

# Illinois BEAD Challenge Process Guidebook

## CONNECT ILLINOIS

Broadband Equity, Access, and  
Deployment (BEAD)

February 2024

[DCEO.illinois.gov/BEADchallenge](https://DCEO.illinois.gov/BEADchallenge)

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# Glossary

## **Broadband Serviceable Location (BSL)**

A broadband serviceable location (BSL) is “a business or residential location in the United States at which mass-market fixed broadband Internet access service is, or can be, installed.”

## **Unserved location**

A location that does not have access to ANY broadband, which is defined by speeds of 25/3 megabits per second (Mbps)

## **Underserved location**

A location that has access to basic speeds of 25/3, but does not have access to speeds of 100/20 Mbps. OR, latency is greater than 100 milliseconds (ms)

## **Served location**

A location with access to broadband with speeds of 100/20 Mbps (or higher)

## **Community Anchor Institution (CAI)**

Institutions that provide critical services and support to residents, especially those in underrepresented communities

## **Multiple-dwelling unit (MDU)**

A structure with multiple but separate housing units (e.g., an apartment building)

## **Latency**

The time it takes data to go to a server and back to your connection. If you have high latency, it can cause video meetings to be choppy or freeze. “Good” latency is 100 ms or lower

# I Overview

The Federal Bipartisan Infrastructure Law of 2021 includes \$42.45 billion for the Broadband Equity, Access, and Deployment (BEAD) Program to expand broadband connectivity across the country over the next five years, with the goal of universal coverage.<sup>1</sup> The National Telecommunications and Information Administration (NTIA) is charged with administering the program. The NTIA allocated just over \$1.04 billion in BEAD funding to Illinois.<sup>2</sup>

The BEAD Program rules require states to prioritize funds in this order:

1. Connect unserved locations (where available service is less than 25/3 megabits per second (Mbps))
2. Connect underserved locations (where available service is at least 25/3 Mbps but less than 100/20 Mbps)
3. Connect eligible “community anchor institutions” (such as libraries and schools) to at least 1 gigabit per second (Gbps) symmetrical service.

To confirm which locations are eligible for BEAD project funding, each state must conduct a process that gives stakeholders an opportunity to challenge the accuracy of the existing broadband maps. The Challenge Process is critical to ensuring that the Illinois broadband map identifies every unserved and underserved location and eligible CAI so that BEAD funds are deployed where they are needed.

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<sup>1</sup> <https://broadbandusa.ntia.doc.gov/funding-programs/broadband-equity-access-and-deployment-bead-program>

<sup>2</sup> <https://broadbandusa.ntia.doc.gov/news/latest-news/biden-harris-administration-announces-state-allocations-4245-billion-high-speed>

## II When will the Challenge Process take place?

The Illinois Office of Broadband (IOB) has published all served, unserved, and underserved locations as well as the location and eligibility of all community anchor institutions (CAIs) in CSV format (available at [DCEO.illinois.gov/BEADchallenge](https://DCEO.illinois.gov/BEADchallenge)) and in a BEAD Challenge Map at [bead.connectednation.org/illinois](https://bead.connectednation.org/illinois).

Eligible challengers and the public have the opportunity to review location designations before the Illinois BEAD Challenge Portal goes live. The Challenge Phase will officially begin one week after public documentation is published, including an explanation of the state’s Challenge Process, the classification of all locations and CAIs, and the timeline for the full Challenge Process. Per NTIA guidance, **the Challenge Process will take no more than 120 days to complete.**

### Illinois BEAD Challenge Process Phases and Timeline:

Phase	Duration and Dates
<p><b>Publication of Eligible Locations</b></p> <p><i>Public documentation posted, including an explanation of the state’s Challenge Process, the classification of all locations and CAIs, and the timeline for the full Challenge Process.</i></p> <p><i>The IOB informs units of local government, non-profits, and internet service providers about the challenge process timeline, deadlines, and how each will be notified of challenges.</i></p>	<p>7 days</p> <p>February 20 – February 26, 2024</p>
<p><b>Challenge Phase</b></p> <p><i>The IOB accepts challenges.</i></p>	<p>21 days</p> <p>February 27 – March 18, 2024</p>
<p><b>Challenge Validation (Pre-Rebuttal)</b></p> <p><i>The IOB reviews challenges submitted during Challenge Phase and evaluates for Minimum Level of Evidence. Then, IOB publishes all challenges on the BEAD Challenge Map website, determines area challenges and prepares for Rebuttal Phase.</i></p>	<p>28 days</p> <p>March 19 – April 15, 2024</p>
<p><b>Rebuttal</b></p>	<p>21 days</p>

<i>The IOB posts accepted challenges and shares notifications about rebuttal opportunities. The IOB accepts rebuttals.</i>	April 16 – May 6, 2024
<b>Final Adjudication</b> <i>The IOB reviews and validates rebuttals, then posts publicly to the BEAD Challenge Map website. Finally, the IOB reviews all challenges and rebuttals and finalizes the BEAD Challenge Map.</i>	May 7 – June 18, 2024  (Remainder of the 120-day Challenge Process window)
<b>Publication of Final Determinations</b> <i>The IOB publishes the final determinations after NTIA review.</i>	Early Summer 2024, but dependent on the NTIA review and approval timeline

**1. Publication of Eligible Locations:** February 20 – February 26, 2024 (7 days)

The BEAD Challenge Map is available at [bead.connectednation.org/illinois](https://bead.connectednation.org/illinois).

The map is based on the FCC National Broadband Map last updated 01/23/24. Data on broadband-serviceable locations (BSLs) is based on availability reported in the FCC BDC as of June 30, 2023.

The map includes:

- Served BSLs, which are locations with access to at least 100/20 Mbps by technology that meets the definition of reliable broadband service, and with latency of 100 milliseconds (ms) at most.<sup>3</sup>
  - › BSLs have been designated as “served” if they will be connected to 100/20 Mbps or greater speeds through a state or federal infrastructure grant program, such as the Rural Digital Opportunity Fund, Connect America Fund II, USDA ReConnect, and the other Connect Illinois funding rounds. These are considered Enforceable Commitments.

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<sup>3</sup> The BEAD NOFO defines reliable broadband service as “broadband service that the Broadband DATA Maps show is accessible to a location via: (i) fiber-optic technology, (ii) cable modem/hybrid fiber-coaxial technology, (iii) digital subscriber line (DSL) technology, or (iv) terrestrial fixed-wireless technology utilizing entirely licensed spectrum or using a hybrid of licensed and unlicensed spectrum.”

- Underserved BSLs, which are locations that lack access to reliable broadband service with speeds of less than 100/20 Mbps and more than 25/3 Mbps.<sup>4</sup>
  - › BSLs that were designated “served” only by DSL in the FCC National Map were modified to become “underserved” by the Illinois pre-challenge modification.
- Unserved BSLs, which are locations that lack access to reliable broadband service with speeds less than 25/3 Mbps.<sup>5</sup>
- Service providers, advertised speeds, and reliable broadband technologies, which are used to define the broadband availability status of a location or community anchor institution. Per NTIA guidance, Copper, Cable, Fiber, Licensed and Licensed-By-Rule Fixed Wireless are considered reliable technologies.
- Identification of eligible community anchor institutions (CAIs) (e.g., colleges and universities, schools, hospitals, libraries, etc.).
- GIS and address information for identified community anchor institutions.

## 2. **Challenge Phase:** February 27 – March 18, 2024 (21 days)

During the challenge phase, eligible challengers can submit challenges and supporting evidence through the Illinois BEAD Challenge Portal. (Please see Section V for more details on accessing and using the Illinois BEAD Challenge Portal and Section IV for more details on challenge types and evidentiary requirements.)

## 3. **Challenge Validation (Pre-Rebuttal):** March 19 – April 15, 2024 (28 days)

Following the Challenge Phase, the IOB team will review all submitted challenges and evidence, and determine if challenges meet the evidentiary requirements (known as the Minimum Level of Evidence, or MLE). The IOB will identify challenges that trigger an Area Challenge or MDU Challenge. The IOB will also use this time to follow up with challengers who submitted partial or incomplete information during the challenge window.

At the conclusion of this phase, all challenges will be published online, which then triggers the start of the 21-day Rebuttal Phase.

## 4. **Rebuttal:** April 16 – May 6, 2024 (21 days)

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<sup>4</sup> The BEAD NOFO defines an underserved location as “a broadband-serviceable location that is (a) not an unserved location, and (b) that the Broadband DATA Maps show as lacking access to reliable broadband service offered with: (i) a speed of not less than 100 Mbps for downloads, (ii) a speed of not less than 20 Mbps for uploads, and (iii) latency less than or equal to 100 milliseconds.”

<sup>5</sup> The BEAD NOFO defines an unserved location as “a broadband-serviceable location that the Broadband DATA Maps show as (a) having no access to broadband service, or (b) lacking access to reliable broadband service offered with: (i) a speed of not less than 25 Mbps for downloads, (ii) a speed of not less than 3 Mbps for uploads, and (iii) latency less than or equal to 100 milliseconds.”

During the Rebuttal Phase, challenged entities will be notified of challenges and can submit a rebuttal with supporting evidence. (Please see Section IV for more details on evidentiary requirements for rebuttals.)

Eligible challengers will have 21 calendar days to submit a rebuttal, including supporting evidence through the Challenge Portal.

### Who can participate in the Rebuttal process?

Eligible Rebutter	Scenario that will invite a rebuttal	How rebutter will be notified
Internet Service Providers (ISPs)	For challenges related to location eligibility, <b>only the ISP whose service was challenged</b> may rebut the reclassification of a location or area with evidence.	ISPs whose service was challenged will be notified via email, and prompted to log into the Challenge Portal to view and rebut challenges within the 21-day window.
Any Eligible Challenger <i>(Non-Profit, Unit of Local Government, ISP)</i>	A CAI, or any eligible challenger, may rebut a challenge to a CAI if: <ul style="list-style-type: none"> <li>• If an ISP claims 1 Gbps symmetrical service availability for a CAI, or</li> <li>• A location’s CAI status is disputed.</li> </ul>	Challenges will be displayed on the BEAD Challenge Map website. Publication of challenges will be widely communicated by the IOB.
	If an ISP submits a Planned Service or Enforceable Commitment challenge type, any eligible challenger can rebut.	

At the conclusion of the Rebuttal Phase, the IOB will post all submitted challenges and rebuttals before final challenge determinations are made, including:

- The provider, non-profit, or unit of local government that submitted the challenge
- The census block group containing the challenged broadband-serviceable location
- The provider being challenged
- The type of challenge (e.g., availability or speed)



- A summary of the challenge, including whether the provider submitted a rebuttal

The IOB will not publicly post any personally identifiable information (PII) or proprietary information, including subscriber names, street addresses, and customer IP addresses. To protect all PII, the IOB will review the basis and summary of all challenges and rebuttals to ensure that PII is removed prior to posting them on the website. Additionally, all challengers will receive guidance as to which information they submit may be posted publicly.

The IOB will treat information designated as proprietary and confidential and submitted by a broadband service provider consistently with applicable laws. If any of these responses do contain information or data that the submitter deems to be confidential commercial information that should be exempt from disclosure under state open records laws, or is protected under applicable state privacy laws, that information must be identified as privileged or confidential within the evidence provided or by emailing [broadband@illinois.gov](mailto:broadband@illinois.gov) with “Challenge Process – Confidential” in the subject line. Otherwise, the responses will be made publicly available.

#### 5. Final Adjudication Phase: May 7, 2024 – June 18, 2024

During the Final Determination phase, the IOB will review the evidence for each challenge and any associated rebuttals. The IOB will then make the final determination of the location’s classification:

- If the IOB **sustains** the challenge, the challenge is upheld, and the classification of the BSL or CAI changes.
- If the IOB **rejects** the challenge, the challenge is not upheld, and the classification of the BSL or CAI does not change.

Other determinations include:

Challenge is incomplete (I), Provider agreed with the challenge (A), Provider did not respond within the rebuttal deadline (N), and the challenge is considered moot because another challenge to the same location and of the same type was successful (M).

#### 6. Publication of Final Determinations: Expected early Summer 2024, but dependent on NTIA review and approval

After the conclusion of the Challenge Process, the state will conduct a final deduplication to remove any BSLs that have an Enforceable Commitment, and the state may choose to update FCC BDC availability data to the most recent version available at the time. Then, the IOB will submit all Challenge Process data (challenges, rebuttals, decisions, final unserved and underserved list, and final eligible CAI list) to NTIA for final review and approval.

After approval by the NTIA, the IOB will publish the BEAD Challenge Map for at least 60 days prior to allocating grant funds.

The Final Determination results will be posted at [dceo.illinois.gov/beatchallenge](https://dceo.illinois.gov/beatchallenge) and [beat.connectednation.org/illinois](https://beat.connectednation.org/illinois).

# III Who can participate in the Challenge Process?

## Eligible Challengers

The NTIA rules for the BEAD Program allow three types of organizations to participate directly in the BEAD Challenge Process<sup>6</sup>:

- Units of local government
- Non-profit organizations
- Internet service providers

Before participating in the Challenge Process, eligible challengers must pre-register to verify their eligibility and gain access to the Illinois BEAD Challenge Portal.

Pre-registration will be available on a rolling basis and can be initiated by visiting:

<https://go.illinois.edu/BEADChallengePreregistration>.

Organizations are encouraged to pre-register before the Challenge Process to ensure prompt access to credentials that will allow them to use the Illinois BEAD Challenge Portal. Creating credentials and verifying that challengers are eligible to participate takes three business days, so eligible challengers are encouraged to pre-register as soon as possible. *To allow time for verification and credential generation, pre-registration will close on March 13 at 5 pm CT, five days prior to the close of the Challenge Phase.*

## Role for Residents and Businesses (other than internet service providers)

Individual residents and businesses (other than internet service providers) in Illinois can participate in the Challenge Process in the following ways:

- Submit a Speed or Latency challenge through the non-profit Internet Equity Initiative by using the speed test tool at [beadchallenge.org](http://beadchallenge.org).
- Contact a local government or non-profit requesting that they submit a challenge on their behalf. Local governments and non-profits can reach out to [broadband@illinois.gov](mailto:broadband@illinois.gov) for support with pre-registering and preparing a challenge.

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<sup>6</sup> [NTIA BEAD Challenge Process Policy Notice](#)

## IV What can be challenged, and what evidence is required?

The BEAD Challenge Process is designed to accommodate the various challenge categories that are necessary to develop an accurate list of BEAD-eligible locations. In alignment with the [NTIA BEAD Challenge Process Policy Notice](#), the IOB will only accept challenges related to the following:

- The identification of eligible community anchor institutions (CAIs), defined below in Table 1
- BEAD eligibility determinations for CAIs
- BEAD eligibility determinations for existing broadband-serviceable locations (BSLs)
- Enforceable commitments
- Planned service

The associated challenge types, codes, and examples are detailed in Table 2. Additionally, to ensure that each challenge is adjudicated fairly for all participants and stakeholders, the IOB will review all applicable challenge and rebuttal information in detail and without bias before deciding to sustain or reject a challenge.

**Table 1: Community Anchor Institution (CAI) Definitions<sup>7</sup>**

CAI type	Category and definition (if necessary)
School or institute of higher education	<b>Colleges and universities:</b> all post-secondary education facilities as defined by the Integrated Post-Secondary Education System (IPEDS), the National Center for Education Statistics (NCES), and the U.S. Department of Education (ED) for the 2019-2020 school year.
School or institute of higher education	<b>Supplemental colleges:</b> additional post-secondary education features from websites of all colleges in Illinois that are not included in the National Center for Education (NCES) Integrated Post-Secondary Education System (IPEDS)
School or institute of higher education	<b>Private schools:</b> 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 “private schools,” combined with private elementary and secondary education facilities in the United States as defined by the Private School Survey (PSS), National Center for Education Statistics (NCES), and U.S. Department of Education for the 2017-2018 school year.

<sup>7</sup> [Illinois BEAD Initial Proposal, Volume 1](#)

CAI type	Category and definition (if necessary)
School or institute of higher education	<b>Public schools:</b> 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,” combined with all public elementary and secondary education facilities in the United States as defined by the Common Core of Data (CCD), National Center for Education Statistics (NCES), and U.S. Department of Education for the 2019-2020 school year.
Libraries	<b>Libraries:</b> All libraries that are members of ILLINET and any additional public libraries, including those participating in the FCC E-Rate program and all libraries and their branches that are members of the American Library Association (ALA). <sup>8</sup>
Government building	<b>State government buildings:</b> Buildings or properties that are owned or leased by state-level governments. This CAI type includes buildings occupied by the headquarters of cabinet-level, state government executive departments; legislative office buildings outside the capitol building; offices and court rooms associated with the highest level of the judicial branch of the state government; and large, multi-agency state office buildings.
Government building	<b>County government buildings:</b> Government center of each county government.
Health clinic, health center, hospital, or another medical provider	<b>Hospitals:</b> All hospitals identified in data by the following entities: the Defense Health Agency, State of Illinois, and the U.S. Department of Veteran Affairs. The data set includes children’s, chronic disease, critical access, general acute care, long-term care, military, psychiatric, rehabilitation, special, and women’s hospitals. The data set does not include nursing homes or health centers.
Health clinic, health center, hospital, or another medical provider	<b>Urgent care facilities:</b> Any location that can provide emergency medical care and must provide emergency medical treatment beyond what can normally be provided by an EMS unit, must be able to perform surgery, or must be able to provide recuperative care beyond what is normally provided by a doctor's office.
Health clinic, health center, hospital, or another medical provider	<b>Public health departments:</b> Locations of public health departments that may be locally governed, part of a region or district, an office or administrative unit of the state health department, or a hybrid of these.
Health clinic, health center, hospital, or	<b>Nursing homes:</b> Nursing and assisted care facilities.

<sup>8</sup> ILLINET is a statewide library alliance representing academic, public, school, and special libraries that are members of the Illinois library system.

CAI type	Category and definition (if necessary)
another medical provider	
Public safety entity	<b>Local law enforcement:</b> Agencies that are "publicly funded and employ at least one full-time or part-time sworn officer with general arrest powers," as defined by the U.S. Department of Justice. Federal-level law enforcement agencies are excluded from this effort.
Public safety entity	<b>Fire stations:</b> Manned fire stations and buildings from which a fire response occurs, such as a volunteer fire department building to which fire fighters report for duty, but which is not continuously manned. The data includes both private and governmental entities.
Public safety entity	<b>FBI field offices:</b> FBI field office locations in the United States and its territories
Public safety entity	<b>U.S. Court of Appeals</b>
Public safety entity	<b>Courthouses:</b> All court buildings that handle county-level court functions, usually located in the city designated as a county seat
Public safety entity	<b>EMS stations</b>
Public safety entity	<b>State and local prisons and jails:</b> Secure detention facilities with jurisdiction at the local government level, combined with list of correctional facilities provided by the Illinois Department of Corrections.
Public safety entity	<b>Federal prisons:</b> Secure detention facilities with jurisdiction at the federal government level.
Public housing organization	<b>Public housing agencies and HUD-assisted housing organizations:</b> County-level data on available public housing in Illinois.
Community support organization	<b>Childcare centers:</b> Center-based child day-care locations (including those located at schools and religious institutions); does not include group, home, and family-based child day-care facilities.
Community support organization	<b>Employment centers:</b> IDES administrative offices, call centers, processing centers, American Job Centers, and IDES local and regional offices.
Community support organization	<b>Re-entry support organizations:</b> Non-profit organizations and community centers supporting transition to life after prison, as identified by the Illinois Re-entry Guide.
Community support organization	<b>Senior centers:</b> Area Agency on Aging

CAI type	Category and definition (if necessary)
Community support organization	<b>Community-based organizations (CBOs):</b> Community-based non-profit organizations responsible for connecting low-income individuals to essential resources and social services.
Park	<b>Parks:</b> State parks, state wildlife areas, state recreational areas, state forests, historic sites, county forest reserve districts, and regional offices of the Illinois Department of Natural Resources.

Table 2: Allowed Challenge Types and Examples of Evidence<sup>9</sup>

Code	Challenge type	Description	Evidence: Specific examples	Permissible rebuttals
A	Availability	The broadband service identified is not offered at the location, including a unit of a multiple dwelling unit (MDU).	<p>Screenshot of provider webpage.</p> <p>A service request was refused within the last 180 days (e.g., an email or letter from a provider).</p> <p>Lack of suitable infrastructure (e.g., no fiber on pole).</p> <p>A letter or email dated within the last 365 days stating that a provider failed to schedule a service installation or offer an installation date within 10 business days of a request.<sup>10</sup></p> <p>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 to connect service at the location.</p>	<p>Provider shows that 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>The provider submits evidence that a service is now available as a standard installation—e.g., via a copy of an offer sent to the location.</p>

<sup>9</sup> [Illinois BEAD Initial Proposal, Volume 1](#)

<sup>10</sup> A standard broadband installation is defined in the Broadband DATA Act (47 U.S.C. § 641(14)) as “[t]he initiation by a provider of fixed broadband internet access service [within 10 business days of a request] in an area in which the provider has not previously offered that service, with no charges or delays attributable to the extension of the network of the provider.”

Code	Challenge type	Description	Evidence: Specific examples	Permissible rebuttals
S	Speed	For BSL: The actual speed of the service tier falls below the unserved or underserved thresholds. <sup>11</sup> For CAI: The location of the CAI lacks access to at least 1 Gbps symmetrical service.	Speed test by subscriber, showing the insufficient speed and meeting the requirements for speed tests.	Provider has countervailing speed test evidence showing sufficient speed—e.g., from their own network management system. <sup>12</sup>
L	Latency	The round-trip latency of the broadband service exceeds 100ms. <sup>13</sup>	Speed test by subscriber showing the excessive latency.	Provider has countervailing speed test evidence showing latency at or below 100ms—e.g., from their own network management system or the CAF performance measurements. <sup>14</sup>
D	Data cap	The only service plans marketed to consumers impose an unreasonable capacity allowance (“data	Screenshot of provider webpage. Service description provided to 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.

<sup>11</sup> The Challenge Portal must gather information on the subscription tier of the household submitting the challenge. Only locations with a subscribed-to service of 100/20 Mbps or above can challenge locations as underserved. Speed challenges that do not change the status of a location do not need to be considered. For example, a challenge showing that a location only receives 250 Mbps download speed even though the household has subscribed to gigabit service can be disregarded, since it will not change the status of the location to unserved or underserved.

<sup>12</sup> As described in the NOFO, a provider’s countervailing speed test should show that 80 percent of a provider’s download and upload measurements are at or above 80 percent of the required speed. See *Performance Measures Order*, 33 FCC Rcd at 6528, para. 51. See BEAD NOFO at 65, n. 80, Section IV.C.2.a.

<sup>13</sup> *Performance Measures Order*, including provisions for providers in non-contiguous areas (§21).

<sup>14</sup> Ibid.



Code	Challenge type	Description	Evidence: Specific examples	Permissible rebuttals
		cap”) on the consumer. <sup>15</sup>		
T	Technology	The technology indicated for this location is incorrect.	Manufacturer and model number of residential gateway (CPE) that demonstrates the service is delivered via a specific technology.	Provider has countervailing evidence from their network management system showing an appropriate residential gateway that matches the provided service.
B	Business service only	The location is residential, but the service offered is marketed or available only to businesses.	Screenshot of provider webpage.	Provider documentation that the service listed in the BDC is available at the location and is marketed to consumers.
E	Enforceable commitment	The challenger has knowledge that broadband will be deployed at this location by the date established in the deployment obligation.	Enforceable commitment by service provider (e.g., authorization letter). In the case of Tribal Lands, the challenger must submit the requisite legally binding agreement between the relevant Tribal Government and the service provider for the location(s) at issue. (See Section 6.2 above.)	Documentation that the provider has defaulted on the commitment or is otherwise unable to meet the commitment (e.g., is no longer a going concern).
P	Planned (or existing) service	The challenger has knowledge that broadband will be deployed at this location	For planned service: Construction contracts or similar evidence of on-going deployment, along with	Documentation showing that the provider is no longer able to meet the commitment (e.g., is no longer a going concern) or

<sup>15</sup> An unreasonable capacity allowance is defined as a data cap that falls below the monthly capacity allowance of 600 GB listed in the FCC 2023 Urban Rate Survey (FCC Public Notice DA 22-1338, December 16, 2022). Alternative plans without unreasonable data caps cannot be business-oriented plans that are not commonly sold to residential locations. A successful challenge may not change the status of the location to unserved or underserved if the same provider offers a service plan without an unreasonable capacity allowance, or if another provider offers reliable broadband service at that location.

Code	Challenge type	Description	Evidence: Specific examples	Permissible rebuttals
		<p>by June 30, 2024, without an enforceable commitment, or a provider is building out broadband that offers performance beyond the requirements of an enforceable commitment.</p> <p>OR Location has existing service available that is not currently reflected in the availability data.</p>	<p>evidence that all necessary permits have been applied for or obtained.</p> <p>Contracts or a similar binding agreement between the Eligible Entity and the provider stating that planned service will meet the BEAD definition and requirements of reliable and qualifying broadband, even if not required by its funding source (i.e., a separate federal grant program), including the expected date when deployment will be completed, which must be on or before June 30, 2024.</p> <p>For existing service:  Provider shows that the location subscribes or has subscribed within the last 12 months, e.g., with a copy of a customer bill.  Evidence that service is now available as a standard installation, e.g., via a copy of an offer sent to the location.</p>	<p>that the planned deployment does not meet the required technology or performance requirements.</p>
N	Not part of enforceable commitment	This location is in an area that is subject to an enforceable commitment to less than 100% of locations, and the location is not covered by that commitment.	Declaration by service provider subject to the enforceable commitment.	

Code	Challenge type	Description	Evidence: Specific examples	Permissible rebuttals
		(See BEAD NOFO at 36, n. 52.)		
C	Location is a CAI	The location should be classified as a CAI.	Evidence that the location falls within the definitions of CAIs set by the Eligible Entity. <sup>16</sup>	Evidence that the location does not fall within the definitions of CAIs set by the Eligible Entity or is no longer in operation.
R	Location is not a CAI	The location is currently labeled as a CAI but is a residence or a non-CAI business, or is no longer in operation.	Evidence that the location does not fall within the definitions of CAIs set by the Eligible Entity or is no longer in operation.	Evidence that the location falls within the definitions of CAIs set by the Eligible Entity or is still operational.

**Challenge Details**

**Speed Test Requirements**

The IOB will accept speed tests as evidence for substantiating challenges and rebuttals.

*Speed tests must be taken no earlier than 60 days prior to the beginning of the Challenge Process, meaning no earlier than December 20, 2023.*

For a challenge using speed test data as evidence to be valid, the location **must conduct three speed tests on three different calendar days**; the days do not have to be consecutive. The median of the three tests (i.e., the second-highest speed of three) is used to trigger a speed-based (S) challenge, for either upload or download. For example, if a location is designated as “served” and subscribes to broadband service of 100 Mbps/20 Mbps, and three speed tests on three different days result in download speed measurements of 105, 102, and 98 Mbps; and upload speed measurements of 18, 26, and 17 Mbps, the speed tests qualify the location for a challenge because the median measured upload speed of 18 Mbps falls within the definition of “underserved.”

Speed tests can take one of the following forms:

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<sup>16</sup> For example, eligibility for FCC e-Rate or Rural Health Care program funding or registration with an appropriate regulatory agency may constitute such evidence, but the Eligible Entity may rely on other reliable evidence that is verifiable by a third party.

1. A reading of the physical line speed provided by the residential gateway (e.g., DSL modem, cable modem [for HFC]).
2. ONT (for FTTH) or fixed-wireless subscriber module.
3. A reading of the speed test available from within the residential gateway web interface.
4. A reading of the speed test found on the service provider's web page.
5. A speed test performed on a laptop or desktop computer within immediate proximity of the residential gateway, using speed test applications from the following list of applications approved by NTIA:
  - Internet Equity Initiative [beadchallenge.org](https://beadchallenge.org)
  - Ookla [speedtest.net](https://speedtest.net)
  - M-lab [Speed Test by Measurement Lab](https://www.measurementlab.net/speed-test)
  - Cloudflare [Internet Speed Test - Measure Network Performance | Cloudflare](https://www.cloudflare.com/learning/network-layer/what-is-internet-speed-test/)
  - Netflix [Fast.com](https://fast.com).

Each speed test measurement must include:

- The time and date the speed test was conducted.
- 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:

- The name and street address of the customer conducting the speed test.
- A certification of the speed tier the customer subscribes to (e.g., a copy of the customer's last invoice or customer attestation of their speed subscription).
- An agreement, using an online form provided by IOB, that grants access to these information elements to the IOB, any contractors supporting the Challenge Process, and the service provider.

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

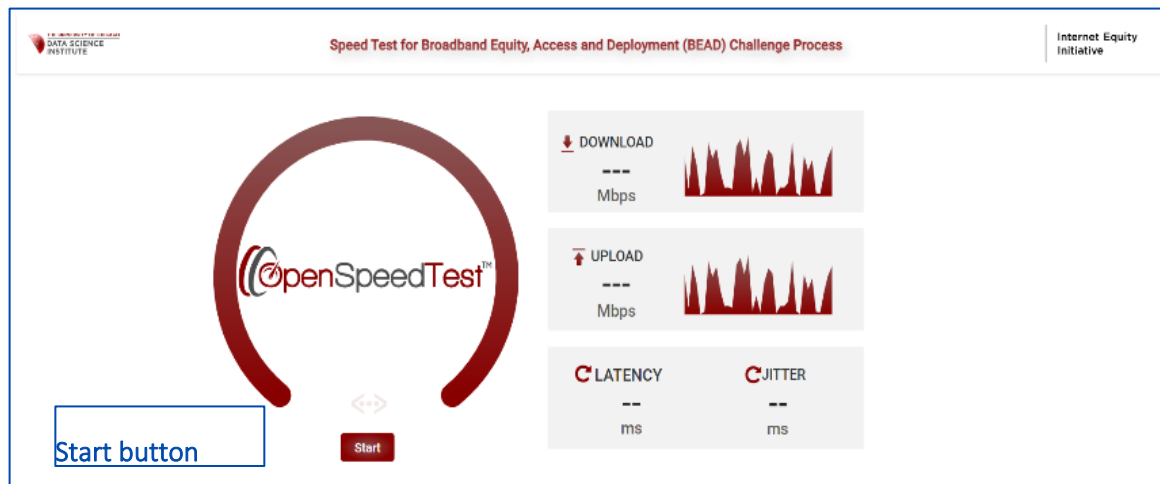
Speed tests may be conducted by individual subscribers, but speed test challenges must be gathered and submitted by an eligible challenger: units of local government, non-profit organizations, or internet service providers. In Illinois, subscribers who use [beadchallenge.org](https://beadchallenge.org) submit their results directly to the Internet Equity Initiative (as a non-profit participating in the Challenge Process) to be submitted as a bulk challenge.

## Using the BEAD Challenge Speed Test by Internet Equity Initiative

Individual internet subscribers can challenge the accuracy of the map of BEAD-eligible locations based on speed and latency. To do so, the user can use the Internet Equity Initiative's speed test tool. As outlined above, the speed tests must be taken three times on three different days. After completing and submitting the first speed test, the Internet Equity Initiative will send reminders to complete the additional two tests on subsequent days, should the user opt in via email.

### Step 1:

- Visit [beadchallenge.org](https://beadchallenge.org).

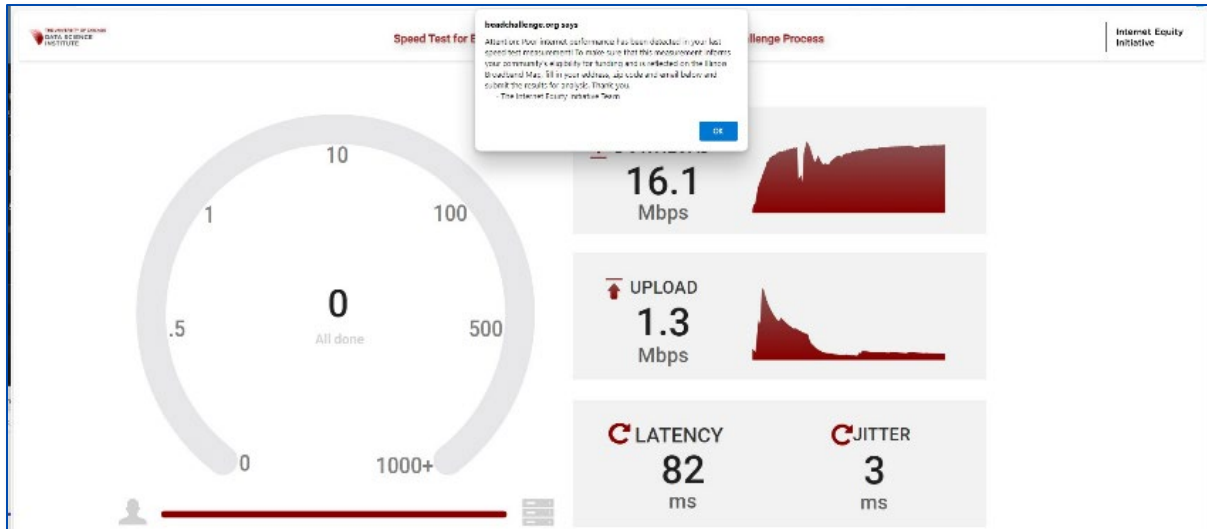


### Step 2:

- Hit the "Start" button to initiate the speed test.

### Step 3:

- If test results fall below the threshold for designation as "served" (100/20 Mbps), a pop-up screen will appear alerting the user that low speeds have been detected.



- If the test finds internet speeds at or above the “served” threshold (100/20 Mbps), but the user has experienced unreliable or variable speeds in the past, the user can still follow the instructions for submitting the results and take two more tests on subsequent days to determine whether the service lags in speed or quality at other times. Users can also take more than three tests over more than three days.

#### Step 4:

- Complete the short form at the bottom of the screen by providing the participant’s name and the street address and zip code for their location. Users should include their unit, apartment, or suite number, as applicable.
- Enter the download and upload speeds of the internet service the user subscribes to; this information can typically be found on the monthly statement, in a description of the service plan on the user’s internet provider’s website or mobile application, or by contacting the provider by phone or chat.

## Submission form

Individual

First Name  Last Name

Email  ZIP Code


Street Number  Street Name

Unit #  City  State

***I attest that I have subscribed for an Internet plan of (Mbps):***

Download Speed  Upload Speed

**Submit**

 **Internet Equity Initiative**

SpeedTest by OpenSpeedTest™ is a Free and Open-Source HTML5 Network Speed Test Software.

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Version 1.0.0-rev30

### Step 5:

- Press “Submit” and return to the website two more times on two different days to repeat the process.
- Note: Completing the form confirms that the individual would like to submit their speed test to the Internet Equity Initiatives. The individual will receive an email, where they can opt in to receive reminder emails to take the speed tests over multiple days. Emails will stop after three speed tests are successfully submitted and the individual can also opt out of receiving the emails at any time.

## Area and MDU Challenges and Rebuttals

If multiple valid challenges of the same type (A, S, L, D, or T) and related to the same technology are submitted for the same provider within a single census block group or a single multi-dwelling unit (MDU), the IOB will administer area and MDU challenges. **In these instances, the burden of proof is placed on the broadband provider** to demonstrate that they meet availability, speed, latency, data cap, and technology requirements for all locations they serve within the area or all units within an MDU. The provider can use any of the permissible rebuttals listed in the Allowable Challenge Types table.

An **area challenge** is triggered if **six or more** broadband-serviceable locations using a particular technology and a single provider within a census block group are challenged.

A **multi-dwelling unit (MDU) challenge**, will be triggered when the following number of challenges are submitted within the same MDU:

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

An MDU challenge is counted as an area challenge.

Each type of challenge and each technology and provider is considered separately. For example, an availability challenge (A) does not count toward reaching the area threshold for a speed (S) challenge. In addition, if a provider offers multiple technologies, such as DSL and fiber, each is treated separately since they are likely to have different availability and performance.

Area challenges related to availability need to be rebutted in entirety or by location with evidence that service is available for all BSLs within the census block group—e.g., by network diagrams that show fiber or HFC infrastructure or by subscriber information.

- For fixed-wireless service, the challenge system will offer a representative random sample—no fewer than 10—of the area where the provider must demonstrate service availability and speed (e.g., with a mobile test unit).
- For MDU challenges, the rebuttal must show that the inside wiring is reaching all units and is of sufficient quality to support the claimed level of service.

A service provider may rebut an area speed test challenge by providing speed tests in the manner described in the Speed Test Requirements section above for at least 10 percent of the customers in the challenged area.

- The customers must be randomly selected.
- Providers must apply the 80/80 rule—i.e., 80 percent of these locations must experience a speed that equals or exceeds 80 percent of the speed threshold. For example, to meet



the 25/3 Mbps threshold, 80 percent of these locations must have a download speed of at least 20 Mbps (that is, 80 percent of 25 Mbps) and an upload speed of at least 2.4 Mbps; to meet the 100/20 Mbps speed tier, they must have a download speed of at least 80 Mbps and an upload speed of 16 Mbps.

- Only speed tests conducted by the provider between the hours of 7–11:00 p.m. local time will be considered as evidence for a challenge rebuttal.

### **Minimum level of evidence sufficient to establish a challenge**

The minimum level of evidence sufficient to establish a challenge is as follows:

- The Illinois BEAD Challenge Portal will verify that the Location ID provided can be found in the FCC Fabric Data and is a BSL.
- The Illinois BEAD Challenge Portal will verify that the CAI ID provided can be found in the list of CAIs published by the IOB.
- The Illinois BEAD Challenge Portal will confirm that the challenged service is listed in the National Broadband Map and meets the definition of reliable broadband service.
- For scanned images, the Illinois BEAD Challenge Portal will determine whether the quality is sufficient to enable optical character recognition (OCR).
- For availability challenges, the IOB will manually verify that the evidence submitted falls within the categories stated in the NTIA BEAD Challenge Process Policy Notice and that the document is unredacted and dated.

# V How to use the Illinois BEAD Challenge Portal


## Register to Participate in Challenge Process

All eligible challengers that wish to participate in the Challenge Process and access the Illinois BEAD Challenge Portal must pre-register at <https://go.illinois.edu/BEADChallengePreregistration>.


Once a registration is submitted, the IOB will verify the requesting entity's eligibility and will then send an email confirming the entity's registration. Updates regarding launches of the BEAD Challenge Map and Illinois BEAD Challenge Portal, as well as training webinars and resources, will be sent to pre-registered challengers.

**Pre-registration in advance of the challenge process is recommended** but will also be accepted during the challenge window. Pre-registration will close five days prior to the close of the Challenge Phase on **March 13 at 5 pm CT**. Prior to the challenge portal opening, verified pre-registrations will receive an email with instructions to create login credentials to the BEAD Challenge Portal. The pre-registration process will re-open during the Rebuttal Phase, and similarly close again five days prior to the close of the Rebuttal Phase.

English ▾



**ILLINOIS  
BROADBAND  
LAB**



**Illinois  
Department of Commerce  
& Economic Opportunity**  
JB Pritzker, Governor

Welcome to pre-registration for the Illinois Broadband Equity Access and Deployment (BEAD) Challenge Process. By participating in the challenge process, you are helping to make the Illinois Broadband Map accurate. You're also helping to identify your community's broadband needs!

The Illinois BEAD Challenge Process portal will open in early 2024. If you are completing this form as a non-profit, government entity, or internet service provider, you will be emailed a user name and password that you can use to log in to the challenge portal.

If you are an individual, please complete this form to receive communication about how you can participate in the challenge process. The information you provide will **ONLY** be used to communicate with you about the Illinois BEAD State-Level Challenge Process and will not be sold or shared.

Who is completing this form?

Non-profit (Including Community-Based Organizations and Anchor Institutions)
  Broadband Provider
  Government Organization
  Individual

The following information is required to complete the pre-registration form (as shown in the screenshot above):

- **For all respondents:** Contact information, including name, phone number, email, and job title.
- **For non-profit organizations:** Organization name, Employer Identification Number (EIN), website, and address.
- **For internet service providers:** Company name, FCC registration number (FRN), confirmation of service in the state of Illinois (current or planned), and address.
- **For units of local government:** Agency name, website, organization type (e.g., municipality, township, county, library), and address.

- **For individual residents**<sup>17</sup>: Current internet service provider and email opt-in. (Note that individual residents can pre-register to receive updated information about the Challenge Process, but will **not** receive login credentials since they are not an eligible challenger.)

### Preparing to Submit Challenges

Challenges to a Broadband Serviceable Location requires a Location ID. Some challengers may have access to the FCC Fabric Data, which includes this information. Others may use the BEAD Challenge Map to search for locations and pull the Location ID from there, or complete a challenge directly from the BEAD Challenge Map: [bead.connectednation.org/illinois](https://bead.connectednation.org/illinois)

A challenge to a Community Anchor Institution (CAI) requires a CAI ID, which can be found in the [CSV listing All CAIs](#) or by clicking on a CAI on the BEAD Challenge Map.

#### **A challenge can be linked to an eligible location in two ways:**

(1) By selecting a location or area through the BEAD Challenge Map (especially for those without FCC Fabric licenses), and (2) By accessing Location IDs by using the FCC Fabric Data (or CAI IDs using the [All CAIs data](#)) and submitting a single or bulk challenge. Read on for a breakdown of each option.

#### **Option 1: Selecting a location or area through the BEAD Challenge Map**

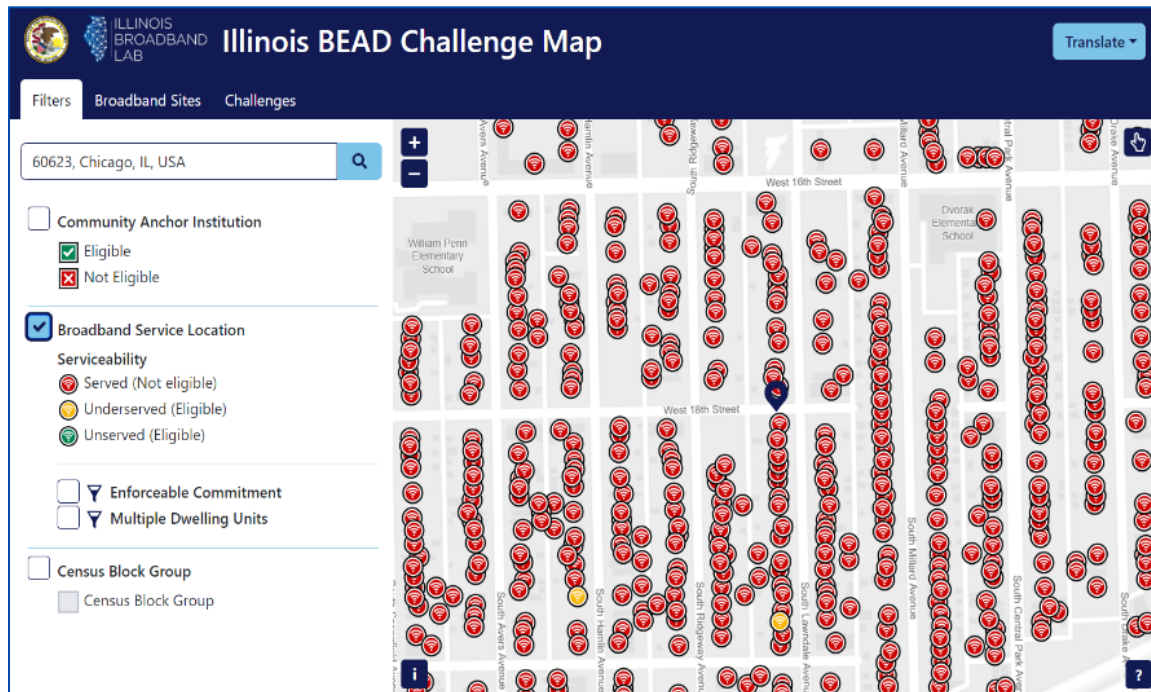
**Step 1:** Navigate to the BEAD Challenge Map home page to search for locations, view the broadband service options reported, and check eligibility.

- Search for an address or locate an area on the map using the zoom function.
- Click on a location to view the availability of broadband and whether this location is currently eligible for BEAD funding.

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<sup>17</sup> While federal NTIA rules do not allow individuals to submit challenges directly, residents can help identify inaccuracies and work with nonprofits or local governments to challenge the maps.

- Toggle through filters for community anchor institutions, broadband serviceable locations, and census block groups to select specific types of locations. Please see a summary of the available filters and symbology below.



#### Available filters include:

- I. If a **community anchor institution (CAI)** is...
  - a. **Green**, it is eligible for funding because it has been designated as unserved (without access to 1 Gbps symmetrical service).
  - b. **Red**, it is not eligible for funding because it has been designated as served (with access to 1 Gbps symmetrical service).
- II. If a **broadband-serviceable location (BSL)** is...
  - a. **Green** or **Yellow**, it is eligible for funding because it has been designated as unserved or underserved.
  - b. **Red**, it is not eligible for funding because it has been designated as served.
- III. By selecting the Enforceable Commitment filter, users will see locations that are confirmed to be served by federal or state funding sources.
  - a. The Enforceable Commitment status overrides a location's current availability status.
  - b. For example, if a location is currently underserved, but following the implementation of a grant program, it will be served by >100/20 Mbps wireline or licensed fixed wireless, then it will appear as **red** (not eligible for funding).

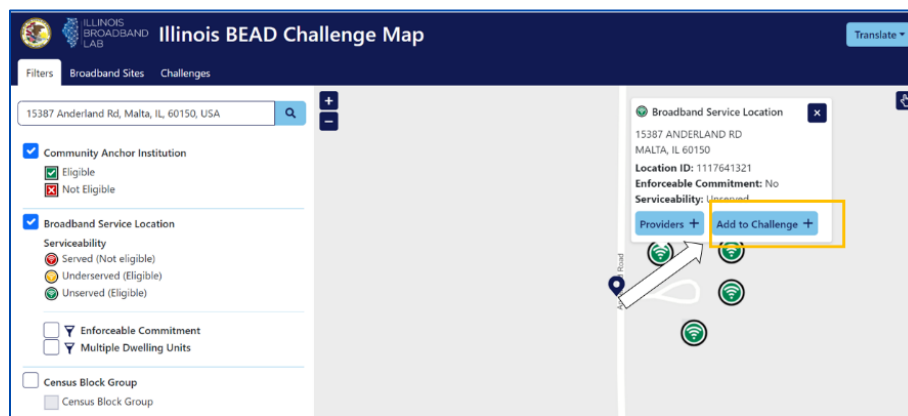
IV. By selecting the **multi-dwelling units** filter, users will see MDUs (residential buildings with two or more units). The color scheme follows the pattern of other BSLs:

- a. **Green** or **Yellow** means that it is eligible for funding because it has been designated as unserved or underserved.
- b. **Red** means that it is not eligible because it has been designated as served.

**Step 2:** If the user believes the information is inaccurate, initiate a challenge.

Within the map, there are three ways to select a location(s) to challenge:

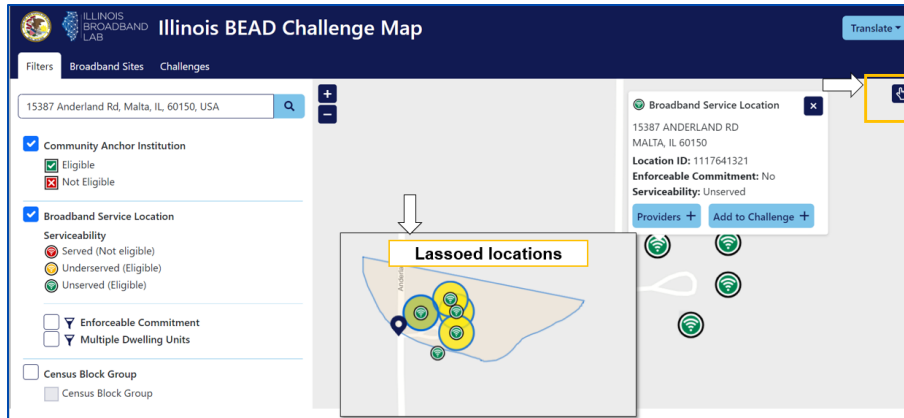
Method 1: Search for a location, click on it, and then click “Add to Challenge.”



Method 2: After you’ve zoomed in on a location and locations are listed on the Broadband Sites left-hand panel, click on “Add to Challenge.”



Method 3: Use the “Select” tool to select multiple individual locations at once. The user can also use it as a “lasso” tool to select multiple locations. (Note: The user can remove locations from this selection by clicking on them.)

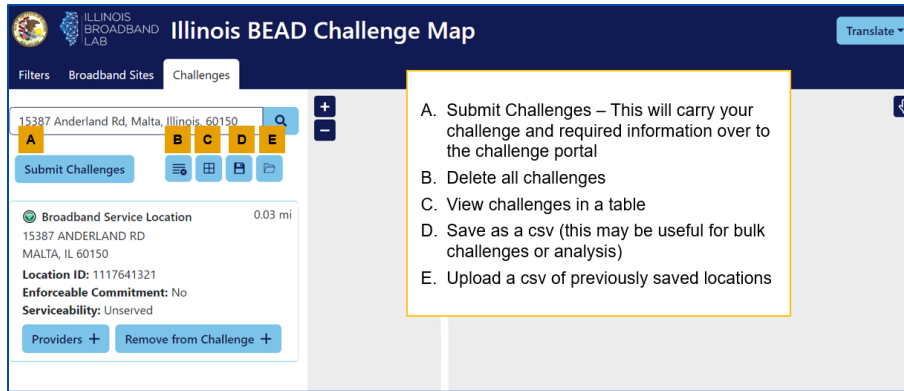


Once location(s) have been added to a challenge, the user can view them in the “Challenges” tab.



### Step 3: Submit challenge(s).

- Once the user has finished the selection process, they may click the “Submit Challenges” button (denoted by “A” in the figure below). The user will then be forwarded to the Challenge Portal to upload evidence and complete the challenge submission process.
- There is no limit or minimum to the number of locations a user can select to challenge, or number of times a user can submit challenges.
- To delete all saved challenges, the user can click the button denoted by “B” below.
- To view challenges in a table format, the user can click the button denoted by “C” below.
- Users can click on the button below denoted by “D” (i.e., second button from the right, indicated by the floppy disk icon) to download saved location(s) as a CSV. This CSV can be uploaded to the Map later to access the same locations (denoted by “E” below) or referenced to support bulk challenges (detailed in the next section).



## Option 2: Bulk challenge CSV templates

Use the FCC Fabric Data to gather Location IDs for challenges, and fill out the CSV template for the desired challenge type.

- The IOB has created 10 CSV templates, specific to the challenge types. All CSVs can be accessed for download at [DCEO.illinois.gov/BEADchallenge](https://DCEO.illinois.gov/BEADchallenge) and on the Challenge Portal under Bulk Challenges. The CSVs and associated challenge types include:
  - Availability.csv: Availability (Type A)
  - Speed.csv: Speed (Type S)
  - Latency.csv: Latency (Type L)
  - Data\_cap.csv: Data Cap (Type D)
  - Planned\_or\_existing\_service.csv: Planned (or existing) Service (Type P)
  - Is\_an\_enforceable\_commitment.csv: Enforceable Commitment (Type E)
  - Is\_not\_an\_enforceable\_commitment.csv: Not part of an Enforceable Commitment (N)
  - Is\_a\_cai.csv: Location is a CAI (Type C)
  - Is\_not\_a\_cai.csv: Location is not a CAI (Type R)
  - All\_others.csv: Technology (Type T) and Business Service Only (Type B)

Table 3 below details the relevant fields for each CSV file.



**Table 3: Submission columns/fields for each CSV challenge submission template**

Challenge type	Column name in CSV	Description	Where to find this information
Availability (Type A)—broadband service is not offered at the location	challenge_type	The single letter code to represent the challenge type (A)	See Appendix 5: Challenge Type Codes for details.
	location_or_cai_id	Unique identifier for the location from the FCC Fabric or CAI list (Location ID for households & businesses; CAI ID for CAIs)	BEAD Challenge Map, FCC Fabric Data, or All CAI list
	fcc_provider_id	A unique 6-digit code generated by the FCC that identifies each service provider	See Appendix 3: FCC Provider IDs for details.
	technology_code	Code for the technology of the service being challenged, as shown on the Broadband Map	See Appendix 1: Technology Codes for details.
	residential_or_business	Based on the type of service being challenged, enter R if residential or B if business	Challenger decision
	building_unit	[OPTIONAL, only include if applicable] The unit, apartment, or suite number, if applicable. If included,	The address of the building

Challenge type	Column name in CSV	Description	Where to find this information
		challenge only applies to specific unit.	
	reason_code	Reason codes relevant to the challenge type A	See Appendix 2: Availability Category Codes for details.
Speed (Type S)—the actual speed of the service tier falls below the unserved (25/3 Mbps) or underserved (100/20 Mbps) thresholds	challenge_type	The single letter code to represent the challenge type (S)	See Appendix 5: Challenge Type Codes for details.
	location_or_cai_id	Unique identifier for the location from the FCC Fabric or CAI list (Location ID for households & businesses; CAI ID for CAIs)	BEAD Challenge Map, FCC Fabric Data, or All CAI list
	fcc_provider_id	A unique 6-digit code generated by the FCC that identifies each service provider	See Appendix 3: FCC Provider IDs for details.
	technology_code	Code for the technology of the service being challenged, as shown on the Broadband Map	See Appendix 1: Technology Codes for details.
	residential_or_business	Based on the type of service being challenged, enter R if residential or B if business	Challenger decision

Challenge type	Column name in CSV	Description	Where to find this information
	building_unit	[OPTIONAL, only include if applicable] The unit, apartment, or suite number, if applicable. If included, challenge only applies to specific unit.	The address of the building
	measured_download_speed	Download speed in megabits per second as measured through a speed test using BEADchallenge.org or other test platform	Result of a speed test (BEADchallenge.org or other test platform)
	measured_upload_speed	Upload speed in megabits per second as measured through a speed test using BEADchallenge.org or other test platform	Result of a speed test (BEADchallenge.org or other test platform)
Latency (Type L)—the round-trip latency of the broadband service exceeds 100 ms	challenge_type	The single letter code to represent the challenge type (L)	See Appendix 5: Challenge Type Codes for details.
	location_or_cai_id	Unique identifier for the location from the FCC Fabric or CAI list (Location ID for households & businesses; CAI ID for CAIs)	BEAD Challenge Map, FCC Fabric Data, or All CAI list

Challenge type	Column name in CSV	Description	Where to find this information
	fcc_provider_id	A unique 6-digit code generated by the FCC that identifies each service provider	See Appendix 3: FCC Provider IDs for details.
	technology_code	Code for the technology of the service being challenged, as shown on the Broadband Map	See Appendix 1: Technology Codes for details.
	residential_or_business	Based on the type of service being challenged, enter R if residential or B if business	Challenger decision
	building_unit	[OPTIONAL, only include if applicable] The unit, apartment, or suite number, if applicable. If included, challenge only applies to specific unit.	The address of the building
	measured_latency	The latency as measured through a speed test in milliseconds (ms)	Displays on the results of a speed test (BEADchallenge.org or other test platform)
Data Cap (Type D)—the only service plans marketed to	challenge_type	The single letter code to represent the challenge type (D)	See Appendix 5: Challenge Type Codes for details.

Challenge type	Column name in CSV	Description	Where to find this information
consumers impose an unreasonable capacity allowance (“data cap”) on the consumer.	location_or_cai_id	Unique identifier for the location from the FCC Fabric or CAI list (Location ID for households & businesses; CAI ID for CAIs)	BEAD Challenge Map, FCC Fabric Data, or All CAI list
	fcc_provider_id	A unique 6-digit code generated by the FCC that identifies each service provider	See Appendix 3: FCC Provider IDs for details.
	technology_code	Code for the technology of the service being challenged, as shown on the Broadband Map	See Appendix 1: Technology Codes for details.
	residential_or_business	Based on the type of service being challenged, enter R if residential or B if business	Challenger decision
	building_unit	[OPTIONAL, only include if applicable] The unit, apartment, or suite number, if applicable. If included, challenge only applies to specific unit.	The address of the building

Challenge type	Column name in CSV	Description	Where to find this information
Planned or existing service (Type P)—the challenger has knowledge that broadband will be deployed at this location by June 30, 2024, without an enforceable commitment or a provider is building out broadband offering performance beyond the requirements of an enforceable commitment. Also, use for instances if location has existing service available that is not currently reflected in the availability data.	challenge_type	The single letter code to represent the challenge type (P)	See Appendix 5: Challenge Type Codes for details.
	planned_or_existing	Based on the challenge, enter P if the challenge is for planned service or E if challenge is for existing service	Challenger knowledge
	location_or_cai_id	Unique identifier for the location from the FCC Fabric or CAI list (Location ID for households & businesses; CAI ID for CAIs)	BEAD Challenge Map, FCC Fabric Data, or All CAI list
	fcc_provider_id	A unique 6-digit code generated by the FCC that identifies each service provider	See Appendix 3: FCC Provider IDs for details.
	technology_code	Code for the technology of the service being challenged, as shown on the Broadband Map	See Appendix 1: Technology Codes for details.

Challenge type	Column name in CSV	Description	Where to find this information
	residential_or_business	Based on the type of service being challenged, enter R if residential or B if business	Challenger decision
	planned_download_speed	Download speed in megabits per second (Mbps) that will be made available by the internet service provider at this location by June 30, 2024, or already exists at the location	Based on the Internet Service Provider's Network capabilities and service offerings
	planned_upload_speed	Upload speed in megabits per second (Mbps) that will be made available by the internet service provider at this location by June 30, 2024, or already exists at the location	Based on the Internet Service Provider's Network capabilities and service offerings
Enforceable Commitment (Type E)—the challenger has knowledge that broadband will be deployed at this location by the date established in the	challenge_type	The single letter code to represent the challenge type (E)	See Appendix 5: Challenge Type Codes for details.
	location_or_cai_id	Unique identifier for the location from the FCC Fabric or CAI list (Location ID for households & businesses; CAI ID for CAIs)	BEAD Challenge Map, FCC Fabric Data, or All CAI list

Challenge type	Column name in CSV	Description	Where to find this information
deployment obligation.	fcc_provider_id	A unique 6-digit code generated by the FCC that identifies each service provider	See Appendix 3: FCC Provider IDs for details.
	technology_code	Code for the technology of the service being challenged, as shown on the Broadband Map	See Appendix 1: Technology Codes for details.
	residential_or_business	Based on the type of service being challenged, enter R if residential or B if business	Challenger decision
	enforceable_commitment_program_name	Include the name of the federal or state program under which this location will be served per BEAD's minimum technology and speed requirements	Challenger decision
	committed_download_speed	Download speed in megabits per second (Mbps) that the internet service provider has committed to offering at the location based on the terms of the respective federal or state grant program that meets BEAD's minimum	Federal or State grant program agreement document



Challenge type	Column name in CSV	Description	Where to find this information
		technology and speed requirements	
	committed_upload_speed	Upload speed in megabits per second (Mbps) that the internet service provider has committed to offering at the location based on the terms of the respective federal or state grant program that meets BEAD's minimum technology and speed requirements	Federal or State grant program agreement document
Location is a CAI (Type C)—the location should be classified as a CAI.	challenge_type	The single letter code to represent the challenge type (C)	See Appendix 5: Challenge Type Codes for details.
	cai_type	The CAI type of the entity <b>denoted by one letter, from Column B (CAI Type) in the <a href="#">All CAI list</a></b> , including: <ul style="list-style-type: none"> <li>• Schools</li> <li>• Libraries</li> <li>• Medical providers</li> <li>• Public safety entities</li> <li>• Public housing organizations</li> </ul>	BEAD Challenge Map or All CAI list. Also, see Appendix 6: CAI Type Codes

Challenge type	Column name in CSV	Description	Where to find this information
		<ul style="list-style-type: none"> <li>• Nonprofits / Community-based organizations</li> <li>• Local government</li> <li>• Parks</li> </ul>	
	entity_name	Name of the entity that is being challenged	Challenger knowledge
	street_address	The street address of the entity that is being challenged	Address of CAI
	city	The city of the entity that is being challenged	Address of CAI
	state	The state of the entity that is being challenged	Address of CAI
	zip_code	The zip code of the entity that is being challenged	Address of CAI
	category_code	Select the category code that best describes why the challenged location should be listed as a CAI	Appendix 4: CAI Category Codes (Table 7) for details
	explanation	Describe why the challenged location should be listed as a CAI	Challenger explanation. Note: Please do not use commas in your explanation and keep it on one line in the CSV (this will impact how the data is read by the system)

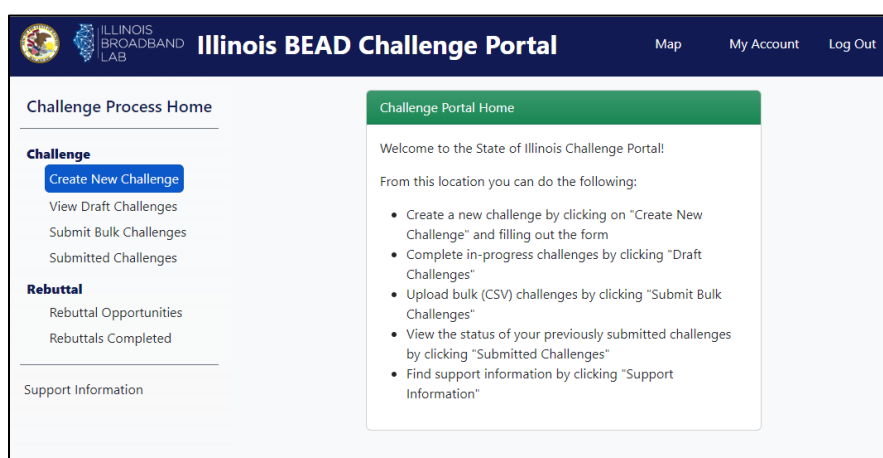
Challenge type	Column name in CSV	Description	Where to find this information
Location is not a CAI (Type R) — the location is currently labeled as a CAI but is a residence, a non-CAI business, or is no longer in operation.	challenge_type	The single letter code to represent the challenge type (R)	See Appendix 5: Challenge Type Codes for details.
	cai_id	Unique identifier for the CAI location	Illinois BEAD Challenge Map or All CAI list
	entity_name	Entity name from the CAI or BEAD Challenge Map that is being challenged	Illinois BEAD Challenge Map or All CAI list
	category_code	Select the category that best describes why the challenged location should NOT be listed as a CAI	See Appendix 4: CAI Category Codes (Table 8) for details.
	explanation	Describe why the challenged location should not be listed as a CAI	Challenger explanation. Note: Please do not use commas in your explanation and keep it on one line in the CSV (this will impact how the data is read by the system)
Technology (Type T) and Business Service Only (Type B): Technology (T)—the technology indicated at this location for	challenge_type	The single letter code to represent the challenge type (T for Technology and B for Business Service Only)	See Appendix 5: Challenge Type Codes for details.
	location_or_cai_id	Unique identifier for the location from the FCC Fabric or CAI list (Location ID for	BEAD Challenge Map, FCC Fabric Data, or All CAI list

Challenge type	Column name in CSV	Description	Where to find this information
the specific ISP is incorrect.		households & businesses; CAI ID for CAIs)	
Business Service Only (B)—the location is residential, but the service offered is marketed or available only to businesses.	fcc_provider_id	A unique 6-digit code generated by the FCC that identifies each service provider	See Appendix 3: FCC Provider IDs for details.
	technology_code	Code for the technology of the service being challenged, as shown on the Broadband Map	See Appendix 1: Technology Codes for details.
	residential_or_business	Based on the type of service being challenged, enter R if residential or B if business	Challenger decision

## Creating and Submitting Challenges in the Illinois BEAD Challenge Portal

After selecting locations from the BEAD Challenge Map or using the FCC Fabric and [Fixed Availability](#) Data to prepare a bulk challenge CSV(s), navigate to the BEAD Challenge Portal (link will be available on [DCEO.illinois.gov/BEADchallenge](https://DCEO.illinois.gov/BEADchallenge)) to begin.

**Logging In:** Verified pre-registered users will receive an email from [broadband@illinois.gov](mailto:broadband@illinois.gov) inviting them to create an account with their pre-registered email address. This email will prompt the user to click on a link, where they will be taken to the portal to create a password. After they create their password, they will receive an email from [verification@illinoisbroadbandmapping.org](mailto:verification@illinoisbroadbandmapping.org) to confirm their account. Once this is complete, the user will be able to log into their account on the Portal to create a challenge.



**Create a New Challenge:** Click on Create a New Challenge to create a new single challenge. Fill out the requested fields and click Save. Users can refer to Table 3 or [this reference guide](#) for instructions for completing each field.

**Draft Challenges:** Click on View Draft Challenges to view saved challenges which have not yet been submitted.

To complete a submission, complete the following for each row in the table:

- Click on "Edit" to add the required details for the challenge.
- Click on "Add Evidence" to add the evidence. Evidence must be a PDF, .png, .jpeg, .zip, or .gif file type and <1 GB in size. For guidance on acceptable evidence, please visit this [reference guide](#).
- Click on "Submit" to submit your challenge.

**Submit Bulk Challenges:** To submit a bulk challenge, click on Submit Bulk Challenges. Download the assigned CSV template in the "CSV" template column on this page and complete the CSV. (To

understand what information belongs in each column, users can access [this reference document](#) or refer to Table 3 in the User Guide.) Then, upload the CSV to the respective Challenge Type row. If the submission includes challenges against multiple providers, the portal will group the bulk challenges by provider. Finally, upload evidence for each challenge type and provider. Then, submit the challenge.

*Important Reminder: All challenges within one bulk challenge CSV must all be the same challenge type.*

**Submitted Challenges:** Click on Submitted Challenges to view challenges that the user has already submitted. Once a challenge has been submitted it is no longer editable, though users can view it by clicking the view button. After submitting a challenge, it will be reviewed and verified by the Office of Broadband, and then posted publicly during the Rebuttal Phase. Personally identifiable information (PII) will be kept confidential, including subscriber name, street address, and IP address. If a challenge is missing key components or the IOB has a question, the IOB may follow up with the challenger via email or phone.

**Support Information:** Click on Support Information to find answers to common questions, join technical assistance office hours, and contact the Illinois Office of Broadband. The Illinois Office of Broadband will be hosting office hours twice per week during the challenge window, hosting weekly webinars, and answering questions via email.

For up-to-date support details, please visit [this document](#).

### Submitting Rebuttals

**Eligible challengers will receive notifications of opportunities to submit rebuttals.**

- When the Rebuttal Phase opens, notifications will be sent to eligible challengers as formal notice that the challenges are open for rebuttal. Eligible challengers will be notified of the opportunity to submit rebuttals for Planned Service, Enforceable Commitment, Location Is a CAI, and Location is not a CAI challenge types. (These challenge types include any challenge not submitted directly against a provider.) Rebuttals can be submitted by internet service providers, non-profits, and units of local government.
- **For ISP rebuttals**, in addition to the standard notification, the internet service provider's notification will indicate whether challenges have been submitted to their service. Only ISPs that have been challenged will receive this information through the Challenge Portal. For challenges related to location eligibility, only the challenged internet service provider may rebut the reclassification of a location or area with evidence.

- **For all other rebuttals**, an eligible challenger can go into the BEAD Challenge Map, view challenges, and then submit a rebuttal, including evidence, for challenges eligible for rebuttal.
- If a provider claims 1 Gbps symmetrical service availability for a CAI, or a unit of local government disputes a location's CAI status, the CAI or any eligible challenger may rebut.
- If an ISP submits a Planned Service or Enforceable Commitment challenge type, any eligible challenger can rebut.
- All challenges will be published on the BEAD Challenge Map, where eligible challengers can select location(s) to rebut, based on the challenge type.

## VI Additional resources

For a complete list of additional resources for the BEAD Challenge Process, please visit the Illinois Office of Broadband BEAD Challenge Process website at [DCEO.illinois.gov/BEADchallenge](https://DCEO.illinois.gov/BEADchallenge).

### BEAD Map Challenge Process

#### Background

Illinois was awarded \$1.04 billion in federal Broadband Equity, Access, and Deployment (BEAD) Program funds by the National Telecommunications and Information Administration (NTIA) to continue our efforts to connect all homes and businesses to modern high-speed internet.

The BEAD Program rules require states to prioritize funds in this order:

1. Connect unserved locations (available service is 25/3 megabits per second or less)
2. Connect underserved locations (available service is at least 25/3 mbps but less than 100/20 mbps)
3. Connect Community Anchor Institutions to gigabit symmetrical service (1,000/1,000 mbps)

#### Challenge Process

*Let's get the map right!*

##### **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](https://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.

**Help us make sure BEAD dollars go where they are needed most!**

The website includes key links relevant to the Challenge Process:

- Pre-registration form for Challenge Process <https://go.illinois.edu/BEADChallengePreregistration>
- Internet Equity Initiative Speed Test [beadchallenge.org](https://beadchallenge.org)
- BEAD Challenge Map [bead.connectednation.org/illinois](https://bead.connectednation.org/illinois)

Participants may also find additional helpful resources on the [website](#), such as:

- Weekly BEAD Challenge Process Webinar registration <https://registration.extension.illinois.edu/start/bead-challenge-process-lunch-and-learns>



- BEAD Challenge Process Webinar recordings
- BEAD Challenge Process Webinar presentations
- BEAD Challenge Community Outreach Toolkit
- Illinois BEAD Initial Proposal, Volume 1, outlining the state’s Challenge Process
- Illinois Five-Year Action Plan

If you have any additional questions, please reach out to [broadband@illinois.gov](mailto:broadband@illinois.gov) and include “Challenge Process” in the subject line.

# Appendix 1: Technology Codes

Table 4: Technology Codes<sup>18</sup>

Technology Code	Technology	Definition / Examples
10	Copper Wire	Fixed wireline service using copper wire (e.g., Asymmetric or Symmetric DSL, ethernet over copper, T-1, etc.)
40	Coaxial Cable	Fixed wireline service using coaxial cable or hybrid fiber-coaxial (e.g., DOCSISx)
50	Optical Carrier / Fiber to the Premises	Fixed wireline service using fiber to the home or business end user, but does not include "fiber to the curb"
60*	Geostationary Satellite	Fixed non-terrestrial wireless service using satellites in geostationary orbit (i.e., Geostationary Earth Orbit)
61*	Non-Geostationary Satellite	Fixed non-terrestrial wireless service using satellites in non-geostationary orbit (i.e., Low Earth Orbit or Medium Earth Orbit)
70*	Unlicensed Terrestrial Fixed Wireless	Fixed terrestrial wireless service using entirely unlicensed spectrum, including services provided over WiFi as a fixed solution
71	Licensed Terrestrial Fixed Wireless	<ul style="list-style-type: none"> <li>Fixed terrestrial wireless service using entirely licensed spectrum (including priority access licenses in the 3.5 GHz band) or a hybrid of licensed, unlicensed, and licensed-by-rule spectrum to make last-mile connections to fixed locations</li> <li>This includes service provided over a 4G LTE or 5G-NR mobile network but sold as a fixed solution</li> <li>Providers that use licensed microwave spectrum for backhaul but otherwise use unlicensed or licensed-by-rule spectrum for last-mile connections to end users may not use this technology code</li> </ul>
72	Licensed-by-Rule Terrestrial Fixed Wireless	<ul style="list-style-type: none"> <li>Fixed terrestrial wireless services using entirely licensed-by-rule spectrum or a hybrid of licensed-</li> </ul>

<sup>18</sup> <https://help.bdc.fcc.gov/hc/en-us/articles/5290793888795-Fixed-Technology-Codes->

		by-rule and unlicensed spectrum to make last-mile connections to fixed locations <ul style="list-style-type: none"> <li>• Licensed-by-rule spectrum users include operators providing last-mile connections through general authorized access (GAA) in the 3.5 GHz Citizens Broadband Radio Service (CBRS) band</li> </ul>
0*	Other	Fixed service using any other technology not otherwise detailed for another code

*\* These technology codes do not qualify as reliable broadband technology, per NTIA guidance. Given this, they are not eligible to challenge.*

## Appendix 2: Availability Category Codes

Table 5: Reason codes for Challenge Type of Availability (A) drawn from the FCC Broadband Data Collection: Data Specifications for Bulk Fixed Availability Challenge and Crowdsourcing Data.<sup>19</sup>

Reason code	Description
1	Provider failed to schedule a service installation within 10 business days of a request.
2	Provider did not install the service at the agreed-upon time.
3	Provider requested more than the standard installation fee to connect the location.
4	Provider denied the request for service.
5	Provider does not offer the technology at the location.
6	Provider does not offer the speed(s) shown on the Broadband Map for purchase at this location.
8	No wireless or satellite signal is available at the location.
9	New, non-standard equipment is required to connect the location.

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<sup>19</sup> FCC Broadband Data Collection: [Data Specifications for Bulk Fixed Availability Challenge and Crowdsourcing Data](#)

## Appendix 3: FCC Provider IDs

Table 5: List of Provider IDs and Provider Names for bulk CSV submission

Provider ID	Brand Name	Affiliations	Offers reliable broadband technology? (Per NTIA definition)
190501	4 SIWI LLC   4 SIWI LLC	4 SIWI LLC	Yes
130012	Adams Telephone Co-Operative   Adams Telsystems Inc.	Adams Telephone Co-Operative	Yes
360115	AirCell	AIRCELL Inc.	Yes
130036	Alhambra-Grantfork Telephone Company   Allpoint NetworX, Inc.	Alhambra-Grantfork Communications, Inc.	Yes
130079	Astound_Broadband	Radiate Holdings, LP	Yes
130077	AT&T Inc	AT&T Inc.	Yes
280005	Aureon Communications, L.L.C.	Aureon Network Services Inc.	Yes
130119	Bergen Telephone Company	Bergen Telephone Company	Yes
200006	BLIP Networks	Blip Networks, LLC	Yes
300002	Bluebird Network LLC	Bluebird Network, LLC	Yes
470022	Brightspeed	Connect Holding, LLC	Yes
300025	Bug Tussel Wireless LLC	Hilbert Communications LLC	Yes
130192	Cambridge Telcom Services, Inc.   Cambridge Telephone Company	Cambridge TelCom, Inc.	Yes
130208	Cass Cable TV Inc   Cass Cable TV INC   Cass Telephone Company	Cass Communications Management, Inc.	Yes
130235	Charter Communications Inc	Charter Communications	Yes
130287	Clarksville Mutual Telephone Company	Clarksville Mutual Telephone Company	Yes
130183	Clearwave   Sparklight	Cable One, Inc.	Yes
200014	Cogent Communication	Cogent Communications Group	Yes
340015	Comelec Internet Services	Comelec Services, Inc.	Yes
430018	Comelec Internet Services	Canebrake Connections LLC	Yes
290031	Computer Techniques, Inc.	Computer Techniques, Inc.	Yes
130335	Consolidated Communications   Fidium	Consolidated Communications, Inc.	Yes
370068	Conxus	MCC Network Services, LLC	Yes
130368	Crossville Communications	Crossville Consolidated Communications, Inc.	Yes
400092	Crown Castle Fiber LLC	Crown Castle Inc.	Yes
160127	CS Technologies, Inc.	LICT Corporation	Yes
130872	digiMax	MTCO Corporation	Yes

131505	Diverse Communications   Woodhull Telephone	Woodhull Communications, Inc.	Yes
460025	DNA Communications	Digital Network Access Communications Inc.	Yes
290010	Echo Wireless   Nextlink	AMG Technology Investment Group LLC	Yes
130444	Egyptian Internet Services, Inc   EGYPTIAN TELEPHONE COOPERATIVE ASSOCIATION	Egyptian Telephone Cooperative Association	Yes
160115	e-vergent	E-Vergent.com, LLC	Yes
330025	Everstream	Uniti Group Inc.	Yes
130499	First Communications	First Communications, LLC	Yes
130503	Flat Rock Telephone Co op	Flat Rock Telephone Co-Op, Inc.	Yes
130258	FRONTIER	Frontier Communications Corporation	Yes
470034	FullSpeed LLC	Fullspeed LLC	Yes
360117	Fusion   Fusion Cloud Services, Inc.	Fusion Connect, Inc.	Yes
130584	Futiva   Hamilton County Communications   Hamilton County Telephone Coop	Hamilton County Telephone Co-Op	Yes
130535	Geneseo Communications Services, Inc.   Geneseo Telephone Company	Geneseo Communications, Inc.	Yes
130544	Glasford Telephone Company	Glasford Telephone Company	Yes
130557	Grafton Technologies, Inc   Grafton Technologies, Inc.   Grafton Telephone Company	Grafton Communications, Inc.	Yes
130563	Grandview Mutual Telephone	Grandview Mutual Telephone Company	Yes
390138	Gridley Telephone Co.	Egyptian Communication Services, Inc.	Yes
130624	Harrisonville Telephone Company   HTC TECH	HTC Holding Co.	Yes
460038	HeartlandFiber	Heartland Fiber	Yes
130604	Henry County Telephone Company	Henry County Communications, Inc.	Yes
240044	Highland Communication Services	Highland Communication Services	Yes
131074	Home Telenetworks   Home Telephone	Progressive Voice & Data, Inc.	Yes
350085	i3 Broadband	WH i3B Bidco LLC/WH i3B Topco, LLC	Yes
300186	ICS Advanced Technologies	ICS Advanced Technologies	Yes
131445	Illinois Fiber Connect, LLC   Wabash Communications	Wabash Telephone Cooperative, Inc.	Yes
320053	Illinois Net	Illinois Electric Cooperative	Yes

440128	IVNet	Connecting Point Computer Center	Yes
300074	Jo-Carroll Energy, Inc. (NFP)	Jo-Carroll Electric Cooperative Inc.	Yes
190211	Joink	Joink, LLC	Yes
300079	King Street Wireless, L.P.	King Street Wireless, LP	Yes
130699	Kinsman Mutual Telephone Co.	Kinsman Mutual Telephone Co.	Yes
130705	Kraus Electronics Systems	Kraus Electronics Systems Inc.	Yes
200019	KWISP	Express Dial Internet, Inc.	Yes
330086	LaHarpe Telephone Company	LaHarpe Telephone Company, Inc. (IL)	Yes
280069	Leaf_River_Telephone_Company   LR_Communications	ZMP Holding Company	Yes
130735	Leonore Mutual Telephone Company, Inc.	Leonore Mutual Telephone Co., Inc.	Yes
130755	Logix Communications, LP	Logix Communications, LP	Yes
390068	LogonixCorporation	Logonix Corporation	Yes
130769	Madison Communications	Schwartz Ventures, Inc.	Yes
270061	Maxwire Inc   Maxwire Inc.	Maxwire Inc.	Yes
130799	McDonough Telephone Cooperative Inc	McDonough Telephone Cooperative Inc.	Yes
130802	McNabb Internet Connections, Inc.   McNabb Telephone Company	McNabb Communications, Inc.	Yes
130804	Mediacom Bolt   Mediacom_Illinois_LL_C   Mediacom_Indiana_LL_C	Mediacom Communications Corp.	Yes
140064	MetaLINK Technologies, Inc.	Defiance Holdings, LLC	Yes
131081	Metronet Holdings	Metronet Holdings, LLC	Yes
470052	MF Wireless, LLC   MF Wireless, LLC'	MFWireless, LLC	Yes
130819	Mid Century Telephone Cooperative, Inc.	Mid Century Telephone Co-operative	Yes
131180	Moultrie Independent Telephone Company   Shawnee Telephone Company   ShawneeLEC	Shawnee Communications, Inc.	Yes
350068	MR Systems Wireless	MR Systems Wireless, LLC	Yes
300103	NetFortris	NetFortris Acquisition Co., Inc.	Yes
430059	Netrix	Netrix, LLC	Yes
130908	New Windsor Communications, Inc.	New Windsor Communications, Inc.	Yes
130955	Nova1Net	Nova Cablevision, Inc.	Yes
130977	Oneida Network Services   Oneida Telephone Exchange	Oneida Telephone Exchange, Inc.	Yes
300113	Orange Business Services U.S., Inc.	Orange S.A.	Yes
210061	Pavlov Media	Pavlov Media, Inc.	Yes
190290	Peerless Network	Peerless Network Holdings, Inc.	Yes

360122	ProTek Fiber	ProTek Communications, LLC	Yes
130228	Quantum Fiber	Lumen Technologies, Inc.	Yes
131106	Reynolds Cable, Inc.   Reynolds Telephone Company	Reynolds Telephone Company	Yes
140048	Rise Broadband	JAB Wireless, Inc.	Yes
140078	Royell Communications, Inc	Royell Communications, Inc.	Yes
131179	Sharon Telephone Company	Sharon Telephone Company (IL & WI)	Yes
440170	Silo Communications	Silo Communications	Yes
350090	Single Digits, Inc.	Single Digits, Inc.	Yes
230042	S-Net Communications	S-Net Communications, Inc.	Yes
390111	Strada Communications	Strada Communications, LLC	Yes
300150	Stratus Networks, Inc.	Stratus Networks, Inc.	Yes
310066	Surf Internet	Surf Air Wireless, LLC	Yes
131310	TDS Telecom   UNITED STATES CELLULAR CORPORATION	Telephone & Data Systems, incl. UScellular	Yes
190365	Tel-Star Cablevision	Tel-Star Cablevision, Inc.	Yes
130403	T-Mobile US	T-Mobile USA, Inc.	Yes
131358	Toncom, Inc.   Tonica Telephone Company	Tonica Technologies, Inc.	Yes
131386	TPx Communications	U.S. TelePacific Holdings Corp.	Yes
350042	UPN	Fiber Platform, LLC	Yes
130996	US Signal Company	US Signal Company, LLC	Yes
280063	Veloxinet	Veloxnet Inc.	Yes
131425	VERIZON	Verizon Communications Inc.	Yes
131431	Viola Communications, Inc   Viola Home Telephone Co.	Viola Holding Company	Yes
130528	Volo.net Internet + Technology	Gargoyle Technologies, Inc.	Yes
310026	Voyant Communications	Sinch US Holding, Inc.	Yes
130116	W A T C H TV	Benton Ridge Telephone Company	Yes
300034	WIN, LLC		Yes
250085	Wireless Data Net LLC	Wireless Data Net, LLC	Yes
430176	Wisper ISP, LLC	Wisper ISP, Inc.	Yes
230056	Xclutel Communications, LLC	Xclutel, LLC	Yes
130317	Xfinity	Comcast Corporation	Yes
130982	ZAYO GROUP, LLC	Zayo Group, LLC	Yes
430031	Zentro	Everywhere Wireless, LLC	Yes
160157	Zito Media	Zito West Holding, LLC	Yes
460637	AaroBand	AaroBand	No
260003	Bertram Internet	Bertram Communications LLC	No
460010	Blast Communications  Inc.	Blast Communications, Inc.	No
290009	BridgeMAXX Suncoast Broadband	ALTIUS Communications LLC	No
270025	ClearSKY Systems Inc	ClearSKY Systems, Inc.	No



480044	GigFire		No
130627	HughesNet	Hughes Network Systems, LLC	No
390057	IT Works LLC	IT Works LLC	No
190103	JCWIFI.com	Computer Dynamics of NW Illinois, LLC	No
350139	KNR Wireless LLC.	KNR Wireless, LLC.	No
220036	LeapStream	LeapStream	No
130749	LiteWire	LiteWire Internet Services, Inc.	No
130878	Louisa Communications	Mutual Telephone Company of Morning Sun, Iowa	No
240056	LTD Broadband	LTD Broadband LLC	No
470113	Metro Service Center	Metro Service Center	No
380178	Midway Net LLC	MidwayNet, LLC	No
131379	Muscatine Power & Water	City of Muscatine, Iowa	No
480062	Netwitz Internet Services		No
370075	NewarkNet	NewarkNet	No
270065	Noize Communications LLC	Noize Communications LLC	No
430065	PCs For People	PCs for People	No
380132	PeoplesNet	Peoples State Bank	No
350088	Pwr-Net	Shelby Electric Cooperative Inc.	No
370102	SIFIBE	SiFiBE	No
430076	Starlink	Space Exploration Technologies Corp.	No
131261	Stelle Telephone Company	Stelle Telephone Company	No
250081	Urban Communications, Inc	Urban Communications, Inc.	No
290111	Viasat, Inc.	Viasat, Inc.	No
240041	Webpass, Inc.	Google LLC	No

## Appendix 4: CAI Category Codes

Table 6: Category codes for adding a CAI (Type C)

Category code	Definition
D	Definition: The challenger believes that the location fails to meet the definition. For example, while the location may be correctly labeled as a school, the challenger believes that it does not fall within the definition of a school put forth by the Eligible Entity.
N	New CAI, i.e., CAI established or to be operational by June 30, 2024
I	Independent location, i.e., this CAI is affiliated with a listed CAI, but is a separate location and requires its own broadband service

T	The type of the CAI contained in the list provided by the Eligible Entity is wrong. The remainder of the fields should clearly identify the existing listing. The type field should describe the type the challenger believes to be correct
O	Other, as described in the explanation column

**Table 7: Category codes for removing a CAI (Type R)**

Category code	Definition
X	CAI has ceased operation
B	Location does not require fiber broadband service appropriate for CAI. (For example, the location is a remote field station affiliated with a university.)
R	CAI is a private residence or a non-CAI business, i.e., it is mislabeled in the CAI list. For example, a former school building has been converted into an apartment building.
D	Definition: The challenger believes that the location fails to meet the definition. For example, while the location may be correctly labeled as a school, the challenger believes that it does not fall within the definition of a school put forth by the Eligible Entity.
O	Other, as described in the explanation column

# Appendix 5: Challenge Type Codes

Table 9: Challenge Type Codes

Code	Challenge Type	Definition
A	Availability	The broadband service identified is not offered at the location, including a unit of a multiple dwelling unit (MDU).
S	Speed	The actual speed of the service tier falls below the unserved or underserved thresholds.
L	Latency	The round-trip latency of the broadband service exceeds 100ms.
D	Data cap	The only service plans marketed to consumers impose an unreasonable capacity allowance (“data cap”) on the consumer.
T	Technology	The technology indicated for this location is incorrect.
B	Business service only	The location is residential, but the service offered is marketed or available only to businesses.
E	Enforceable commitment	The challenger has knowledge that broadband will be deployed at this location by the date established in the deployment obligation.
N	Not part of an enforceable commitment	This location is in an area that is subject to an enforceable commitment to less than 100% of locations and the location is not covered by that commitment.
P	Planned (or existing) service	The challenger has knowledge that broadband will be deployed at this location by June 30, 2024, without an enforceable commitment or a provider is building out broadband offering performance beyond the requirements of an enforceable commitment. OR Location has existing service available that is not currently reflected in the availability data.
C	Location is a CAI	The location should be classified as a CAI.
R	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.

# Appendix 6: CAI Type Codes

Table 10: CAI Type Codes

Code	CAI Type
C	Community Support Organization
F	Public safety entity
G	Government building
H	Health clinic, health center, hospital, or another medical provider
K	Park
L	Libraries
P	Public Housing Organization
S	School or institute of higher education