



# **BEAD Challenge Process**

**Overview and Submission Instructions**

**April 19, 2024**

# Broadband Equity, Access, and Deployment Program

## What?

**Allocate:** \$1 billion for broadband infrastructure expansion

**Priority:** Fiber for homes and businesses lacking 25/3

**Eligible:** Locations lacking 100/20 Mbps service

## Who?

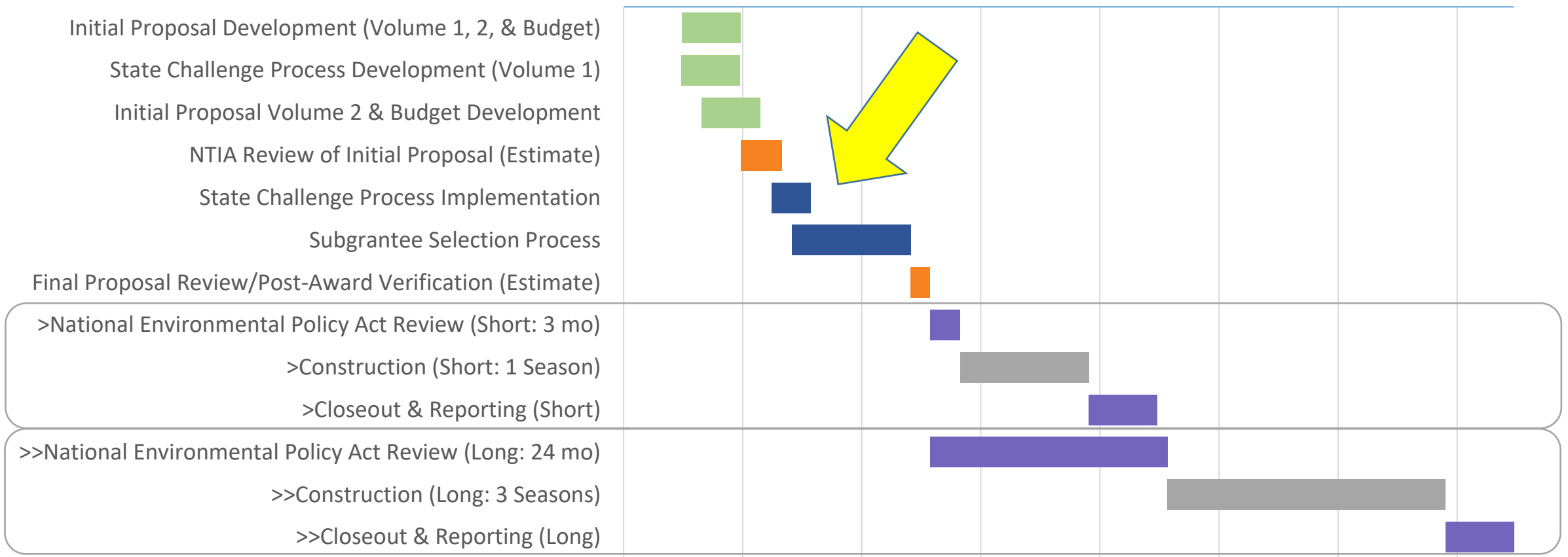
**PSC** operates allocation process: reviewing, scoring, and selecting recipients

**NTIA** oversees to ensure compliance, approves proposals & final allocation

**Potential Awardees** are entities that will construct, own, and operate broadband infrastructure

# Where are we going?

2023 2024 2025 2026 2027 2028 2029 2030

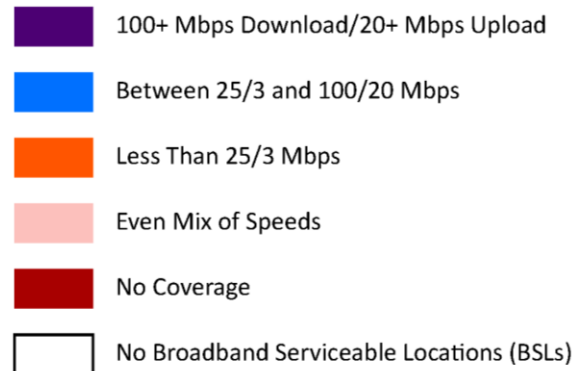
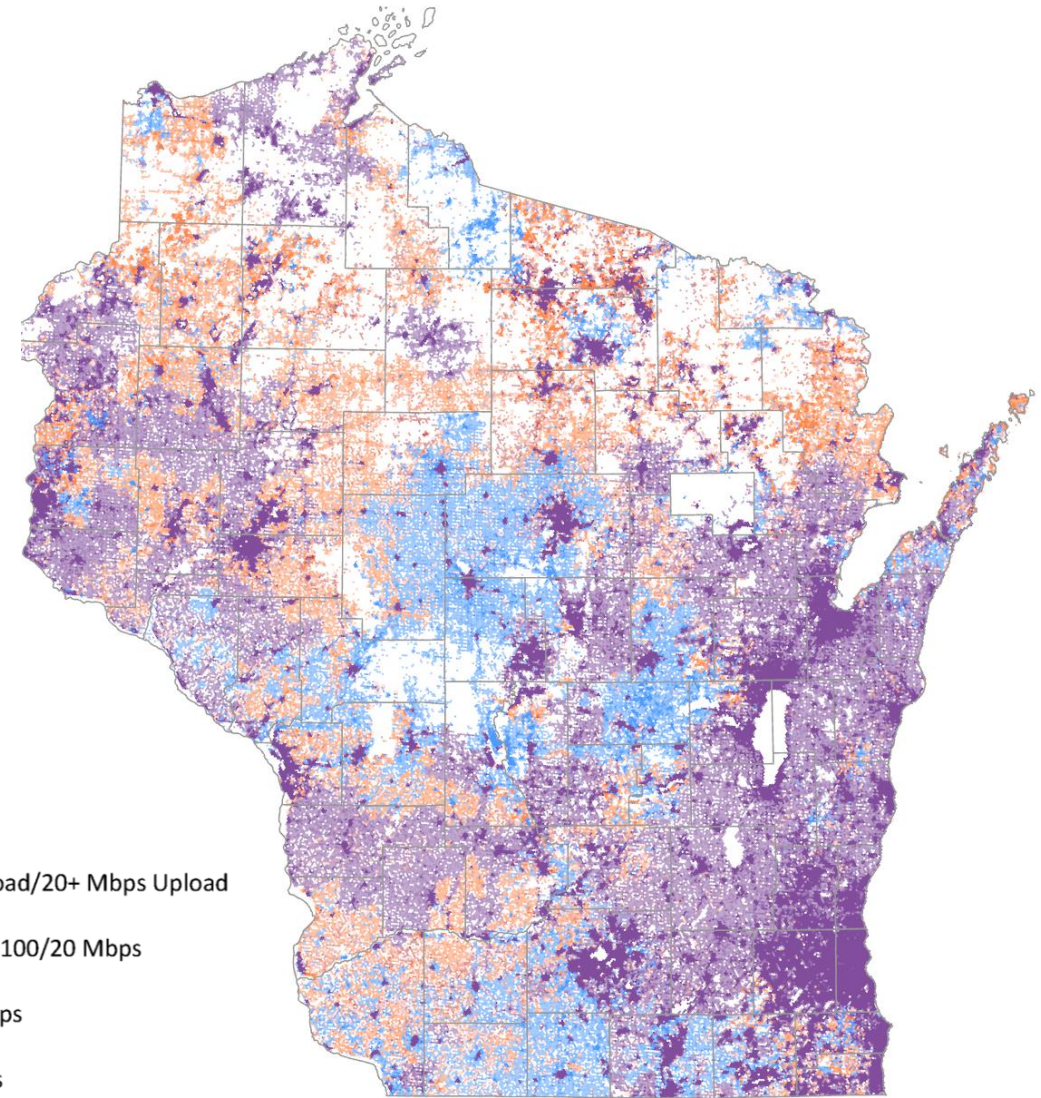


Program Development    NTIA Review    Subgrantee Selection    Construction    Compliance

# Availability Status

as of June 30, 2023

- 2,300,000 locations in Wisconsin
- 200,000 underserved (blue)
  - 25/3 to 100/20 from wired or licensed fixed wireless
- 225,000 unserved (orange)
  - Lack 25/3 or no service, or only unlicensed fixed wireless



# What is the challenge process?

- A process for eligible participants to challenge whether a particular BSL or community anchor institution is eligible for BEAD funds (i.e. underserved or unserved)
- The Challenge Process will determine the final list of eligible locations.

- + 425,000 unserved and underserved locations
- “Enforceable Commitments” (state & federal funding awards)
- + Pre-challenge modifications (DSL & certain locations where advertised ≠ actual)
- Verified planned private builds by June 30, 2024

+/- Locations that are challenged

?? Locations eligible for BEAD

# BEAD Challenge Process Eligible Participants

- 501(c)(3) and 501(c)(6) nonprofit organizations
- Local units of government
- Tribal governments
- Internet service providers with facilities currently in the State of Wisconsin or facilities planned by June 30, 2024.
- Community Anchor Institutions (as defined in Volume 1 and the Challenge Instructions)



# BEAD Challenge Process Timeline

**At least one week prior to start of the challenge process.**

Publish lists of unserved, underserved, and CAI BSL identification numbers that are eligible for BEAD

Publish BEAD Challenge Map

**4/29/2024 – 5/29/2024 at 1:30 PM CT**

30-day Challenge Submission Window

**5/19/2024**

Last day to submit challenges for preliminary completeness review

**5/30/2024 – 6/5/2024** *(Estimate: 5-7 days)*

Commission staff Review Period

*(Estimate: begins after Review Period)*

**6/6/2024 – 7/6/2024 at 1:30 PM CT**

30-day Rebuttal Submission Window

*(Estimate: begins after Rebuttal Window)* **7/7/2024 – 8/6/2024**

Final Determination completed by Commission staff

# Preliminary Review of Challenge Submissions

- **First 20 days of the challenge submission period**, WBO will review challenge submissions for completeness.
- As time permits, starting with the earliest submitted challenges, staff will notify submitters of errors and/or missing information that would result in a challenge being considered incomplete.
- No determinations about permissibility or sufficiency of evidence during preliminary reviews.
- Staff will inform challengers with errors or missing information via email and for the opportunity to resubmit the challenge submission spreadsheet and/or evidence documents.



# What challenges can be submitted?

- BEAD eligibility challenges for existing BSLs
  - availability of service, data cap on service, technology provided, business service only, enforceable commitments (Federal and State funded projects in progress)
- Identification of eligible community anchor institutions
- BEAD eligibility challenges for community anchor institutions
- Planned broadband service (with completion dated June 30, 2024)

**\*BSLs cannot be added or removed during the challenge process\***

# What types of evidence ARE acceptable?

- Screenshot of provider webpage showing service is not available at address.
  - Correspondence from provider indicating they will not provide service
  - Correspondence showing that a provider failed to schedule a service installation or offer an installation date within 10 business days of a request.
  - Detailed contracts/agreements/designs showing planned service for a location.
  - Manufacturer and model number of residential gateway (CPE) that demonstrates the service is delivered via a specific technology.
- ➔ **These are examples and non-exhaustive. WBO Encourages challengers to submit applicable evidence that most appropriately substantiates their challenge.**

# What types of evidence ARE NOT acceptable?

- Speed tests
- Citizen surveys
- Incomplete submissions (missing dates, times, provider, technology)
- Duplicate submissions of a single piece of evidence (i.e. submitting the same piece of evidence saved under a different file name and applied to multiple challenges)
  - You CAN use a single piece of evidence for multiple location challenges, but only submit one evidence file that will then be applied to all applicable challenges.

# Area and Multi-Dwelling Unit (MDU) Challenge Activation

- Reverses the burden of proof to a provider if a certain number of challenges are received *for challenge types: availability, data cap, and/or technology.*
- Area Challenge: activated if six or more locations using a particular technology and a single provider within a census block group are challenged with the same challenge type
- MDU Challenge: to be activated requires challenges for one unit for MDUs having fewer than 15 units, for two units for MDUs of between 16 and 24 units, and at least three units for larger MDUs.
- Modifies all locations to underserved in the area (census block group)/MDU that have the challenged service offering from the same provider

# How to submit a Challenge?

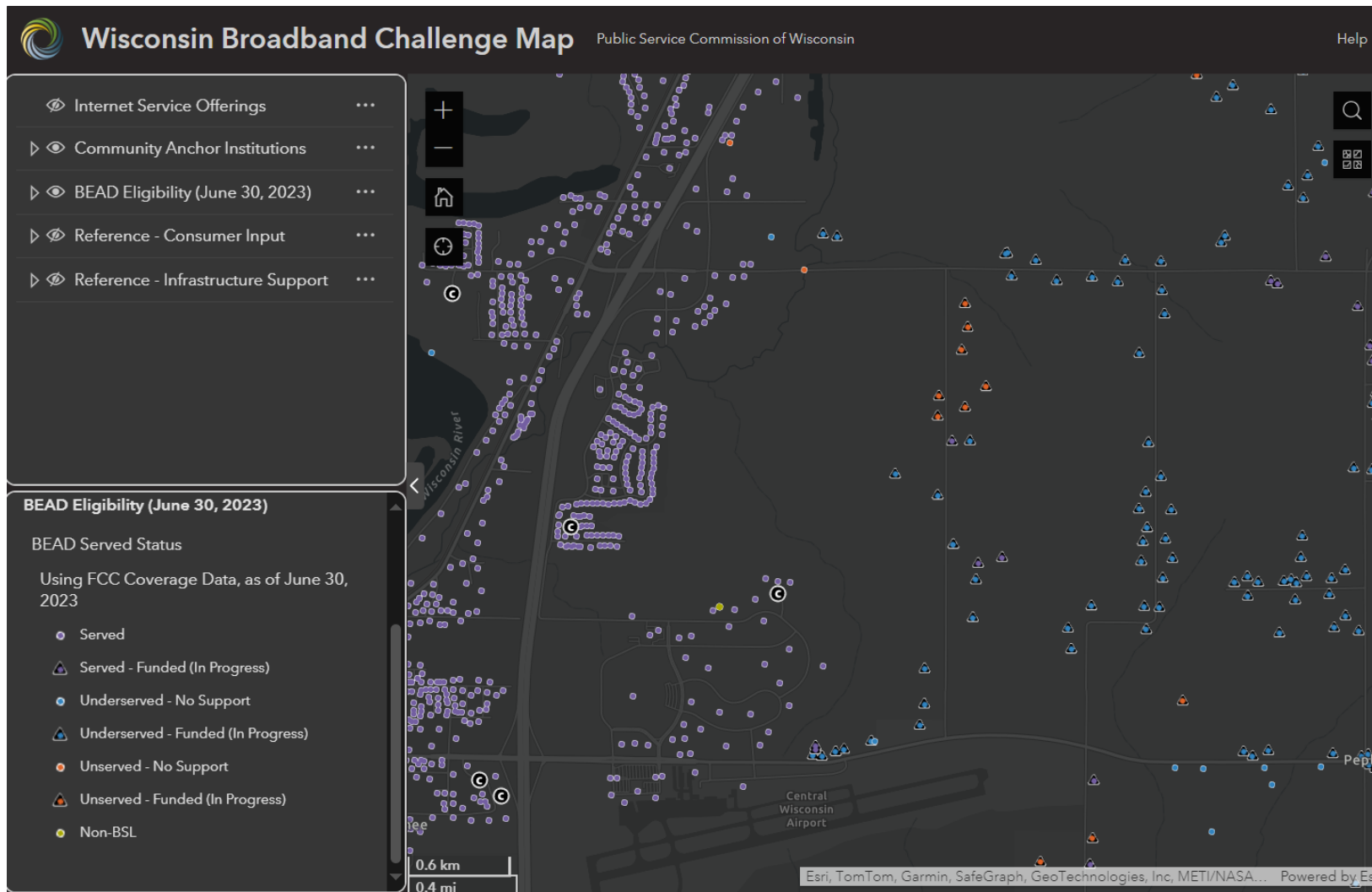
- Upload documents to docket **5-BCH-2024** using the Commission's Electronic Records Filing (ERF) system
  - To submit challenges (and later rebuttals) participants will submit:
    - Eligibility and Confidentiality Form
    - Spreadsheet of locations being challenged
    - Supporting evidence documentation for locations being challenged.
  - CAI only: a simplified online questionnaire is available
- See step-by-step guides on our [BEAD Challenge webpage](#)

# How to Identify locations to Challenge

## Two Options:

- **Option 1: PSC BEAD Challenge Map.** Navigate the map retrieve BSL IDs to compile challenges – ideal for smaller amount of challenges
- **Option 2: Download .csv file of served/unserved/underserved BSL identification numbers to analyze in a geospatial program.** Entities using lists of BSL IDs will need an NTIA license from CostQuest Associates. Without a NTIA license to access the broadband serviceable location fabric, challengers will not be able to meaningfully view or analyze the BSLs in their spatial software to compile challenges – better for a large number of challenges

# Option 1: Use the WI Challenge Map





# Challenge Map Functionality

- Provides all the required data by BSL needed to submit a location and/or CAI challenge
  - BEAD eligibility status (served/underserved/served)
  - Service offerings (provider, technology, speed)
  - BSL identification number
  - Whether location is a multi-dwelling unit (MDU)
  - CAIs and identifies type of CAI
  - Eligible challengers can copy the required data from the map into the challenge and/or CAI challenge submission spreadsheets and upload.
- BEAD Challenge Map webinar: **Tuesday April 23<sup>rd</sup> at 1pm.**

## Option 2: Download BSL Data to Analyze

- Navigate to the [BEAD Challenge webpage](#)
- Directly download .csv files of all BSLs, delineating:
  - BEAD speed category (unserved, underserved, served)
  - Enforceable funding commitment (yes, no)
  - Pre-challenge modification (yes, no)
- These .csv files can be used in conjunction with the Broadband Serviceable Location Fabric (Fabric) to analyze locations in spatial software
- The fabric is only accessible with a free NTIA CostQuest License.

# Request a NTIA CostQuest License

- Tier D License: For Internet Service Providers registered with the FCC who may apply for BEAD funding and/or may participate in the BEAD challenge process.
- Tier E License: For eligible non-profit organizations (501(c)(3) and 501(c)(6)), local government, and Tribal government entities with the necessary GIS expertise interested in participating in the BEAD challenge process, particularly if they anticipate challenging multiple BSLs.
  - Eligible challengers requesting a Tier E license that do not have a FCC Registration Number (FRN) must get an FRN number before requesting a Tier E license.

# Community Anchor Institution (CAI) Challenges

## Option 1: CAI Challenge Online Questionnaire

- Ability to submit a single CAI location challenge at a time
- ERF uploads not required
- Best option for challengers submitting one or a few challenges

## Option 2: Bulk CAI Challenge uploaded to docket 5-BCH-2024

- Fill the CAI challenge spreadsheet and Attestation and Confidentiality Form and upload to the docket
- Best for challengers submitting more than 10 CAI challenges.

# CAI Challenge Questionnaire

- A link to the CAI Challenge Questionnaire will be available on the [BEAD Challenge Process webpage](#) by April 29
- The CAI Challenge Questionnaire includes required eligibility and attestation questions.
- If the eligible challenger is only submitting a CAI Challenge using the questionnaire, they are not required to upload any documents to docket 5-BCH-2024.

# Submitting a Challenge: Step-by-Step Instructions

- Ensure you have created an ERF account on the PSC website
- If you have not created an ERF account, below the log in fields, click the link "create new individual account" and complete the required fields



# Documents Required to Submit a Challenge

- 1. Completed Eligibility and Confidentiality Form:** eligible participants must provide all the required information and submit before or at the time of challenges being submitted. This form only needs to be submitted once for each entity participating in the challenge process.
- 2. Completed Challenge Submission Spreadsheet:** a spreadsheet template will be used to indicate every location being challenged
- 3. Evidence Documentation:** all locations being challenged must have at least one piece of evidence documentation submitted that supports the respective challenge to a location.



# Complete the Eligibility and Confidentiality Form

## BEAD Challenge Participant Eligibility & Confidentiality Form



Complete this BEAD Challenge Eligibility and Confidentiality Form and save the completed form as a PDF. Completed forms should be submitted before or at the same time that a challenge or rebuttal is submitted to the 5-BCH-2024 docket on the Public Service Commission's [electronic record filing system \(ERF\)](#), with the Challenge Submission Spreadsheet. For updates, subscribe to the docket [here](#). If you need assistance completing this form or require an alternative format, please email [PSCBEADChallenge@wisconsin.gov](mailto:PSCBEADChallenge@wisconsin.gov).

### Eligible Challenge or Rebuttal Participant Information

1. Entity Name	2. Entity d/b/a (if applicable)
3. Primary Contact Name	4. Primary Contact Email
5. Physical Address	6. Primary Contact Phone Number
7. Entity Website	

8. Eligible Entity Type (select one)

Internet Service Provider  
(required) Enter FCC Registration Number (FRN):

Local Unit of Government

Tribal Government

501 (c)(3) or 501 (c)(6) Non-Profit Organization

Community Anchor Institution

### Attestation

Enter the contact information of the person authorizing and submitting this BEAD Challenge Participant Information and Attestation Form. By including your name below, you certify that the above information and any challenges and rebuttals submitted as a part of the Wisconsin BEAD Challenge Process are complete, accurate, and true to the best of the participating entities knowledge and that you have the authority, granted by the participating entity, to submit this form on its behalf.

1. Name	2. Title
3. Phone Number	4. Email Address
	5. Date

### Acceptance of Confidentiality Practices

Participation in the BEAD Challenge Process may include submission of evidence documents containing material that requires confidential handling consistent with Wisconsin Administrative Code [§ PSC 2.12](#). To adjudicate challenges, it is necessary for the Commission to release unredacted versions of confidential material submitted by a challenger to the challenged entity (or vice versa) so that it may review the evidence and provide a response to the challenge. For example, a customer's claim a provider does not offer service at a location would be shared with that internet service provider to provide a response to the assertion.

By signing below, submitter releases its claim of confidentiality for submitted evidence in the narrow instance where an evidence document is being provided to the entity that is the subject of the challenge or rebuttal. The signatory thus allows the Commission to share their confidentially submitted information with the entity that is the subject of its challenge or rebuttal.

1. Name	2. Title
3. Phone Number	4. Email Address
	5. Date

- Eligible challenge participants will only complete and submit the Eligibility and Confidentiality Form once for all challenges and rebuttals.
- Must be submitted before or at the same time that a challenge is submitted to the 5-BCH-2024 docket on ERF with the Challenge Submission Spreadsheet.
- Save file as:  
**[entityname]\_challengeform.pdf**

# Download, Review and Prepare to fill Challenge Submission Spreadsheet

	A	B	C	D	E	F
1	<b>Challenge Type Code</b> Enter the Challenge Code or Select the Challenge Code from the dropdown menu  A - Availability D - Data Cap T - Technology B - Business Service Only P - Planned Service E - Enforceable Commitment N - Not part of Enforceable Commitment	<b>Challenger Entity Name</b> Enter your entities legal name. Do not use the entity's d.b.a.	<b>Challenger entity type</b> Select your entity type from the drop down menu in the cells below.  - Internet Service Provider (provider)  - 501 (c )(3) or 501 (c )(6) nonprofit (non-profit)  - Local or Tribal Government  -Community Anchor Institution (CAI)	<b>Service Provider</b> Provide the name of the service provider being challenged if applicable. i.e If a challenger is claiming they have planned service (P) or an enforceable commitment (E) a service provider is not being directly challenged.	<b>Technology Code</b> Enter or select from the dropdown menu the technology code of the location being challenged.  10 - Copper Wire (DSL) 40 - Coaxial Cable 50 - Fiber to the Premises/Optical Carrier 60 - Geostationary Satellite 61 - Non-Geostationary Satellite 70 - Unlicensed Terrestrial Fixed Wireless 71 - Licensed Terrestrial Fixed Wireless 72 - Licensed-by-Rule Terrestrial Fixed Wireless	<b>Broadband Serviceable Location (BSL)</b> Enter the 10-digit BSL ID being challenged.

# Download, Review and Prepare to fill Challenge Submission Spreadsheet

G	H	I	J
<p><b>Unit (apartment)</b> If the location being challenged is a unit/apartment within a multi-dwelling unit building, provide the unit/apartment number. Leave blank if not applicable.</p>	<p><b>Availability Challenge (A) Reason Code</b> <u>Only for Availability (A) Challenge Type</u>: select from the dropdown menu or enter the availability reason code that applies (1-9). <u>For other challenge codes, leave field blank.</u></p> <p>1 - Provider failed to schedule a service installation within 10 business days of a request.            2 - Provider did not install the service at the agreed-upon time.            3 - Provider requested more than the standard installation fee to connect the location.            4 - Provider denied the request for service.            5 - Provider does not offer the technology entered above at this location.            6 - Provider does not offer the speed(s) shown on the Broadband Map for purchase at this location.            8 - No wireless or satellite signal is available at this location.            9 - New, non-standard equipment is required to connect this location  <i>*reason code 7 intentionally not included, unapplicable FCC code for purposes of availability challenges</i></p>	<p><b>Challenge Evidence Type(s)</b> Indicate the types of evidence being provided, separated by a comma (e.g. screenshot, email). See BEAD Challenge Instructions for specific examples of evidence for each challenge type.</p>	<p><b>Challenge Evidence File(s)</b> For each piece of evidence being uploaded to docket 5-BCH-2024 to support a specific challenge, list the file names. Files should be saved using the following convention: <i>challenger name_CHevidence#.pdf</i> (e.g. bestprovider_evidence1.pdf) List all evidence documents for a BSL separated by a comma (e.g. bestprovider_CHevidence1.pdf,bestprovider_CHevidence2.pdf). Do not create duplicates of an evidence document. Upload one evidence document and indicate that evidence file name for each challenge it applies to.</p> <p>Evidence files will be uploaded to ERF.</p> <p><b>**NOTE only .pdf files are accepted. If you are providing a screenshot (.png or .jpg), paste into a text document and save as .pdf file before uploading.***</b></p>

# Identify locations to Challenge

## Two Options:

- **Option 1: PSC BEAD Challenge Map.** Navigate the map retrieve BSL IDs to compile challenges – ideal for smaller amount of challenges
- **Option 2: Download .csv file of served/unserved/underserved BSL identification numbers to analyze in a geospatial program.** Entities using lists of BSL IDs will need an NTIA license from CostQuest Associates. Without a NTIA license to access the broadband serviceable location fabric, challengers will not be able to meaningfully view or analyze the BSLs in their spatial software to compile challenges – better for a large number of challenges

# Prepare Evidence Documents While Identifying Challenges

- Create a .pdf for each piece of evidence
  - Only .pdf files are accepted. If you are providing a screenshot or photo (.png or .jpg), paste it into a text document and save as .pdf file.
- Evidence file name must align to the correct naming conventions provided in the instructions and submission spreadsheet: **[*entity name*]<sub>C</sub>evidence[#].pdf**
- The file names will be noted in the BEAD Challenge Submission Spreadsheet for each location challenge that they apply to (evidence docs can apply to more than one location being challenged).

# Fill in spreadsheet throughout this process

## Example of Completed Challenge Submission Spreadsheet

	A	B	C	D	E	F
1	<b>Challenge Type Code</b>	<b>Challenger Entity Name</b>	<b>Challenger entity type</b>	<b>Service Provider</b>	<b>Technology Code</b>	<b>Broadband Serviceable Location (BSL)</b>
	Enter the Challenge Code or Select the Challenge Code from the dropdown menu  A - Availability D - Data Cap T - Technology B - Business Service Only P - Planned Service E - Enforceable Commitment N - Not part of Enforceable Commitment	Enter your entities legal name. Do not use the entity's d.b.a.	Select your entity type from the drop down menu in the cells below.  - Internet Service Provider (provider)  - 501 (c )(3) or 501 (c )(6) nonprofit (non-profit)  - Local or Tribal Government  -Community Anchor Institution (CAI)	Provide the name of the service provider being challenged if applicable. i.e If a challenger is claiming they have planned service (P) or an enforceable commitment (E) a service provider is not being directly challenged.	Enter or select from the dropdown menu the technology code of the location being challenged.  10 - Copper Wire (DSL) 40 - Coaxial Cable 50 - Fiber to the Premises/Optical Carrier 60 - Geostationary Satellite 61 - Non-Geostationary Satellite 70 - Unlicensed Terrestrial Fixed Wireless 71 - Licensed Terrestrial Fixed Wireless 72 - Licensed-by-Rule Terrestrial Fixed Wireless	Enter the 10-digit BSL ID being challenged.
2						
3	A	ISPsRuleLLC	provider	BigGig Internet	50	1347164979
4	A	ISPsRuleLLC	provider	BigGig Internet	50	1347163943
5	A	ISPsRuleLLC	provider	BigGig Internet	50	1347163292
6	T	ISPsRuleLLC	provider	BestWireless	71	1347162981
7	P	ISPsRuleLLC	provider		50	1347160229
8	P	ISPsRuleLLC	provider		50	1347159719



# Example of Completed Challenge Submission Spreadsheet

G	H	I	J
<b>Unit (apartment)</b> If the location being challenged is a unit/apartment within a multi-dwelling unit building, provide the unit/apartment number. Leave blank if not applicable.	<b>Availability Challenge (A) Reason Code</b> <u>Only for Availability (A) Challenge Type</u> : select from the dropdown menu or enter the availability reason code that applies (1-9). <u>For other challenge codes, leave field blank.</u>  1 - Provider failed to schedule a service installation within 10 business days of a request. 2 - Provider did not install the service at the agreed-upon time. 3 - Provider requested more than the standard installation fee to connect the location. 4 - Provider denied the request for service. 5 - Provider does not offer the technology entered above at this location. 6 - Provider does not offer the speed(s) shown on the Broadband Map for purchase at this location. 8 - No wireless or satellite signal is available at this location. 9 - New, non-standard equipment is required to connect this location <i>*reason code 7 intentionally not included, unapplicable FCC code for purposes of availability challenges</i>	<b>Challenge Evidence Type(s)</b> Indicate the types of evidence being provided, separated by a comma (e.g. screenshot, email). See BEAD Challenge Instructions for specific examples of evidence for each challenge type.	<b>Challenge Evidence File(s)</b> For each piece of evidence being uploaded to docket 5-BCH-2024 to support a specific challenge, list the file names. Files should be saved using the following convention: <i>challenger name_ CEvidence#.pdf</i> (e.g. bestprovider_evidence1.pdf) List all evidence documents for a BSL separated by a comma (e.g. bestprovider_CHevidence1.pdf,bestprovider_CHevidence2.pdf). Do not create duplicates of an evidence document. Upload one evidence document and indicate that evidence file name for each challenge it applies to.  Evidence files will be uploaded to ERF.  <b>**NOTE only .pdf files are accepted. If you are providing a screenshot (.png or .jpg), paste into a text document and save as .pdf file before uploading.**</b>
		5 email, screenshot	ISPsRuleLLC_CHevidence1.pdf, ISPsRuleLLC_CHevidence2.pdf
		5 email, screenshot	ISPsRuleLLC_CHevidence1.pdf, ISPsRuleLLC_CHevidence2.pdf
		5 email, screenshot	ISPsRuleLLC_CHevidence1.pdf, ISPsRuleLLC_CHevidence2.pdf
		screenshot	ISPsRuleLLC_CHevidence3.pdf
		construction contract, permits	ISPsRuleLLC_CHevidence4.pdf, ISPsRuleLLC_CHevidence5.pdf
		construction contract, permits	ISPsRuleLLC_CHevidence4.pdf, ISPsRuleLLC_CHevidence5.pdf





# File Naming Conventions - Challenges

Document	Completed saved file naming convention	Document type selection for upload	Description for upload
BEAD Challenge Participant Eligibility and Confidentiality Form	<b>[entity name]_challengeform.pdf</b>	Correspondence	Entity Name Challenge Form
BEAD Challenge Submission Spreadsheet	<b>[entity name] challenge.xlsx</b>	Data Request/Response	Entity Name Challenge Data
BEAD Challenge Evidence Documents	<b>[entity name]_CEvidence[#].pdf</b>	Comments	Entity Name CH Evidence[#]

# Submit by Uploading to Docket 5-BCH-2024

WISCONSIN.GOV
Agency Directory Online Services


ERF  
 Electronic Records Filing System
 

**ERF Upload**

**UPLOAD DOCUMENTS**

Public

Confidential & Public Redacted

GIS Files (Public)

**CHECK UPLOADED STATUS**

Pending

Accepted

Rejected

**USER MAINTENANCE**

Change Password

Update Profile

**SUBSCRIPTION**

Subscription Profile

### Upload Public Document

**Step 1: Specify the Docket or Utility**

- If you select option 1, you must enter the docket and click the **Check Docket** button.
- If you select option 2, you must enter the utility id and click the **Check Utility ID** button.
- Once the docket or utility id is verified you will be allowed to select files to upload.

**Choose an Option**

Existing Docket

Existing Service Provider/  
New Docket Application

New Service Provider

Docket

5    BCH    2024

BEAD Challenge Process

\*\*\* It's ok to upload document to this docket \*\*\*

**Step 2: Select the Documents to Upload**

- No file chosen [Remove File](#)  
 Document Type: Correspondence   
 Description: Entity Name Challenge Form
- No file chosen [Remove File](#)  
 Document Type: Data Request / Response   
 Description: Entity Name Challenge Data
- No file chosen [Remove File](#)  
 Document Type: Comments   
 Description: Entity Name CH Evidence 1
- No file chosen [Remove File](#)

# Submitting a CAI Challenge: Step-by-Step Instructions

## Option 1: Single CAI Challenge Submission using the online questionnaire

- Navigate to CAI Challenge Form: the form is accessible from the [BEAD Challenge Process webpage](#)
- If the eligible challenger is only submitting a CAI Challenge using the online questionnaire, they are not required to upload any documents to docket 5-BCH-2024.

# How to Identify CAI locations to Challenge

## Two Options:

- **Option 1: PSC BEAD Challenge Map.** Navigate the map to review known CAIs to compile a challenge using the online questionnaire
- **Option 2: Download .csv file of identified CAIs.** Review the spreadsheet and/or analyze CAI locations in spatial software.

# Option 1: Fill CAI Challenge Online Questionnaire

Part 1-3: Requires same information as the Eligibility and Confidentiality Form

Part 4: Challenge Information

- CAI Name and type of CAI being challenged
- Address
- Location ID
- Challenge Type Code
- Challenge Rational Code and Explanation
- Further explanation substantiating challenge

### Challenge Type Code

- C - Location is a CAI
- R - Location is Not a CAI
- G - CAI qualifying Broadband unavailable
- Q - CAI qualifying broadband available

### Challenge Rational Code

- X - CAI ceased operation
- B - Does not require 1 GB service appropriate for CAI
- R - Private residence or a non-CAI business
- D - CAI does match the definition if the CAI Type
- N - Newly established or will be operational by June 30, 2024
- I - Independent location - affiliated with a listed CAI but is a separate location
- T - CAI type for the location is wrong
- O - Other (provide explanation)

## Option 2: Upload CAI Submission Spreadsheet to Docket 5-BCH-2024

- **Completed Eligibility and Confidentiality Form:** eligible participants must provide all the required information and submit before or at the time of challenges being submitted.
- **Completed CAI Challenge Submission Spreadsheet:** a spreadsheet template will be used to indicate CAI locations being challenged
- All documents and optional evidence will be uploaded to docket 5-BCH-2024

# Submitting a CAI Challenge Spreadsheet : Step-by-Step Instructions

- Ensure you have created an ERF account on the PSC website
- If you have not created an ERF account, below the log in fields, click the link "create new individual account" and complete the required fields





# Complete the Eligibility and Confidentiality Form

## BEAD Challenge Participant Eligibility & Confidentiality Form



Complete this BEAD Challenge Eligibility and Confidentiality Form and save the completed form as a PDF. Completed forms should be submitted before or at the same time that a challenge or rebuttal is submitted to the 5-BCH-2024 docket on the Public Service Commission's [electronic record filing system \(ERF\)](#), with the Challenge Submission Spreadsheet. For updates, subscribe to the docket [here](#). If you need assistance completing this form or require an alternative format, please email [PSCBEADChallenge@wisconsin.gov](mailto:PSCBEADChallenge@wisconsin.gov).

### Eligible Challenge or Rebuttal Participant Information

1. Entity Name	2. Entity d/b/a (if applicable)
3. Primary Contact Name	4. Primary Contact Email
5. Physical Address	6. Primary Contact Phone Number
7. Entity Website	

8. Eligible Entity Type (select one)

Internet Service Provider  
(required) Enter FCC Registration Number (FRN):

Local Unit of Government

Tribal Government

501 (c)(3) or 501 (c)(6) Non-Profit Organization

Community Anchor Institution

### Attestation

Enter the contact information of the person authorizing and submitting this BEAD Challenge Participant Information and Attestation Form. By including your name below, you certify that the above information and any challenges and rebuttals submitted as a part of the Wisconsin BEAD Challenge Process are complete, accurate, and true to the best of the participating entities knowledge and that you have the authority, granted by the participating entity, to submit this form on its behalf.

1. Name	2. Title
3. Phone Number	4. Email Address
	5. Date

### Acceptance of Confidentiality Practices

Participation in the BEAD Challenge Process may include submission of evidence documents containing material that requires confidential handling consistent with Wisconsin Administrative Code [§ PSC 2.12](#). To adjudicate challenges, it is necessary for the Commission to release unredacted versions of confidential material submitted by a challenger to the challenged entity (or vice versa) so that it may review the evidence and provide a response to the challenge. For example, a customer's claim a provider does not offer service at a location would be shared with that internet service provider to provide a response to the assertion.

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1. Name	2. Title
3. Phone Number	4. Email Address
	5. Date

- Eligible challenge participants will only complete and submit the Eligibility and Confidentiality Form once for all challenges and rebuttals.
- Must be submitted before or at the same time that a challenge is submitted to the 5-BCH-2024 docket on ERF with the Challenge Submission Spreadsheet.
- Save file as: **[entityname]\_challengeform.pdf**

# Download, Review and Prepare to fill CAI Challenge Submission Spreadsheet

	A	B	C	D	E	F
1	<b>Challenge Type Code</b>	<b>Challenger Entity Name</b>	<b>Challenger entity type</b>	<b>Challenge Rational Code</b>	<b>Rational Explanation</b>	<b>Narrative Explanation Substantiating Challenge Claim</b>
	C - Location is a CAI R - Location is Not a CAI G - CAI qualifying Broadband unavailable Q - CAI qualifying broadband available	Enter your entities legal name. Do not use the entity's d.b.a..	Select your entity type from the drop down menu in the cells below.  - Internet Service Provider (provider)  - 501 (c )(3) or 501 (c )(6) nonprofit (non-profit)  - Local or Tribal Government  - Community Anchor Institution (CAI)	X - CAI ceased operation B - Does not require 1 GB service appropriate for CAI R - Private residence or a non-CAI business D - CAI does match the definition if the CAI Type N - Newly established or will be operational by June 30, 2024 I - Independent location - affiliated with a listed CAI but is a separate location T - CAI type for the location is wrong O- Other (provide explanation)	Provide a brief explanation for the rational code selected.	Provide narrative evidence for the challenge, such as the CAIs website, information on services offered, mission statement, information on board of directors, etc

F	G	H	I	J	K	L	M	N	O	P	Q
<b>Narrative Explanation Substantiating Challenge Claim</b>	<b>CAI Type</b>	<b>CAI Name</b>	<b>Location ID</b>	<b>Address</b>	<b>City</b>	<b>State</b>	<b>Zip Code</b>	<b>Latitude</b>	<b>Longitude</b>	<b>[optional] Evidence Type</b>	<b>[optional] Evidence File Name(s)</b>
Provide narrative evidence for the challenge, such as the CAIs website, information on services offered, mission statement, information on board of directors, etc	S - School L - Library H - Health F - Public Safety P - Public Housing C - Community Support Organization <i>*see challenge instructions for definitions</i>	Indicate the name of the CAI being challenged	BSL ID or Location ID if available in CAI list/Challenge Map - leave empty if entity has no location ID					(if available on BEAD Challenge Map)	(if available on BEAD Challenge Map)	Indicate the types of evidence being provided, separated by a comma (e.g. screenshot, email). See BEAD Challenge Instructions for specific examples of evidence for each challenge type.	Enter the name of the evidence documentation that supports the CAI challenge. The evidence file name must align to the following naming convention: [entity name]_CAIevidence[#].pdf

# How to Identify CAI locations to Challenge

## Two Options:

- **Option 1: PSC BEAD Challenge Map.** Navigate the map to review known CAIs to compile challenges
- **Option 2: Download .csv file of identified CAIs.** Review the spreadsheet and/or analyze CAI locations in spatial software.

# Fill in Spreadsheet as CAIs are identified to Challenge

## Example of Completed CAI Challenge Submission Spreadsheet

	A	B	C	D	E	F
1	<b>CAI Challenge Type Code</b> C - Location is a CAI R - Location is Not a CAI G - CAI qualifying Broadband unavailable Q - CAI qualifying broadband available	<b>Challenger Entity Name</b> Enter your entities legal name. Do not use the entity's d.b.a..	<b>Challenger entity type</b> Select your entity type from the drop down menu in the cells below.  - Internet Service Provider (provider)  - 501 (c )(3) or 501 (c )(6) nonprofit (non-profit)  - Local or Tribal Government  - Community Anchor Institution (CAI)	<b>CAI Challenge Rational Code</b> X - CAI ceased operation B - Does not require 1 GB service appropriate for CAI R - Private residence or a non-CAI business D - CAI does match the definition if the CAI Type N - Newly established or will be operational by June 30, 2024 I - Independent location - affiliated with a listed CAI but is a separate location T - CAI type for the location is wrong O- Other (provide explanation)	<b>Rational Explanation</b> Provide a brief explanation for the rational code selected.	<b>Narrative Explanation Substantiating CAI Challenge Claim</b> Provide narrative evidence for the challenge, such as the CAIs website, information on services offered, mission statement, information on board of directors, etc
2						
3	C	It'sALibrary	CAI	D	location is a library	itsalibrary.org
4	R	It'sALibrary	CAI	R	location is not a hospital; does not require 1 GB service	Location does not state it is a hospital and description does not match BEAD definition
5	G	It'sALibrary	CAI	N	new school being built; requires service	see school district website: itsaschool.org
6	Q	It'sALibrary	CAI	O	location has 1 Gig service currently	

# Fill in Spreadsheet as CAIs are identified to Challenge


## Example of Completed CAI Challenge Submission Spreadsheet

G	H	I	J	K	L	M	N	O	P	Q
CAI Type	CAI Name	Location ID	Address	City	State	Zip Code	Latitude (if available on BEAD Challenge Map)	Longitude (if available on BEAD Challenge Map)	[optional] Evidence Type	[optional] Evidence File Name(s)
S - School L - Library H - Health F - Public Safety P - Public Housing C - Community Support Organization <i>*see challenge instructions for definitions</i>	Indicate the name of the CAI being challenged	BSL ID or Location ID if available in CAI list/Challenge Map - leave empty if entity has no location ID							Indicate the types of evidence being provided, separated by a comma (e.g. screenshot, email). See BEAD Challenge Instructions for specific examples of evidence for each challenge type.	Enter the name of the evidence documentation that supports the CAI challenge. The evidence file name must align to the following naming convention: [entity name]_CAIevidence[#].pdf
L	It'sALibrary		1234 BSL Lane	Laketown	WI	12345				
H	NotaHospital	9000000011	321 NotAHospitalWa	Healthtown	WI	12345			screenshot	It'sASchool_CAIevidence1.pdf, It'sASchool_CAIevidence2.pdf
S	It'sASchool		123 School Drive	Schooltown	WI	12345			screenshot	It'sASchool_CAIevidence4.pdf
F	SafetyBuilding		123 SafetyBuilding La	Safetytown	WI	12345			screenshot	It'sASchool_CAIevidence3.pdf

# File Naming Conventions – CAI Challenges

Document	Completed saved file naming convention	Document type selection for upload	Description for upload
BEAD Challenge Participant Eligibility and Confidentiality Form	<b>[entity name]_challengeform.pdf</b>	Correspondence	Entity Name Challenge Form
BEAD CAI Challenge Submission Spreadsheet	<b>[entity name] CAIchallenge.xlsx</b>	Data Request/Response	Entity Name CAI Challenge
BEAD CAI Challenge Evidence Documents	<b>[entity name]_CAIevidence[#].pdf</b>	Comments	Entity Name CAI Evidence[#]


# Submit by Uploading to Docket 5-BCH-2024



Public Service Commission  
of WISCONSIN

ERF  
Electronic Records Filing  
System



 **ERF Upload**

**UPLOAD DOCUMENTS**

Public

Confidential & Public Redacted

GIS Files (Public)

**CHECK UPLOADED STATUS**

Pending

Accepted

Rejected

**USER MAINTENANCE**

Change Password

Update Profile

**SUBSCRIPTION**

Subscription Profile

### Upload Public Document

**Step 1: Specify the Docket or Utility**

- If you select option 1, you must enter the docket and click the **Check Docket** button.
- If you select option 2, you must enter the utility id and click the **Check Utility ID** button.
- Once the docket or utility id is verified you will be allowed to select files to upload.

**Choose an Option**

Existing Docket

Existing Service Provider/  
New Docket Application

New Service Provider

Docket

5 | BCH | 2024

BEAD Challenge Process

\*\*\* It's ok to upload document to this docket \*\*\*

**Step 2: Select the Documents to Upload**

- No file chosen [Remove File](#)  
 Document Type: Correspondence  
 Description: [Entity Name] Challenge Form
- No file chosen [Remove File](#)  
 Document Type: Data Request / Response  
 Description: [Entity Name] CAI Challenge
- No file chosen [Remove File](#)  
 Document Type: Comments  
 Description: [Entity Name] CAI Evidence [#]



# Submitting a Rebuttal: Step-by-Step Instructions

- All challenges that are complete, meet the minimum level of evidence, and that would modify a location's eligibility status will be available to view in the BEAD challenge tracker for review
  - The BEAD Challenge Map will also be updated to show types of challenges received for each BSL
- Providers who have received challenges to their service at locations are the only entities allowed to submit a rebuttal and will be directly emailed a spreadsheet of all accepted challenges for rebuttals
- Accepted challenges that are not directed at a specific provider will be compiled in a single spreadsheet and uploaded to ERF

## Providers only

Challenges to broadband service will only be available for rebuttal to the provider being directly challenged. Challenges that only accept rebuttals from providers include the following challenge types:

- A - availability
- D - data cap
- T - technology
- G - CAI: Qualifying Broadband Not Available
- Q- CAI: Qualifying Broadband Available
- M – Measurement (pre-challenge modification rebuttal)

## All participants

Successful challenges that are not directed at a specific provider will be available for rebuttal by all eligible participants and compiled in a single spreadsheet in the same format as the challenge submission template, and uploaded to docket 5-BCH-2024 for the following challenge types:

- B - business service only
- P - planned service
- E - enforceable commitment
- N - not part of enforceable commitment
- C - location is a CAI
- R - location is not a CAI

# Submitting a Rebuttal: Step-by-Step Instructions

- **All Eligible Challengers**


- Will download a spreadsheet of all compiled challenges that will include additional columns for adding information and evidence for rebuttals.

- **Providers**


- Will use provided spreadsheet of their specific challenges to service that includes additional columns for adding information and evidence for rebuttals.

# All Rebuttals will be Submitted by Uploading to Docket 5-BCH-2024

Wisconsin.Gov
Agency Directory Online Services



ERF  
Electronic Records Filing  
System



**ERF Upload**

**UPLOAD DOCUMENTS**

**Public**

Confidential & Public Redacted

GIS Files (Public)

**CHECK UPLOADED STATUS**

Pending

Accepted

Rejected

**USER MAINTENANCE**

Change Password

Update Profile

**SUBSCRIPTION**

Subscription Profile

### Upload Public Document

**Step 1: Specify the Docket or Utility**

- If you select option 1, you must enter the docket and click the **Check Docket** button.
- If you select option 2, you must enter the utility id and click the **Check Utility ID** button.
- Once the docket or utility id is verified you will be allowed to select files to upload.

**Choose an Option**

Existing Docket

Existing Service Provider/  
New Docket Application

New Service Provider

Docket

5 BCH 2024

BEAD Challenge Process

\*\*\* It's ok to upload document to this docket \*\*\*

**Step 2: Select the Documents to Upload**

- No file chosen [Remove File](#)  
 Document Type: Data Request / Response  
 Description: [Provider/Entity Name] Rebuttal
- No file chosen [Remove File](#)  
 Document Type: Comments  
 Description: [Entity/Provider Name] RB Evidence [#]
- No file chosen [Remove File](#)  
 Document Type: -- Select Document Type --  
 Description:

# What should you do next?

## Next Steps for Local/Tribal Governments:

- Review service availability using challenge map / use GIS to download data
- Ensure enforceable commitments are accurate
- Subscribe to docket 5-BCH-2024 get updates
- Evaluate challenges to consider rebuttals

## Next Steps for Internet Service Providers:

- Ensure enforceable commitments are accurate
- Prepare for rebuttal to challenged service offerings
- Provide primary contact information to PSC

# BEAD Challenge Process Next Steps

- Carefully review the BEAD Challenge Process Instructions and Step-by-Step Instructions in docket 5-BCH-2024
- Attend the Webinar for BEAD Challenge Map:
  - Tuesday April 23<sup>rd</sup> 1pm. [Register here](#).
- BEAD Challenge Process Office Hours with UW – Extension and WBO
  - [Register here](#) for any of the following sessions: 9-10am on 5/1, 5/9, 5/16, 5/21
- Rebuttal period office hours
  - [Register here](#) for any of the following sessions: 9-10am on 6/6, 6/11, 6/18, 6/27



# ***QUESTIONS?***

For questions related to the BEAD Challenge process email:  
[PSCBEADChallenge@wisconsin.gov](mailto:PSCBEADChallenge@wisconsin.gov)

**Website:** <https://psc.wi.gov/Pages/ServiceType/Broadband/BEADChallenge.aspx>

**Subscribe to our Newsletter!** <https://lp.constantcontactpages.com/su/Uz6GZis>