South Carolina BEAD Challenge Process Guidebook

Broadband Equity, Access, and Deployment (BEAD)

March 2024

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Glossary

Broadband Serviceable Location (BSL)

According to the FCC, 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."

Community Anchor Institution (CAI)

A school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, public housing organization (including any public housing agency, HUD-assisted housing organization, or Tribal housing organization), or community-support organization that facilitates greater use of broadband service by vulnerable populations including, but not limited to, low-income individuals, unemployed individuals, children, the incarcerated, and aged individuals.

Funded location

A location with state, local, or federal funding commitment.

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.

Reliable Broadband Service

Broadband service that the Broadband DATA Maps show is accessible to a location via:
- Fiber-Optic technology: Tech Code = 50;
- Cable Modem/ Hybrid Fiber-Coaxial technology: Tech Code = 40;
- Digital Subscriber Line (DSL): Tech Code = 10;
- Terrestrial Fixed Wireless technology utilizing entirely licensed spectrum or using a hybrid of licensed and unlicensed spectrum: Tech Code = 71;

Screenshot

An image of the data displayed on the screen of a computer or mobile device.

Served location

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

Underserved location

A BSL that the broadband DATA and Maps show as lacking access to Reliable Broadband Service offered with greater than Unserved (25/3) but;
- A speed less than 100/20 Mbps for download/upload
- Latency greater than or equal to 100 milliseconds
- Any location affected by the ORS modification (DSL and Cellular Fixed-Wireless)

Unserved location

A BSL that the broadband DATA and Maps shows as;
- Having no access to broadband service
- Lacking access to reliable broadband service
- A speed of less than 25/3 Mbps for download/upload
- Latency greater than or equal to 100 milliseconds

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. The National Telecommunications and Information Administration (NTIA) is charged with administering the program. The NTIA allocated approximately $551.5M in BEAD funding to South Carolina.

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

1. Connect Unserved locations

2. Connect Underserved locations

3. Connect eligible CAIs 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 South Carolina broadband map identifies every unserved and underserved location and eligible CAI so that BEAD funds are deployed where they are needed.

II   When will the Challenge Process take place?

The South Carolina Broadband Office (SCBBO) has published all served, unserved, and underserved locations as well as the location and eligibility of all community anchor institutions (CAIs) in CSV format which is available on the BEAD webpage at: https://ors.sc.gov/broadband/office/investments/state/bead

Eligible challengers and the public will have the opportunity to review location designations before the South Carolina BEAD Challenge Portal goes live. The Challenge Phase will officially begin on April 15, 2024. Links to the 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, is referenced throughout this user guide and will also be located on the BEAD page hyperlinked above.

South Carolina BEAD Challenge Process Phases and Timeline

Phase	Duration and Dates
Publication of Eligible Locations *Public documentation shall be 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.* *The SCBBO informs units of local government, non-profits, and internet service providers (ISPs) about the Challenge Process timeline, deadlines, and how each will be notified of challenges.*	7 days April 8, 2024 – April 15, 2024
Challenge Phase *Challengers will be notified by the SCBBO as to whether their challenge is sustained (accepted) or rejected (declined). ISPs that were challenged will be pre-notified about any location challenges via email and file uploaded to their organization's prospective Citrix folder.*	30 days April 15, 2024 – May 14, 2024
Rebuttal *The Rebuttal phase officially begins as set forth in the timeline. All service level challenges will be posted to Citrix for each respective ISP to officially rebut. Planned Service, Enforceable Commitment, and CAI challenges will be posted via web map for all registered challengers to submit a Rebuttal.*	30 days May 15, 2024 – June 14, 2024
Final Determination *The SCBBO will post all submitted challenges and rebuttals before final challenge determinations are made. The SCBBO shall make final determinations and submit to the NTIA for their final review.*	30 days June 15, 2024 – July 14, 2024
Publication of Final Determinations *The SCBBO publishes the final determinations after NTIA review.*	Early Summer of 2024 based on approval from NTIA.

1. **Publication of Challenger Registration Form: March 1ˢᵗ, 2024**

The following entities are the only allowable challengers.

- Broadband Service Providers
- Non-Profits
- Units of Local and Tribal Governments

Each individual belonging to the above list must register to participate in the BEAD Challenge Process using the following link https://arcg.is/1SGqer . The registrant must provide information to substantiate they work/belong to the entity they are registering under. Upon registering, and the SCBBO accepting the registration, the user will receive an email with a unique PIN number that must accompany any challenges they may submit. If the PIN number assigned to a challenger does not match the challenger's email address submitting the challenge or rebuttal, the challenge or rebuttal will be rejected. The reason for this validation is so the SCBBO can verify a valid registrant submitted the challenge and/or rebuttal.

2. **Publication of Eligible Locations: April 8, 2024 – April 15, 2024**

The list and map of eligible locations will be located here: https://ors.sc.gov/broadband/office/investments/state/bead The map is based on the FCC National Broadband Map last update. Data on BSLs is based on availability reported in the FCC BDC as of September 15, 2023, using version 3.2 of the FCC BDC fabric.

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 are not exclusively served by DSL or Cellular based Fixed-Wireless, and with latency of 100 milliseconds (ms) at most.

  › BSLs have also 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, SCBBO funding rounds, etc. These are considered Enforceable Commitments.

- 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 or that are served exclusively by DSL or Cellular based Fixed-Wireless advertising speeds greater than 25/3Mbps.

- Unserved BSLs, which are locations that lack access to reliable broadband service with speeds less than 25/3 Mbps.

- Identification of eligible community anchor institutions (CAIs) (e.g., colleges and universities, schools, hospitals, libraries, etc.) which can be found on the national broadband map.

3. **Challenge Phase: April 15, 2024 – May 14, 2024 (30 days)**

During the challenge phase, eligible registrants can submit challenges and supporting evidence through the SCBBO BEAD Challenge Portal. If the required evidence for the given challenge type is not submitted, the challenge will not be accepted. (Please see Section V for more details on accessing and using the SCBBO BEAD Challenge Portal and Section IV for more details on challenge types and evidentiary requirements.) All challengers will receive an email after the SCBBO reviews the challenge and will be notified that the challenge was sustained or rejected. If the challenge was rejected, the reason for the rejection will be provided in the email and the challenger will have the option to resubmit the challenge during the 30-day challenge phase (Email notifying that the challenge was denied may come after the 30-day challenge period in which case a new challenge will not be able to be submitted). Conversely, the ISP being challenged will be pre-notified (if registered as a challenger) through email that an updated list of challenges with the location ID and the type of challenge was uploaded in their perspective Citrix Sharefile folder.
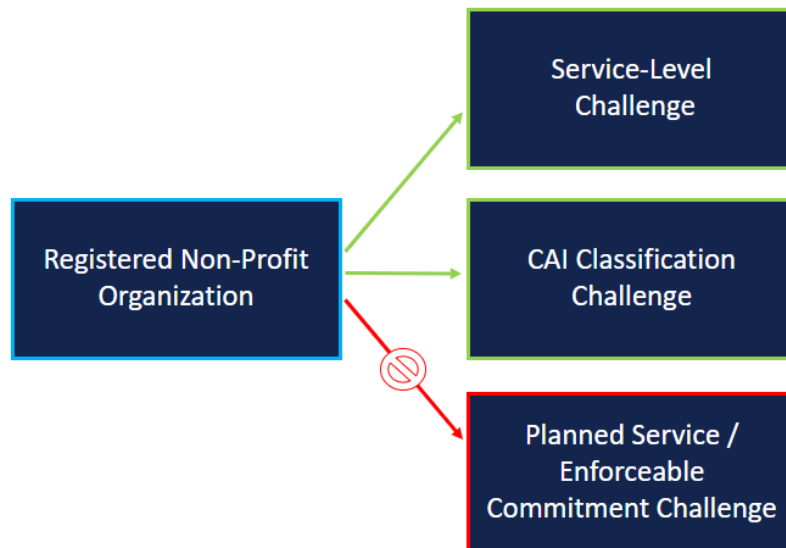
Who can participate in the Challenge Process?
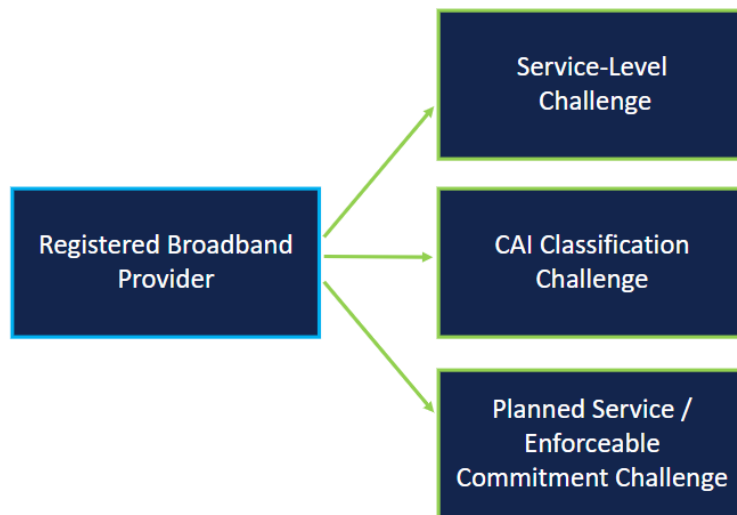
Permissible Challenge Types for Broadband Service Providers
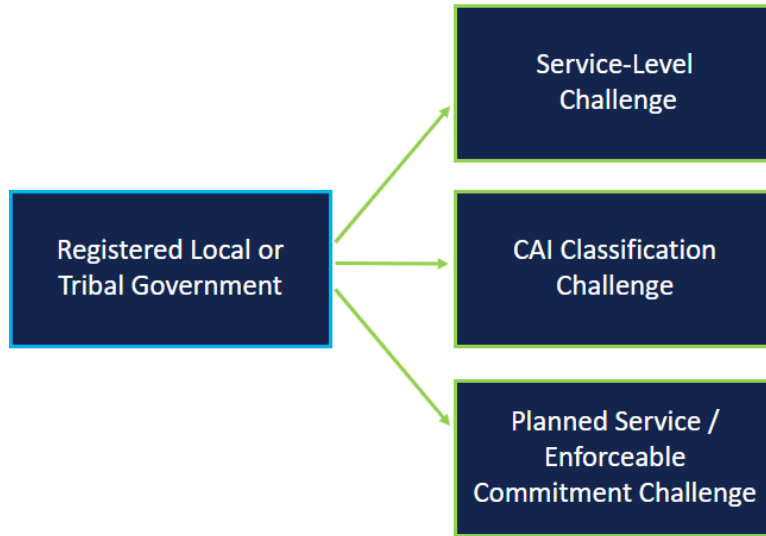
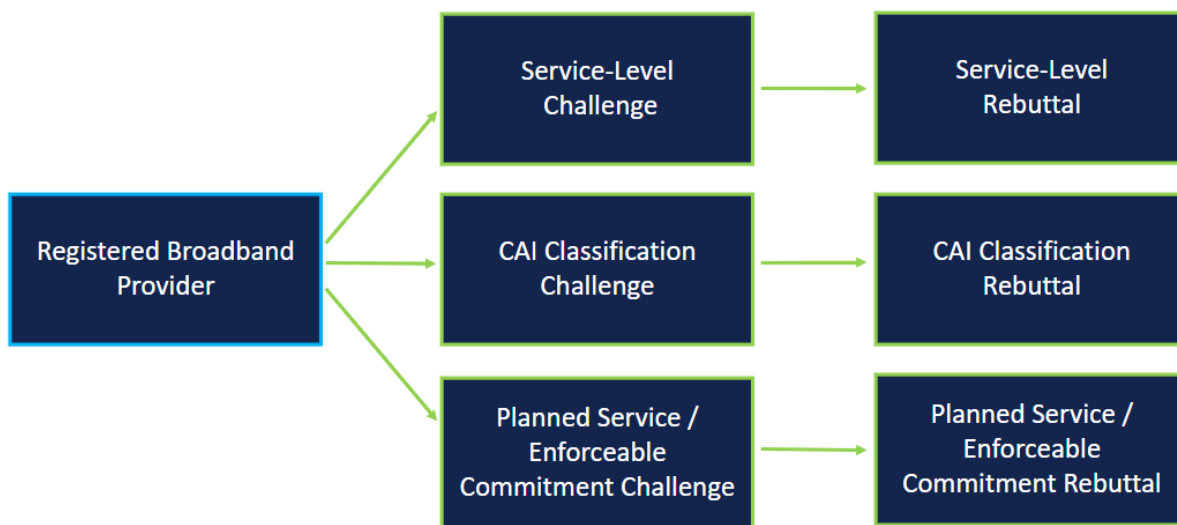**Permissible Challenge Types for Units of Local or Tribal Government**

Permissible Challenge Types for Non-Profit Organizations

4. **Rebuttal Phase: May 15, 2024 – June 14, 2024 (30 days)**

During the Rebuttal Phase, challenged ISPs will have been pre-notified of the location ID being challenged along with the type of challenge through email and the file of the

locations in their Citrix Sharefile folder. Each registered challenger will be notified the rebuttal period has opened and the rebuttal file will be placed in each ISP's organizational folder with all the pertinent information. Within this file there is unique link/URL for each challenge at the location level that must be used to submit a rebuttal. Challengers must submit a rebuttal with supporting evidence through the link provided. This link must be used so that rebuttal evidence is properly associated with the location that was challenged. For rebuttals relating to Planned Service, Enforceable Commitments, and CAIs a web app link will be provided to all registered users, the web app will be used to submit those types of rebuttals to the SCBBO. Registered users will be able to see the locations on the map for Planned Service, Enforceable Commitments, and CAI Classification, and will be able to select locations one at a time to submit a rebuttal. (Please see Section IV for more details on evidentiary requirements for rebuttals pertaining to these challenge types.)
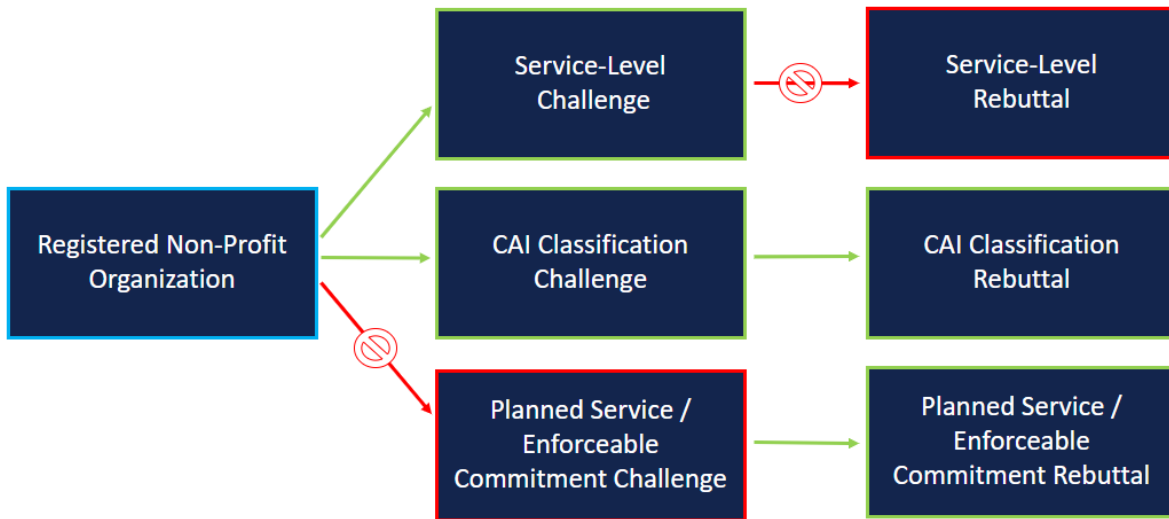
Who can participate in the Rebuttal process?

Permissible Rebuttal Types for Broadband Service Providers
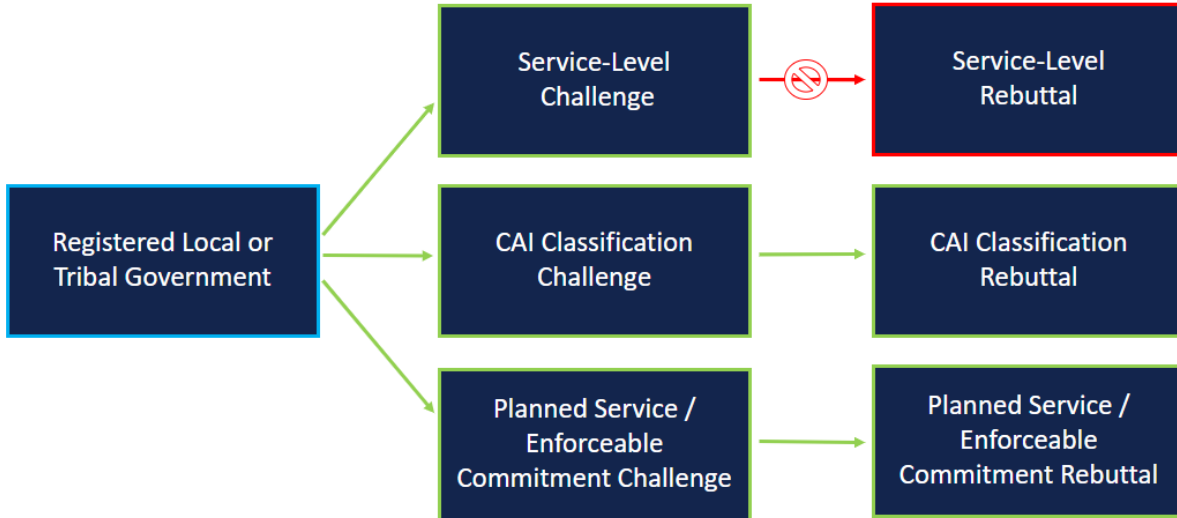
Permissible Rebuttal Types for Units of Local or Tribal Government

Permissible Rebuttal Types for Non-Profit Organizations

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

- The provider, non-profit, or unit of local or tribal 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 SCBBO 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 SCBBO will review the basis and summary of all challenges and rebuttals to ensure that PII is removed prior to posting them on the website. All other data and associated information may be published as part of the Map Challenge Process.

The SCBBO 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, and/or proprietary 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.

5. **Final Determination: No later than July 14, 2024**

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

- If the SCBBO sustains the challenge and a rebuttal is either not submitted, incomplete, or not accepted, the challenge is upheld, and the classification of the BSL or CAI changes.

- If the SCBBO sustains the challenge and a rebuttal is accepted against the challenge, the classification of the BSL or CAI does not change.

- If the SCBBO rejects the challenge, the challenge is not upheld, therefore the classification of the BSL or CAI does not change.

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 been recently funded (including any potential amendments to existing grant agreements) by the SCBBO and may update to the new public BDC data. Then, the SCBBO 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 SCBBO will publish the BEAD Challenge Map Results which will serve as the final list of eligible locations for the BEAD grant program. This will occur at least 60 days prior to allocating grant funds. The Final Determination results will be posted on the BEAD webpage at: https://ors.sc.gov/broadband/office/investments/state/bead

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[1]:

- Units of local or tribal government

- Non-profit organizations

- Internet service providers (ISP)

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

Registration will be available on a rolling basis and can be initiated by visiting: https://arcg.is/1SGqer

Organizations must register before the Challenge Process to ensure prompt access to credentials that will allow them to use the SCBBO BEAD Challenge Portal. Creating credentials and verifying that challengers are eligible to participate could take up to three business days, therefore eligible challengers are encouraged to register as soon as possible. *To allow time for verification and credential generation, registration will close on May 14, 2024, at 8:00am EST.*

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

Individual residents and businesses (other than internet service providers) in South Carolina can participate in the Challenge Process in the following way:

- Contact a unit of Local Government and/or Tribe requesting that the entity submit a challenge on their behalf.

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[1] 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 SCBBO 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 SCBBO 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

CAI type	Category and definition (if necessary)
School	Public K-12 schools participating in the FCC E-Rate program or public schools that have an NCES (National Center for Education Statistics) ID in the categories "public schools" or "private schools", or as designated by the SC Department of Education (SCDOE). Private schools: 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.
Libraries	Including all libraries participating in the FCC E-Rate program as well as all member libraries and their branches of the American Library Association (ALA) or as designated by the SC State Library system.

Public housing organizations	Public housing organizations were identified by contacting the Public Housing Agencies (PHAs) for the state or territory enumerated by the U.S. Department of Housing and Urban Development. The nonprofit organizations Public and Affordable Housing Research Corporation (PAHRC) and National Low-Income Housing Coalition maintain a database of nationwide public housing units at the National Housing Preservation Database (NHPD).
Health clinic, health center, hospital, or other medical providers	The list of rural health clinics, rural health centers, hospitals, and other medical providers includes all institutions that have a Centers for Medicare and Medicaid Services (CMS) identifier.
Public Safety Entity	The list includes entities such as fire houses, emergency medical service stations, police stations, and public safety answering points (PSAP), based on records maintained by the Eligible Entity and units of local government. The list of public safety answering points (PSAPs) includes all PSAPs in the FCC PSAP registry.
Institutions of Higher Education	Institutions of higher education include all institutions that have an NCES ID in the category "college," including junior colleges, community colleges, minority serving institutions, historically black colleges and universities, other universities, or other educational institutions.
Community Support Organizations	The Eligible Entity included any organizations that facilitate greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals. The Eligible Entity included senior centers and job training centers in this category. The Department of Labor maintains a database of "American Job Training" training centers, established as part of the Workforce Investment Act, and reauthorized in the Workforce Innovation and Opportunities Act of 2014. The database can be accessed at the American Job Center Finder. The National Council on Aging (NCOA) helped identify senior centers.

Table 2: Allowed Challenge Types and Examples of Evidence

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).	Screenshot of provider webpage. A service request was refused within the last 180 days (e.g., an email or letter from a provider). Lack of suitable infrastructure (e.g., no fiber on pole). 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.[2] 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.	Provider shows that the location subscribes or has subscribed within the last 12 months, e.g., with a copy of a customer bill. If the evidence was a screenshot and believed to be in error, a screenshot that shows service availability. 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.

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[2] 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.[3] 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 along with a screenshot showing the subscription tier that the challenger's location is subscribed to.	Provider has countervailing speed test evidence showing sufficient speed— e.g., from their own network management system.
L	Latency	The round-trip latency of the broadband service exceeds 100ms.[4]	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 Connect America Fund (CAF) performance measurements.[5]
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.

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[3] 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.

[4] *Performance Measures Order*, including provisions for providers in non-contiguous areas (§21).

[5] Ibid.

Code	Challenge type	Description	Evidence: Specific examples	Permissible rebuttals
		cap") on the consumer.[6]		
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).

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[6] 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	Planned	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. OR Location has existing service available that is not currently reflected in the availability data.	For planned service: Construction contracts or similar evidence of on-going deployment, along with evidence that all necessary permits have been applied for or obtained. 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.	Documentation showing that the provider is no longer able to meet the commitment (e.g., is no longer a going concern) or that the planned deployment does not meet the required technology or performance requirements.
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. (See BEAD NOFO at 36, n. 52.)	Declaration by service provider subject to the enforceable commitment.	

Code	Challenge type	Description	Evidence: Specific examples	Permissible rebuttals
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.	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 broadband office will accept speed tests as evidence for substantiating challenges and rebuttals. Each speed test consists of three measurements, taken on different days. Speed tests cannot predate the beginning of the challenge period by more than 60 calendar days. Speed tests can take the following forms:

1. A screenshot of the reading of the physical line speed provided by the residential gateway, (i.e., ONT (for FTTH), or fixed wireless subscriber module.
2. A screenshot of the reading of the speed test available from within the residential gateway web interface.
3. A screenshot of the reading of the speed test found on the service provider's web page.
4. A screenshot of the speed test performed on a laptop or desktop computer within immediate proximity of the residential gateway, using a [NTIA-approved speed test application listed below.]

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).

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

Each location must conduct three speed tests on three different days; the days do not have to be adjacent. The median of the three tests (i.e., the second highest (or lowest) speed) is used to trigger a speed-based (S) challenge, for either upload or download. For example, if a location claims a broadband speed of 100 Mbps/25 Mbps and the three speed tests result in download speed measurements of 105, 102 and 98 Mbps, and three upload speed measurements of 18, 26 and 17 Mbps, the speed tests qualify the location for a challenge, since the measured median upload speed marks the location as underserved (e.g., 102/18).

Speed tests may be conducted by subscribers, but speed test challenges must be gathered and submitted by units of local government, non-profit organizations, or a broadband service provider.

Subscribers submitting speed tests, to eligible challenges, must indicate the speed tier they are subscribing to. Since speed tests can only be used to change the status of locations from "served" to "underserved", only speed tests of subscribers that subscribe to tiers at 100/20 Mbps and above are considered. If the household subscribes to a speed tier of 100/20 Mbps or higher and the speed test yields a speed below 100/20 Mbps, this would be a permissible challenge and considered 'underserved' if not properly rebutted. However, even if a particular service offering is not meeting the speed threshold, the eligibility status of the location may not change. For example, if a location is served by 100 Mbps licensed fixed wireless and 500 Mbps fiber, conducting a speed test on the fixed wireless network that shows an effective speed of 70 Mbps does not change the status of the location from served to underserved.

**Acceptable Speed Test Applications:
NTIA has approved the following applications for conducting speed tests:
- Ookla (https://[www.speedtest.net/)](www.speedtest.net/)
- M-Lab (https://speed.measurementlab.net/#/)
- Cloudflare (https://speed.cloudflare.com/)
- Netflix (https://fast.com/)
- Speed test sites operated or sponsored by the Eligible Entity (including commercial test aggregators)

V How to use the SCBBO BEAD Challenge Portal

Register to Participate in Challenge Process

All eligible challengers that wish to participate in the Challenge Process and access the SCBBO BEAD Challenge Portal must register at https://arcg.is/1SGqer .

Once a registration form is submitted, the SCBBO will verify the requesting entity's eligibility and will then send an email confirming the entity's registration. In the event the SCBBO receives incomplete or information they cannot validate, they will make an attempt (time permitting) to reach out to the registrant to gather what is needed to finish the registration process, otherwise, the user will not be able to participate in the BEAD Challenge Process. Updates regarding launches of the BEAD Challenge Map and South Carolina BEAD Challenge Portal, as well as training webinars and resources, will be sent to registered challengers.

Registration in advance of the Challenge Process is highly recommended but will also be accepted during the challenge window. Registration will open on March 1st, 2024, and close May 14, 2024. To participate in the rebuttal phase, all participants must be registered before the challenge period closes.

The following information is required to complete the registration form (as shown in the

screenshot above):

- For all respondents: Contact information, including name, phone number, email organization type, organization name, organizations website, and organization notification email.

- Additional required information for internet service providers: Company name, FCC registration number (FRN) is required.

- Additional information is requested for non-profits: UEI number and/or EIN number.

Challenge Registration Acceptance:

1. To verify all information submitted to the SCBBO during the challenge registration is accurate, an email will be sent to the registrant within 3 business days confirming their registration information.

2. If the registrant confirms all the information is accurate. The registrant will be accepted as a valid challenger by the SCBBO and sent an email with a unique PIN they **MUST** use for all challenges and rebuttals**. This PIN must match the email associated with the registration for all challenges or rebuttals or the challenge or rebuttal will be rejected.**

Preparing to Submit Challenges:

Challenges to a BSL will require the use of the SCBBO Challenge Portal map along with a separate challenge form for planned service and enforceable commitments. To submit a challenge, the challenger will search for an address or zoom to a location on the map they wish to challenge. As you zoom in, BSLs will be symbolized based on September 2023 FCC BDC submissions and known investments. Note, areas where known investments have occurred will be symbolized on the map as green (served). The challenger will then click the location they wish to challenge.

A location can be challenged in two ways:

(1) Searching by an address/or zooming to a location then clicking the location that will be challenged. Once the location is clicked/selected, information will populate on the right-hand pane for the challenger's review.

- If the location is served, the challenger can click the link in the right-hand pane for the

provider's stated service they wish to challenge and fill out the challenge form.

- If the location's CAI classification is incorrect, the challenger can click the link in the right pane stating CAI Classification Challenge and fill out the form.

(2)   If the challenger wants to submit a planned service or enforceable commitment challenge, there is a link for a form and guidance on bulk upload requirements. Challengers must fill out the form for each project submitted and attach the required backup for the selected challenge type, See Table 2. A separate location file using version 3.2 of the FCC BDC fabric must be uploaded to the challenger's Citrix folder, a template will be provided by the SCBBO and published to the BEAD webpage. Each completed template file must be uploaded to the prospective organization's challenge folder which will be created by the SCBBO upon an accepted registration.

NOTE: All challenges submitted will require the challenger to submit their email address and PIN number on the challenge form. **If the email address does not match the PIN assigned by the SCBBO the challenge will be rejected.**
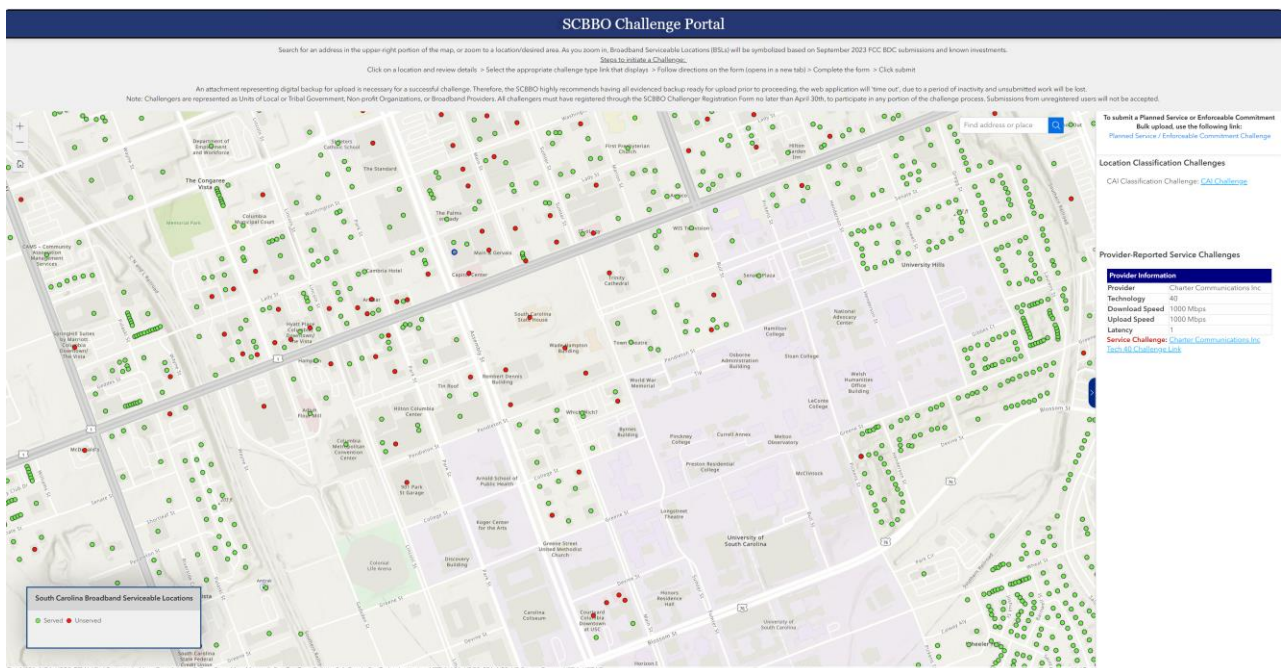
Locations on the map:

I.   If a community anchor institution (CAI) is...

   a.   Red Star, it is <u>eligible</u> for funding because it has been designated as unserved (without access to 1 Gbps symmetrical service).

   b.   Green Star, it is <u>not eligible</u> 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. Red, it is <u>eligible</u> for funding because it has been designated as unserved or underserved.

    b. Green, it is <u>not eligible</u> for funding because it has been designated as served.

Submitting a Challenge

Step 1: Search for a location, click the location you want to challenge, and then click one for the three links in the right-hand pane for the type of challenge you wish to submit (See Image below).

To submit a Planned Service or Enforceable Commitment
Bulk upload, use the following link:
Planned Service / Enforceable Commitment Challenge

Location Classification Challenges

CAI Classification Challenge: CAI Challenge

Provider-Reported Service Challenges

Provider Information	
Provider	Charter Communications Inc
Technology	40
Download Speed	1000 Mbps
Upload Speed	1000 Mbps
Latency	1

Service Challenge: Charter Communications Inc
Tech 40 Challenge Link

Types of Challenges

Service Challenge: This is a challenge against an ISP's stated service.

To initiate a service challenge, click the link in the "Provider-Reported Service Challenges" box. Provider-Reported Service Challenges may or may not have multiple ISPs reporting service at a single location. If multiple ISPs are reporting service at the location an arrow

will appear at the top of the provider information box and the challenger must select the ISP they wish to challenge. The link will open a form in a new tab "Provider-Level Service Challenge", and this is where all service challenges and all associated required back-up evidence is submitted.

Planned Service / Enforceable Commitment Bulk Upload Challenge
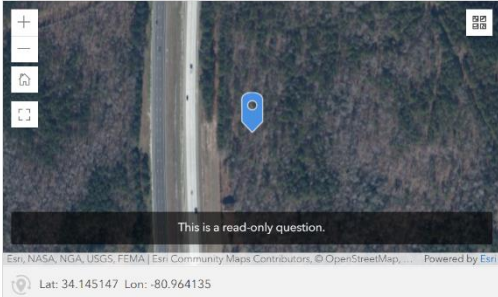
Challengers who wish to submit a planned service or enforceable commitment challenge will need to click the link located on the right-hand pane inside of the BEAD Challenge Portal, labeled "Planned Service / Enforceable Commitment Challenge". Challengers must fill out the form for each project submitted and attach the required backup for the selected challenge type, See Table 2. A separate location file using version 3.2 of the FCC BDC fabric must be uploaded to your Citrix folder following the template format provided here https://ors.sc.gov/broadband/office/investments/state/bead. Each completed template file must be uploaded to the prospective organization's challenge folder which will be created by the SCBBO upon an accepted registration.

To submit a Planned Service or Enforceable Commitment Bulk upload, use the following link:
Planned Service / Enforceable Commitment Challenge

Planned Service / Enforceable Commitment

This form may only be used for Planned Service or Enforceable Commitment challenges. If you wish to submit a Provider Level Challenge or a CAI Classification Challenge, please close this form, return back to the SC Bead Challenge Portal Application, and chose the correct challenge form link.

Challengers must fill out the form for each project submitted and attach the required backup for the selected challenge type, See Table 2 in the User Guide. A separate location file **using Version 3.2 of the FCC BDC Fabric** must be uploaded to your Citrix folder following the template format provided here: Planned Service / Enforceable Commitment Template . Each completed template file must be uploaded to the prospective organization challenge folder which will be created by the SCBBO upon an accepted registration.

Name*
Please provide us with your first and last name.

Email*
Please provide us with the email you used to register for the SCBBO BEAD Challenge.

Phone Number*
Please provide us with your phone number.

Organization*
Please provide us with the name of the organization you represent.

PIN*
Please enter the PIN assigned to you by the SCBBO.

Challenge Type*
Please select the appropriate challenge type.

-Please select-

Project Name*
This project name must also be the name of the template file uploaded to Citrix.

Download Speed Provided*
If not the same for all locations, please describe in the bulk upload template by each location.

Upload Speed Provided*
If not the same for all locations, please describe in the bulk upload template by each location.

Technology Provided by FCC Tech Codes*
If not the same for all locations, please describe in the bulk upload template by each location.

Challenge Evidence*
See User Guide Table 2 for required evidence based on the selected challenge type. Condense all evidence into a single pdf for upload. If the evidence provided does not match the types of evidentiary proof permissible, the challenge will be rejected.

Drop file here or select file (pdf)

Challenge Comments

1000

Acceptance of Terms*

I hereby affirm that, to the best of my knowledge, information, and belief, the challenge submission and associated evidentiary proof (i.e. uploaded attachments) provided for consideration under the SCBBO BEAD Challenge process are complete and accurate.

I further certify that, to the best of my knowledge, information, and belief, all information included in this submission is factual and correct. I permit SCBBO to share and publish, with the exception of any PII, the information I have input into this form following the requirements set forth by the BEAD program and NTIA.

☐ I Accept the Terms and Agreement

Community Anchor Institution Classification Challenge

Challengers who wish to submit a community anchor institution classification challenge will need to click the link located on the right-hand pane. Challengers must fill out the form and upload the required backup information.
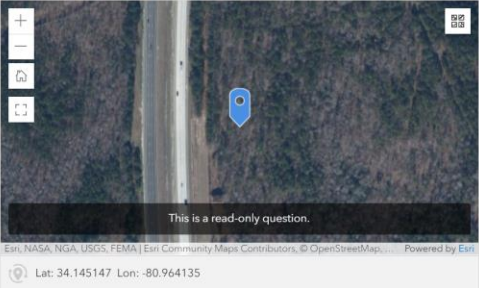
Challenge Submitted

- Once a challenge is submitted, within 1 business day the map will reflect the point has been challenged. The location will be displayed on the map with a circle drawn around it.

- The SCBBO reviews the challenge and determines if the challenge is sustained or rejected. The challenger will be notified by email whether the location they challenged has been accepted by the SCBBO or rejected. If the challenge was rejected, the reason for the rejection will be in the email.

- For any service challenges the SCBBO will pre-notify the service provider of the challenge through email. In the email the service provider will be notified of the location ID being challenged and challenge type, as well as information regarding a file containing the challenged location and challenge type has been uploaded by SCBBO to their perspective Citrix Sharefile folder.

Submitting Rebuttals

The rebuttal period will commence at the conclusion of the challenge period. Rebuttal period dates are May 15, 2024 – June 14, 2024. (30 Days)

When the Rebuttal Phase opens, notifications will be sent to eligible challengers as formal notice that the challenges are open for rebuttal.

Planned Service, Enforceable Commitments, and CAI Classification Rebuttals

- 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.

- These types of rebuttals will be conducted through the rebuttal map located here: https://ors.sc.gov/broadband/office/investments/state/bead

- The challenger will search or zoom and select the location they wish to rebuttal.

- A rebuttal link will display on the right-hand pane and when clicked will open a rebuttal form which must be used to submit the rebuttal.

- The rebuttal form will require the challenger to enter their email and PIN they received during the registration. Any PIN that does not match an email in the rebuttal will be rejected.

Service Level Rebuttals

- All registered ISPs will be notified the rebuttal period has opened and will be given a list containing all challenges against their service they can rebut.

- The list will be uploaded to the provider's specific folder on Citrix.

- This list will contain the Location ID that was challenged, the type of challenge, and a specific link to each record for a rebuttal form.

- ISPs must use the link in the list for the rebuttal and upload all their evidence through the form.

- Rebuttals must be completed for each challenge, even is the location and/or challenge type is duplicated.

- This form will require the challenger to enter their email and PIN they received during the registration. Any PIN that does not match an email in the rebuttal will be rejected.

Challenged Provider	Challenged ProviderID	Challenge Type	Location ID	Rebuttal Link
XYZ Internet Provider	123123	Availability	123456	https://survey123.arcgi
XYZ Internet Provider	123123	Speed	123457	https://survey123.arcgi
XYZ Internet Provider	1231	Speed	12345	https://survey123.arcgi
XYZ Internet Provider	231	Business Or Service	12345	https://survey123.arcgi
XYZ Internet Provider	231	Availability	12346	https://survey123.arcgi
XYZ Internet Provider	231	Availability	12346	https://survey123.arcgi
XYZ Internet Provider	1231	Availability	12346	https://survey123.arcgi
XYZ Internet Provider	123123	Availability	123465	https://survey123.arcgi
XYZ Internet Provider	123123	Availability	123464	https://survey123.arcgi

At the conclusion of the rebuttal period on June 14, 2024, and before final determinations are made, the SCBBO will post a list a of all submitted challenges and rebuttals before final determination is made.

Technology Codes

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	• 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 • This includes service provided over a 4G LTE or 5G- NR mobile network but sold as a fixed solution • 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

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[7] https://help.bdc.fcc.gov/hc/en-us/articles/5290793888795-Fixed-Technology-Codes-

72	Licensed-by-Rule Terrestrial Fixed Wireless	Fixed terrestrial wireless services using entirely licensed-by-rule spectrum or a hybrid of licensed-by-rule and unlicensed spectrum to make last- mile connections to fixed locations • 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
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.

Challenge Type Codes

Table 4: 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.