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BSL Eligibility Cleanup Guidelines

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Summary

The South Carolina Broadband Office (SCBBO) is initiating a Broadband Serviceable Location (BSL) Eligibility Cleanup (BEC) phase in anticipation of the Broadband Equity Access and Deployment (BEAD) Program. During this phase, any existing Internet Service Provider (ISP) may identify current BEAD-eligible BSLs that meet one of the following two conditions:

- 1. <u>Location is Currently Served</u> and may be connected via a high-speed cable or fiber within 10 business days (with no aid in construction). Note, per NTIA guidance, the current FCC National Broadband Map must depict currently available qualifying broadband service at the location. The location's current service level must meet or exceeds the following criteria:
 - a. Unserved or Underserved BSL 100/20 Mbps; or
 - b. Community Anchor Institutions (CAIs) 1 Gbps symmetrical.

- **2.** <u>Location is Invalid</u> and ISP has evidentiary proof that the FCC fabric location is not a valid BSL.
 - a. Not applicable for Unserved/Underserved CAIs
 - b. Not applicable for a single BSL improperly placed within a parcel of land that includes a valid BSL

As described, BEC is intended remove BSLs from BEAD eligibility, thus making them unavailable for funding once they are approved by the SCBBO. Once BEC completes, the SCBBO will use the resultant set of BSLs for the Main Application Phase of the BEAD Program. In so doing, the SCBBO will minimize duplication of facilities and investment and streamline BEAD program processes.

The BEC guidelines below address the types of removals that may be accepted by the SCBBO along with the evidence required to be submitted based on the removal type. The final determination on removing BEAD-eligible BSLs will be at the sole discretion of the SCBBO. All determinations will be final.

NTIA <u>does not allow the addition of BSLs</u> for BEAD program eligibility. Therefore, BEC may only be used **to REMOVE BEAD-eligible** locations.

The SCBBO intends to use BEC as the final opportunity for ISPs to refine BEAD eligibility data. Once complete, the remaining BEAD-eligible BSL's will serve as a solution set for the Main Application Phase of the SC BEAD Program.

Background

The 2021 Infrastructure Investment and Jobs Act (IIJA) set forth a \$65 billion investment into broadband, for which \$42.45 billion is being administered by the National Telecommunications and Information Administration (NTIA) through the BEAD Program.

NTIA allocated \$551.5M of BEAD funding to provide financial support to install and deliver broadband infrastructure in unserved and underserved areas throughout South Carolina. Five (\$5) million of BEAD funds were provided to South Carolina in 2022 to support BEAD planning activities and develop the SC Five-Year Action Plan; therefore, \$546.5 million dollars remain eligible for investment.

The SCBBO concluded the formal BEAD Challenge process in July 2024. The Challenge produced the initial set of BEAD-eligible locations and that list was approved by NTIA in September 2024. As a result of work performed by ISPs deploying additional facilities during the intervening period, it is clear that additional BSLs should be removed and no longer considered for BEAD funding. Accordingly, the BEC will refine and reduce the approved set of BEAD-eligible points. The BEC is not intended to supplant or duplicate efforts that have already been approved, but rather, 'clean up' the eligible BSLs that meet the criteria outlined in this guidance to streamline and maximize the use of funding available as part of the SC BEAD program.

Who is Eligible to Submit?

Any existing ISP providing broadband service in South Carolina.

Timeline

Event	Date/Deadline
BEC Submission Opens	4/2/2025
SCBBO BEC Webinar	4/8/2025
BEC Submission Closes	4/30/2025
SCBBO Begins BEC Submission Reviews	5/1/2025

What to Submit?

ISPs seeking to remove BSLs from the BEAD eligibility map, which they believe qualifies for BEC in item one or two outlined in the summary section of this document and as shown in the No-BEAD Table below. ISPs must submit a subset of the [Proposed_Served_Structures_04022025] file as a csv, located in the Citrix ShareFile [BEAD-Maps and Data] folder. Each location must contain a corresponding GIS Code from the No-BEAD Table relating to the reason the ISP requests the location be removed from the BEAD-eligible locations list.

The location file submitted by the ISP must be formatted as Comma Separated Values (.csv) and uploaded to the [Location File (csv)] folder on Citrix with all fields completed. In addition to the location file, supporting evidence **MUST** be submitted and uploaded to Citrix ShareFile at the individual location level using the FCC Location ID and GIS Code as the file name of the corresponding evidence being submitted.

The SCBBO will need to associate the evidentiary proof provided by the ISP with the corresponding record in the CSV file uploaded to Citrix ShareFile in the [Evidence] folder. The acceptable required corresponding supporting evidence for each location submitted by the ISP is outlined in the No-BEAD Table below.

Data Fields

Field Name	Location_i	Lat	Lon	Eligibilt	FCC_Addr	GIS_Code	Filename	Actual_Add	Tech	Comment
Field Type	integer	float	float	text	text	text(2)	text	text	integer	text
Description	*Pre-Populated by SCBBO FCCLocation_ID sourced from the SCBEAD Bigibility Map	coordinates	*Pre-Populated by SCBBO Latitude coordinates sourced from the SCBEAD Bigibility Map	*Pre-Populated by SCBBO Bigibility Status sourced from SC BEAD Bigibility Map	sourced from the SCBEAD	GIS_Code from SCBBO's No- BEAD Table	File name of supporting evidentiary proof uploaded to Otrix. Multiple files to be separated by comas. Filenames must be saved as the corresponding location_id and GSCode	Address of location if different than FCC_Addr field components IF DIFFERENT: Address must match supporting evidentiary proof	FCCTech code CONDITIONAL; only applicable for GIS_Code = 2 40 = Coaxial Cable / HFC 50 = Optical Carrier / Fiber to the Premises	Additional comments
Example	12345678	99.99999	-99.99999	Unserved	111 Main St, Columbia SC 29210	2	12345678_2.jpg	123 Main St, Columbia SC 29210	50	Location includes multiple examples of evidentiary proof

No-BEAD Table

Reason Code	Sub-Code	Evidence	GIS_Code
1: Location should not have a broadband connection (Not applicable for a single BSL improperly placed within a parcel of land that includes a valid BSL)	D: Location has been demolished and is not expected to be rebuilt	 Attestation from unit of government or property owner (e.g., zoning or land use change) Geotagged Photographic evidence (no aerial imagery for structure) 	1D
	U: Location is a support structure (e.g., a garage, parking structure, barn, silo, storage shed) to a nearby building	 Attestation from unit of government or property owner Geotagged Photographic evidence (no aerial imagery for structure) 	1U
	R: Location is not a building but a land or natural formation, such as a large rock or collection of hay bales	 Attestation from property owner Geotagged Photographic evidence (no aerial imagery for structure) 	1R
2: Location is already served by non-subsidized service (privately funded network) and no aid in construction or cost to hookup to the consumer. The current FCC National Broadband Map must depict currently available qualifying broadband service at location.	N/A	Evidence of subscription (service record showing a minimum of 100/20 for a non-CAI location, or 1 Gig-symmetric for CAIs) Evidence of service available (screenshot of available service depicting a minimum of 100/20 for a non-CAI location, or 1 Gig-symmetric for CAIs) Single Sheet of Stamped Engineering as-built showing fiber or cable drop to the location and date built Speed test (showing a minimum of 100/20 for a non-CAI location, or 1 Gig-symmetric for CAIs)	2

Detailed Explanation of Evidence

The following are acceptable forms of evidence ISPs may provide to explain why a location should be removed from the SC BEAD-eligible locations list, and thus, if approved by the SCBBO, resulting in the location being unavailable for BEAD funding:

Geo-Tagged Photographic Evidence: Photographic evidence must be a JPEG file, timestamped and geocoded with three decimal digits resolution part of longitude and latitude. The photo should show a terrestrial (street-level) view. Only if the ISP is restricted from accessing the location, it may rely on aerial or satellite images that is up to date and clear along with a justification on why terrestrial photographic evidence could not be collected.

Attestation by a Unit of Local or Tribal Government: An attestation by a unit of local or Tribal government, agency of the federal government, or other government entity owning the location must be dated and retained as a PDF file. Attestations for locations on Tribal Lands must be made by a representative of the Tribal government. The signatory must be identified by title as a representative of the unit of local or Tribal government or federal government agency. The signature may be either digital or scanned. If a single attestation applies to multiple locations, the attestation should list all Location IDs and must be submitted for each location.

Attestation by Private Property Owner: An attestation by a private property owner should be retained as a PDF file. It should contain a date and a digital or scanned signature. If a single attestation applies to multiple locations, it should list all FCC Location IDs sourced from the SCBBO BEAD Eligibility Data and must be submitted for each location.

Land use or zoning change: Documentation of a land use or zoning change should include an attestation by a unit of government for the jurisdiction.

Evidence of Subscription (Service Record): Evidence of subscription must be preserved as a PDF file and must contain a date. Any personally identifiable information should be redacted. The evidence of subscription should indicate the service address, the name of the service provider, the technology type, and the speed tier. Service record must show a minimum of 100/20 for a non-CAI location, or 1 Gig-symmetric for CAIs.

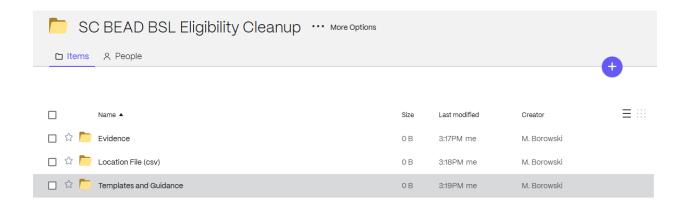
Evidence of Service Available: Evidence of service available must be preserved as a PDF file and must contain a date. The evidence of service should indicate the service address, the name of the service provider, and the speed tier. The record must show a minimum of 100/20 for a non-CAI location, or 1 Gig-symmetric for CAIs.

As-Builts: Single sheet of stamped Engineering as-built showing fiber or cable drop to the location and date built.

Network Speed Test: The speed test results can be recorded in a PDF or CSV file. Speed tests must follow protocols outlined in NTIA's Model Challenge Process or the SCBBO's approved Initial Proposal Volume I.

How to Submit

ISPs will submit a Comma Separated Values (.csv) file to the [Location File (csv)] Folder on Citrix ShareFile. Evidentiary proof at the location level will be submitted to the [Evidence] Folder on Citrix ShareFile. Issues or questions accessing the SC BEAD Program Citrix platform can be submitted to BEAD@ors.sc.gov.



Determinations

All ISPs participating in BEC are advised that the requisite review process conducted by the SCBBO is subject to stringent and comprehensive evaluation, demanding meticulous attention to detail to facilitate accurate determinations. This is because the successful removal of BSLs from the BEAD Program eligibility map comes at the risk of inadvertently leaving out a home, business, or CAI from potential access to broadband, which may negate the overall goal of the BEAD program; Internet for All.

Therefore, approvals may only occur when an ISP provides sufficient evidentiary proof paired with using the permissible GIS Codes included as part of this guidance. Under the BEC phase, no deviation from the removal type will be accepted by the SCBBO.

The SCBBO will review all locations submitted along with the evidentiary proof to make a final determination based on whether the location meets the criteria outlined in this guidance. If the SCBBO determines the location along with the evidence submitted meets BEC criteria, the location will be removed from BEAD-eligibility. The SCBBO will designate accepted BSLs as "No BEAD" locations in the SC BEAD Final Proposal.

The SCBBO may also determine the location submitted along with the evidence does not meet the criteria outlined in this guidance, thus leaving the location in the list of BEAD eligible locations and available for BEAD funding.

The final determination on removing BEAD-eligible BSLs will be conducted at the sole discretion of the SCBBO and the SCBBO may request additional information. All determinations will be final.

Final Results

Upon completion of BEC, the SCBBO will publish all remaining BSL's to serve as locations eligible for SC BEAD program funds. In addition, a final list of locations with final determinations will be uploaded to Citrix ShareFile.