal for a planned service rebuttal. The rebuttal must include countering evidence that demonstrates the planned service cannot be deployed by May 30, 2025

It is anticipated that the primary rebuttals will be submitted by units of local or tribal government with knowledge and evidence that necessary permits, reviews or other pre-construction requirements have not been met.

## Evidence for Escalating 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 the service will be available to the locations by June 30, 2025

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 100 ms.
5. An attestation to confirm that service will be deployed to the locations included in this challenge by June 30, 2025, with the technology, speeds and latency provided.
6. Will the planned deployment, including the listed speeds, latency and technology, be deployed to the selected locations by June 30, 2025



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 applied for or obtained.
  - c) Inspection results.
  - d) Construction contracts and invoices.
  - e) You are also encouraged to submit other evidence that may demonstrate the deployment in progress.

For a planned service challenge to be successful, you will be required to enter into a binding agreement with the BDO and the state of Texas 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 the BDO.

## Evidence for Escalating Service Rebuttals

Any eligible challenger may submit a rebuttal for a planned service rebuttal. The rebuttal must include countering evidence that demonstrates the planned service cannot be deployed by June 30, 2025

It is anticipated that the primary rebuttals will be submitted by units of local or tribal government with 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 locations, 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 100 ms.
5. Indicate if you have already reported the available broadband service to FCC’s Broadband Data Collection Program (BDC).
  - a. If yes, you will need to confirm under which BDC filing window you filed the service.
  - b. 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 that service is deployed and available (as many of the following as possible):
  - a. Submitted BDC filing (if applicable).
  - b. Evidence of subscribers.
  - c. Network diagram of deployments.
  - d. 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

Any permissible challenge may submit a rebuttal for an existing service challenge. The rebuttal must include countering evidence that demonstrates 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 failure to pass inspection or other evidence that demonstrates the provider is unable to deliver service to BSLs as claimed.

## CAI Challenges

There are two categories of CAI challenges, including:

- Identification of CAIs.
- Eligibility based on broadband need.

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

- **Schools:** All K-12 schools participating in the FCC E-Rate program or that have an National Center for Education Statistics (NCES) ID in the “public schools” or “private schools” categories.
- **Libraries:** All libraries participating in the FCC E-Rate program as well as all member libraries and their branches under the American Library Association.
- **Health clinic, health center, hospital or other medical providers:** All institutions that have a Centers for Medicare and Medicaid Services (CMS) identifier.
- **Public safety entity:** Fire houses, emergency medical service stations, police stations, sheriff and constable offices, and public safety answering points (PSAP), based on records maintained by the eligible entity and units of local government. The list of PSAPs includes those in the FCC PSAP registry.
- **Institutions of higher education:** All institutions that have an NCES ID in the “college” category, including junior colleges, community colleges, minority serving institutions, historically black colleges and universities, other universities, or other educational institutions.
- **Public housing organizations:** Identified by contacting the Public Housing Agencies for the state or territory enumerated by the U.S. Department of Housing and Urban Development. The Public and Affordable Housing Research Corporation and National Low-Income Housing Coalition maintain a database of nationwide public housing units at the National Housing Preservation Database.
- **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. The eligible entity included senior centers and job training centers in this category. The U.S. Department of Labor maintains a database of “American Job Training” centers, established as part of the Workforce Investment Act and reauthorized in the Workforce Innovation and Opportunities Act of 2014. The database is accessible at the American Job Center Finder. The National Council on Aging helped identify senior centers.

## Identification of CAI

All eligible 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 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:
  - 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 a community support organization, explanation of how organizations facilitate 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:
  - a. Registration documents.
  - b. Contact information to confirm.
  - c. Other evidence that demonstrates 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 unmet broadband needs based on the standard of at least 1 Gbps symmetrical service.

### Evidence for Location is a CAI Rebuttal

Any eligible challenger may submit a rebuttal for a "Location is a CAI Challenge." The information and evidence must include:

1. The basis for the challenge that claims the location(s) is not a CAI:
  - a. Location is a residence.
  - b. Location is a non-CAI business.
  - c. Institution does not fall under listed category:
    - i. Identify the institution type for which the location should be listed.
  - d. CAI has ceased operations:
    - i. Date CAI ceased operations.
2. Evidence to support rebuttal.

### Evidence for Location is a Not CAI Challenge

If you believe a location is incorrectly identified as a CAI, you may challenge to have that location removed from the list. Please note the BDO is not allowed to add 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. The basis for the challenge that claims the location(s) is not a CAI:
  - a. Location is a residence.
  - b. Location is a non-CAI business.
  - c. Institution does not fall under listed category:
    - i. Identify the institution type for which the location should be listed.
  - d. CAI has ceased operations:
    - i. Date CAI ceased operations.
    - ii. Is there another CAI currently operating at this location? If so, provide the following information:
      - Official entity name of the institution.
      - The type of CAI, selecting from the categories defined above:
        - Depending on the entity type, you will be asked to provide different types of identification numbers (e.g., CCN for hospitals).
        - If a community support organization, explanation of how organizations facilitate greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals and aged individuals.
        - Other evidence that demonstrates the organization meets the requirements of the selected category of CAI.
2. Evidence that demonstrates the location is a non-CAI or is no longer in operation.

## Evidence for Location is a Not CAI Rebuttal

Any eligible challenge 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 CAIs set by the eligible entity or is still operational.

## CAI BEAD Eligibility Based on Broadband Availability

### Evidence for CAI: Qualifying Broadband Unavailable Challenge

If a CAI that is reported to have 1 Gbps symmetrical service, but you have countering evidence you can submit a challenge labeled "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 at least 1/1 Gbps 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:
  - a. Who is the current provider?
  - b. What technology is delivering the current services?
  - c. What are the speeds of your current plan?

3. Upload evidence of recent bill or invoice, photo of the provider gateway, or other evidence to support the challenge.
4. Signed attestation or upload evidence.

## Evidence for CAI: Qualifying Broadband Unavailable Rebuttal

Any eligible challenger may submit a rebuttal for a “CAI Does Not Receive 1 Gbps Service” challenge type. The information and evidence must include evidence that the CAI location has an existing connection capable of delivering 1/1 Gbps speeds or a connection that is readily scalable to 1 Gbps symmetrical speeds at a higher tier of service over the existing infrastructure.

## Evidence CAI: Qualifying Broadband Available Challenge

1. I confirm that selected CAI location(s) have an existing connection capable of delivering 1/1 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:
  - a. Who is the current provider? (Do not use dropdown of providers, as it may not include the network delivering enterprise internet service providers.)
  - b. What technology is delivering the current services? (Dropdown from the “Technologies” used in other challenges.)
  - c. What are the speeds of your current plan?
3. Upload evidence of recent bill or invoice, photo of the provider gateway, or other evidence to support the challenge.
4. Signed attestation or upload evidence.

## Evidence for CAI: Qualifying Broadband Available Rebuttal

Any eligible challenger may submit a rebuttal for a “CAI Does Receive 1 Gbps Service” challenge type. The information and evidence must include evidence that the CAI location does not have an existing connection capable of delivering 1/1 Gbps speeds or a connection that is readily scalable to 1 Gbps symmetrical speeds at a higher tier of service over the existing infrastructure.

## Obtaining CostQuest BSL Fabric Licenses

To administer the BEAD Program, the BDO 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 data set to provide the location data.

The BDO was required to enter into a license agreement with CostQuest Associates, the owner of the data set, to access the data for the BEAD Program including the challenge process. The terms of this license agreement restrict the BDO from making the data fully available to stakeholders participating in the challenge process.

While the BDO 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

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 (i.e., challenges to more than one location in the same submission), we highly recommend you obtain a license from CostQuest, which will allow us to provide a bulk challenge template pre-populated with Location IDs 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, nonprofits and other organizations that have signed an FCC Tier 4 license.  
[Request License](#)