

Illinois Office of Broadband (IOB)

Challenge Process FAQs and Q&A from Past Webinars

As of December 19, 2023

General FAQs:

What is pre-registration and is it required?

The Illinois BEAD Challenge Process portal will open in early 2024 but you are encouraged to pre-register now. Pre-registering for the challenge process is required for two reasons:

- **Communications:** Receive up-to-date communication about the challenge process, including important dates, resources, and updates
- **Identity Verification:** For a challenge to be submitted, the IOB needs to verify that the entity submitting the challenge is eligible

Pre-register at [this link](#) by January 12, 2024.

What is the challenge process?

The challenge process gives Illinoisians an opportunity to correct inaccuracies in the state's broadband map so it reflects the most up-to-date broadband access across the state. The updated map will determine which locations are eligible for funding through the BEAD program.

Who is eligible to submit a challenge?

NTIA rules allow units of local government, non-profit organizations, and internet service providers to submit challenges. Individuals in Illinois can participate by visiting [BEADchallenge.org](#) and following the instructions for taking internet speed tests and submitting the results, or by coordinating with registered local governments or non-profits to submit a challenge.

When is the challenge process happening?

Illinois intends to launch its challenge process in mid-January and it will be open for at least two weeks. Final timing depends on approval from NTIA.

Questions from December 5, 2023 Webinar:

If my whole neighborhood appears as green on the map (served), does that mean I am ineligible to participate?

No, the purpose of the challenge process exercise is to correct inaccuracies on the map. The way the map looks may not reflect your experience. If it doesn't, then you're encouraged to participate in the challenge process.

Is the list of CAIs going to change from this point forward or is the list finalized?

The list of CAIs on the IOB website has not yet been updated.

Will Connect Illinois Round 3 awards be reflected on the map?

Yes, Connect Illinois awards will be reflected on the broadband challenge map to be published in early January.

Can I edit information I submitted through the pre-registration form, and if so, how?

If you would like to change the information you submitted, please re-submit the form. The IOB will remove duplicates on the back end, and refer to your most recent submission.

Questions from December 12, 2023 Webinar:

Is there a way to verify that I pre-registered?

Email devon.braunstein@illinois.gov to request a confirmation. The Illinois Office of Broadband will also send you a confirmation email prior to the challenge process beginning.

Is there more specific guidance on what would be acceptable evidence for "lack of suitable infrastructure" within a multi-dwelling unit (MDU)?

You can challenge on the basis of speed or availability by providing evidence that shows a provider does not offer qualifying service to a unit. The most substantive evidence to demonstrate this is:

- Documentation of a service request refused within the last 180 days (e.g., an email or letter from provider), or
- A letter or email dated within the last 365 days showing that a provider failed to schedule a service installation or offer an installation date within 10 business days of a request.

Can an internet service provider challenge an area or location that appears on the Illinois broadband map as served, but is not actually served (no fiber), AND in the same challenge, make a build out proposal for the same location?

Participants can challenge areas and locations that appear as served on the map. Following the challenge process, there will be a sub-grantee process where the IOB will solicit proposals for broadband builds. During this period, internet service providers can submit proposals to serve an area or location.

Is there a minimum of challenge submissions required? For example, if a nonprofit only submits one challenge, will that still be valid?

There is no minimum number of challenges required to participate. A participant can submit one challenge, or several.

How much time will be available to submit the challenges? If there is an entire area that is affected, can you submit a challenge for an area instead of a single address?

We anticipate that the challenge process will be open for at least two weeks. Participants can submit challenges for a single address, or a geographic area. Participants will be able to do this

by selecting an area on a map (manually or by using a “lasso” tool), or submitting a CSV with several locations.

As I understand it, the challenge is location based. Does that mean that every location that we believe is incorrect will have to be challenged to be changed? In other words, we may get only some locations challenged and others in that area may still show incorrect data?

A challenge is required for each location that a participant would like to correct. There will be ways to submit bulk challenges, such as by selecting multiple locations at once or submitting a CSV file.

Additionally, an Area Challenge will be automatically triggered if 6+ Broadband Serviceable Locations (BSLs) within a census block group are challenged and all use a particular technology and single provider. An Area Challenge puts the burden of proof on the internet service provider to demonstrate that availability, speed, latency, data caps and technology for all BSLs within a census block group are consistent with what is reported on the map. Similarly, an MDU Challenge will be automatically triggered if the following number of units located within the MDU are challenged:

- 1+ units challenged for MDUs with <15 units
- 2+ units challenged for MDUs with 16 – 24 units
- 3+ units challenged for MDUs with 25+ units

MDU challenges can count towards an area challenge (e.g., 6 MDU challenges in a census block group can trigger an area challenge).

A provider receiving an MDU challenge must show that the inside wiring is reaching all units and is of sufficient quality to support the claimed level of service in the MDU.

Should everyone pre-register as a matter of course?

We encourage you to pre-register if you think you might participate in the challenge process, or want to stay up to date on the process. There is no harm in pre-registering.

As registered local government reps, will we be notified about enforceable commitment / planned service challenges so we can provide rebuttals?

The enforceable commitments information will be published on the BEAD Challenge Map and local governments can submit a challenge if locations are not part of an Enforceable Commitment (challenge code N). Also, if there are locations that should be part of an Enforceable Commitment, but are not reflected as such, a challenger can file an Enforceable Commitment (code E) Challenge.

Providers can submit information about Planned Commitments during the challenge process, along with evidence that the deployment will be complete by June 30, 2024.

What does “unreasonable” mean with respect to data caps? Does subscription cost factor into this?

An unreasonable data cap is any plan that has a cap of less than 600 GB per month. It does not consider subscription cost.

Does the BEADchallenge.org tool differentiate between wired and other sources of internet like fixed wireless?

No, the tool only captures performance metrics along with the user's data.

Can we start gathering data on BEADchallenge.org immediately or is it only valid during a certain time window?

You can start gathering speed test data now. The NTIA rules say speed test data must be from within 60 days of the start of the challenge period. Illinois' challenge window is expected to open in mid-January.

Is speed test data submitted through BEADChallenge.org tool going to challenge for Illinois only, or for all states?

The tool is currently programmed for submitting challenges in Illinois. However, should another state be interested in leveraging it for their challenge process, the speed test and code is open-source and can easily be adapted to another state.

I didn't notice a date/time clearly on the results from the BEADChallenge.org site. Will that be displayed in the final version of this tool? Or will we need to tell people to use their PC clock somehow to display that info?

The timestamp is recorded along with the speed test performance results.

I don't see an "existing service" challenge type. How do you anticipate ISP challengers should handle new deployment, not reflected as served on the map?

Planned, privately funded deployments that are not currently reflected on the map can be submitted during the challenge process under the category Planned Service (code P).

What happens if a resident subscribes to 100/100 mbps, but their speed test comes up at fewer mbps? That address may be deemed eligible when in fact the house is receiving 100/100 or better, but the actions of the individual and the house layout is really the issue.

If the median of three speed tests taken on three separate days delivers a result slower than 100/20 mbps, then this provides evidence that the location may be underserved, if the household subscribes to a 100/20 mbps or faster plan.

Challenger should take the speed test on their laptop or computer within immediate proximity of the residential gateway, which is the router, in most cases. This will look different based on each home and circumstance, but a good faith effort to take the test near the router is advised for the most accurate results.

Will the state be releasing CSV files of the unserved and underserved Location IDs?

The Location IDs will be a part of the challenge map (coming in January). You'll be able to search for a location(s) on the map, and then initiate a challenge from there, which will include the

respective Location IDs. The IOB will also publish the list of Location IDs associated with unserved and underserved locations.

What happens if a location qualifies as eligible for funding during the challenge process? Is there improvement to internet infrastructure, funding to the CAI or individual, or other?

If a location is verified as unserved or underserved, it will be prioritized for BEAD infrastructure funding. Once the map is finalized, the IOB will open a process for broadband providers to apply for grant funding to bring 100/20 mbps or higher service to unserved and underserved locations.

In short, the funding goes toward improving internet infrastructure.

Many of our underserved are highly mobile, renters, move quickly, couch surf, sometimes homeless--addresses are not reliable often. Ideas for this?

The challenge process is intended to verify the status of broadband service to specific locations, not to specific individuals. A person can test and challenge the service in the locations where they are residing or staying, even if they are only there temporarily. The basic requirement for speed testing is that it is performed on three separate days from the same location. When taking a speed test, the participant must be connected to local fixed internet (Wi-Fi network, not cellular data).

If an unserved area has no service, will e-mail and chat exchanges with vendors indicating service is not available be acceptable as a challenge?

Yes. This may qualify as an Availability challenge, which accepts evidence such as:

- A service request was refused within the last 180 days (e.g., an email or letter from provider)
- A letter or email dated within the last 365 days indicating that a provider requested more than the standard installation fee to connect this location or that a Provider quoted an amount in excess of the provider's standard installation charge in order to connect service at the location

If a BSL is served at 100/20 mbps by cellular, but not fiber or licensed wireless, will it be denoted as served on the BEAD map?

No. Only wired, licensed fixed wireless, and licensed by rule fixed wireless technologies will be considered when defining availability status.

When will the latest maps be available for review to determine if the areas we're focused on are considered served? Or if we should challenge?

Early January.

Questions from December 19, 2023 Webinar:

Can you fill out a Pre-registration for each person who needs to get challenge emails?

Yes.

If we have several companies do we need to register each company or just one company? Yes we have multiple companies that could want to challenge.

Eligible entities, including non-profits, internet service providers, and units of local government, must pre-register to participate in the challenge. Only one person from an organization needs to pre-register, but more than one person can register. If a consultant is assisting a provider with the challenge process, they should pre-register *separately* for each internet service provider they are assisting.

Can you provide a link to the map of multi-dwelling units (MDUs) in Illinois?

The list of MDUs will be published as part of the BEAD Challenge Map in January.

My area has broadband access, but I am a public library administrator and we are losing access to our affordable intergovernmental fiber internet line. As a CAI, would we qualify as BEAD participant?

Once the Challenge Map is available, you can search for the library's location and view whether the location is considered eligible or ineligible for funding. This eligibility will be determined based on the location's proximity to technology with provides 1 gig symmetrical service. If the location is marked as ineligible for funding, but you have documentation that the location cannot access 1 gig symmetrical service, this documentation can be submitted as evidence during the challenge process.

We are trying to do some work ahead of the challenge period. Does the current map provide any relevant data? Can we use that data to target testing prior to the challenge period? Can you take a few minutes to review the data on the current map to ensure we know how to know what areas may need to be challenged?

The existing [Illinois Broadband Map](#) indicates whether Broadband Serviceable Locations (BSLs) and some Community Anchor Institutions (CAIs) are served, unserved, or underserved. There are also the Federal and State Grant Program tabs that show areas served by other funding sources (that may or may not meet BEAD requirements). On the current map, all these different pieces of information may not be available at the location level and may not contain the most up to date information on BEAD eligibility, so the IOB recommends that you refer to the BEAD Challenge Map, which will be available in January.

The BEAD Challenge Map that will be released in January 2024 will have the most accurate eligibility information for BEAD, based on the latest FCC maps, including prior state and federal funding for broadband deployment that meets BEAD definitions of reliable high-speed internet.

On the existing [Illinois Broadband Map](#), can you discuss the grant eligibility pages to explain what they add as well?

The current Grant Eligibility Tab on the Illinois Broadband Map is intended to show eligibility for the Connect Illinois Grant Program. This eligibility differs from BEAD requirements and hence,

these mapping layers are not recommended for use when considering BEAD-eligible areas in your community.

The BEAD Challenge Map that will be released in January 2024 will have the most accurate eligibility information for BEAD, based on the latest FCC maps, including prior state and federal funding for broadband deployment that meets BEAD definitions of reliable high-speed internet.

How would consultants or entities that are assisting providers with the challenge process get registered for access to the challenge map?

Consultants or entities assisting providers with the challenge process can pre-register for the challenge process. If a consultant is assisting a provider with the challenge process, they should pre-register *separately* for each internet service provider they are assisting.

To confirm, will DSL technology be judged as underserved? Just for MDUs? Or any address?

Location served only by DSL technology will be considered underserved.