Massachusetts Broadband Navigator™ User Guide

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Change Log

- Updated on June 20, 2024
  - Page 20: Bulk Challenges Section was updated to reflect that zip files will *not* be an accepted file type.

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Broadband Navigator™ User Guide

Welcome to the Broadband Navigator™ User Guide. This guide is designed to help you understand and use the application for managing the Broadband, Equity, Access, and Deployment (BEAD) State Challenge process. All eligible challengers (Non-Profits, Local Governments, Tribal Governments, and Internet Service Providers (ISPs)) should reference this guide for portal operations. Additional technical assistance and how-to guides will be available on the BEAD Challenge Landing Page and/or be provided by the Massachusetts Broadband Institute (MBI).

Overview

According to the National Telecommunications and Information Administration's (NTIA) BEAD Program Guidance, each State Broadband Office needs to implement a State Challenge Process Portal as part of their BEAD Program. The goal of the Challenge Process is to improve the broadband data coverage (BDC) map in Massachusetts, so that the MBI has the most accurate map possible to use to make funding disbursement decisions. The Broadband Navigator will provide the tools and capabilities to allow Local Governments, Tribal Governments, ISPs, and Nonprofits to view and challenge the broadband coverage determinations (served, underserved, unserved)[1] for each broadband serviceable location (BSL). Members of the public will be able to use the tools to submit evidence that could substantiate challenges.

Challenges are used to challenge the provided service information on locations and must be accompanied by evidence. Evidence consists of documentation supporting the challenge being made. Each challenge type requires a different set of evidence and may have multiple pieces of evidence to support said challenge.

To manage these challenges according to the NTIA's BEAD process policy guidelines, AppGeo provides the Broadband Navigator™ Portal. The Portal is a solution that will meet NTIA's requirements while also allowing MBI the flexibility to implement the tool in a way that aligns with their particular priorities and goals, according to their Five-Year Plans and Initial Proposals.

Using the Navigator, MBI can manage the complete lifecycle of a BEAD challenge through inception, review of evidence, rebuttal, adjudication, and final determination.

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[1] Unserved Location – is a Broadband Serviceable Location without access to reliable broadband internet speeds of at least 25 Mbps download and 3 Mbps upload with a latency of less than or equal to 100 milliseconds.
Underserved Location – is a Broadband Serviceable Location without access to reliable broadband internet speeds of at least 100 Mbps download and 20 Mbps upload with a latency of less than or equal to 100 milliseconds.
Served Location – is a Broadband Serviceable Location with access to broadband internet speeds greater than or equal to 100 Mbps download and 20 Mbps upload.

Who Can Submit Evidence?

Anyone using the Broadband Navigator is welcome to submit evidence on issues with Availability, Speed, Latency, Technology, Data Cap and Business Service Only. If you are a member of the public who would like to submit evidence, see the Resident Submission section below (pg. 13-15).

To understand more about accepted evidence for the different challenge types please see MBI's Evidence Guidance document on the BEAD landing page.

Who Can Create Challenges?

Only the following entities are eligible to submit challenges to the State under the BEAD Program federal policy:

1. Units of Local Government
2. Tribal Governments
3. Nonprofit Organizations
4. Internet Service Providers (ISPs)

Types of Challenges

Challenge	Description
Availability – Service Available	**ISPs** are stating that the location or locations on the map have had subscribers in the last 12 months or **service is available as a standard installation based on existing infrastructure**
Availability – Service Not Available	**Individuals, Nonprofits, Local Governments, and ISPs** are stating that the service displayed on the map is not offered.
Speed/ Latency	**Individuals** are taking speed tests to show that their subscribed service tier is not served at the speed indicated on the map. Additionally, they are testing to ensure the latency of this BSL exceeds 100mbps.
Data Cap	**Individuals, Nonprofits, Local Governments, and ISPs** are stating that there is a data cap of 600GB or less imposed on this BSL's service tier.
Technology	**Individuals, Nonprofits, Local Governments, and ISPs** are stating that the technology indicated for this service tier is incorrect.
Business Service Only	**Individuals, Nonprofits, Local Governments, and ISPs** are stating that a particular service level at a residential location is only available to businesses.
Enforceable Commitment	**Nonprofits, Local Governments, and ISPs** are stating that there is an enforceable funding commitment to deploy broadband at this location by the date stated in the deployment obligation.
Not Part of an Enforceable Commitment	**ISPs, Broadband Offices, Nonprofits, and Local Governments** state that the location is in an area subject to an enforceable commitment, but it is not part of that commitment.
Planned Service	**ISPs, Nonprofits, and Local Governments** are stating that there are plans for service at this BSL.

Location is a Community Anchor Institution (CAI[2])	**Individuals, ISPs, Nonprofits, and Local Governments** are stating that the location falls within the definition of a CAI as defined by the State Broadband Office.
Location is not a CAI	**Individuals, ISPs, Nonprofits, and Local Governments** are stating that the location does not fall within the definition of a CAI as defined by the State Broadband Office.
CAI: Qualifying broadband not available	The CAI cannot obtain qualifying broadband. Qualifying Broadband" to a CAI is Reliable Broadband Service with (i) a speed of not less than 1 Gbps for downloads and uploads and (ii) latency less than or equal to 100 milliseconds.
CAI: Qualifying broadband available	The CAI can obtain qualifying broadband. Qualifying Broadband" to a CAI is Reliable Broadband Service with (i) a speed of not less than 1 Gbps for downloads and uploads and (ii) latency less than or equal to 100 milliseconds.

MBI will administer area and MDU challenges for the following challenge types: Availability, Speed, Latency, Data cap, and Technology.

Bulk challenges will be permissible for the following challenge types: Availability, Enforceable Commitment, and Planned Service.

Residents cannot directly submit challenges, but they can collect evidence and work with an Eligible Challenger to complete a challenge on their behalf for the following challenge types: Availability, Speed, Latency, Technology, Business Service Only, or Data Cap.

Challenge Process Phases Overview and Timeline

Publication of Eligible Locations – June 10, 2024

Prior to the Challenge Phase kickoff, MBI will publish the final set of locations eligible for BEAD funding. Eligible locations will consist of 'unserved' and 'underserved' locations outside of existing federal or state funded areas. This data is sourced from the FCC's National Broadband Map and NTIA's National Broadband Availability Map (NBAM). Additionally, MBI will publish locations that are served, including funded areas, as they may also be challenged.

Challengers are encouraged to use this time to register on the portal, review the classification of BSLs, identify the ones they plan to challenge, and gather the necessary evidence to submit a challenge. MBI will be hosting Office Hours throughout the Challenge Process to address questions

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[2] According to the Federal Communications Commission (FCC), community anchor institutions (CAIs) are, "schools, libraries, medical and healthcare providers, public safety entities, community colleges, and other institutions of higher education, and other community support organizations and agencies that provide outreach, access, equipment, and support services to facilitate greater use of broadband service by vulnerable populations, including low-income, the unemployed, and the aged."

that may arise. MBI will host a portal registration and map navigation specific Office Hours on June 11th. Please register here.

Challenge Phase – June 20, 2024 to July 20, 2024

During this phase, eligible entities may submit challenges through the challenge portal, which can be accessed here, and members of the public will be able to submit evidence that could substantiate challenges. Challenges must include evidentiary support of each challenge based on the evidence documentation provided in the state's BEAD Initial Proposal Volume I.

Once evidence is submitted, the challenge will appear in the challenger's dashboard and MBI's dashboard for review. Each challenge has its own activity log, which enables MBI to audit any challenge. From the dashboard, the MBI or their designees can examine the provided evidence and accept or reject it based on the guidelines of the BEAD Challenge Process. If MBI determines the evidence does not meet the required standards, the challenger can resubmit their evidence as long as it is submitted before the end of the Challenge Phase. If the challenge meets the requirements, it will be updated in the portal as 'Challenged' and be visible to the ISP whose service availability and performance is being contested.

The portal will also notify the ISP of the challenge through an automated email when the Rebuttal Phase begins. The email will contain important timing information on the specific challenge, alerting the rebutters of the deadlines associated with each challenge.

Deadlines are a critical element of the BEAD Process: It is recommended to submit challenges early. If any errors exist, there will be an opportunity to re-submit, but only within the Challenge Phase window. No changes will be accepted after the 30-day Challenge Phase window.
As a reminder, the Challenge Phase will close on July 20, 2024. MBI recommends submitting challenges prior to the end date in case evidence needs to be re-submitted.

Rebuttal Phase – July 26, 2024 to August 25, 2024

At the end of the Challenge Phase, an official Rebuttal Phase will begin. Each challenge accepted by MBI will have 30 calendar days to be rebutted from the launch of the Rebuttal phase.

Service Level Challenge Rebuttals

Challenges related to service level (availability, speed/latency, data cap, technology, and business service only) will be posted in the dashboard of the associated ISP. Challenges of these challenge types may only be rebutted by the challenged service provider. The challenged service provider may rebut the reclassification of a location or area with sufficient evidence outlined in the state's BEAD Initial Proposal Volume I. If rebutted, the challenge location or locations will be put into the 'disputed' state. If a challenge is not rebutted within the rebuttal period, the challenge will be accepted and enter the 'sustained' state.

All Other Challenges - Open Rebuttals

All other challenge types (planned service, enforceable commitment, location is a CAI, and location is not a CAI) may be rebutted by any registered users. Since Non-profits and Local or Tribal governments are not linked to specific locations, they will not receive email notifications. These challenges will be placed in the 'Open Rebuttals' section in the Navigator and remain open for the rebuttal period.

All rebuttals will be reviewed by MBI to determine if the rebuttal evidence is sufficient. If rebuttal evidence is sufficient, the challenge is rejected. If the rebuttal evidence is not sufficient, the challenge is sustained.

Adjudication Phase – August 26, 2024 to October 18, 2024

At the end of the Rebuttal Phase, an official Final Determination / Adjudication Phase will begin. Challenge evidence must be fully reviewed by MBI, and the challenge must be classified as 'sustained' or 'rejected.' This phase serves as a buffer and ensures all rebuttals submitted at the end of the Rebuttal Phase have ample time to be accepted or rejected.

Navigator Walkthrough

Public-Facing Mapping Functionality

The following items encompass the core functionality of the public-facing component of the Broadband Navigator™.
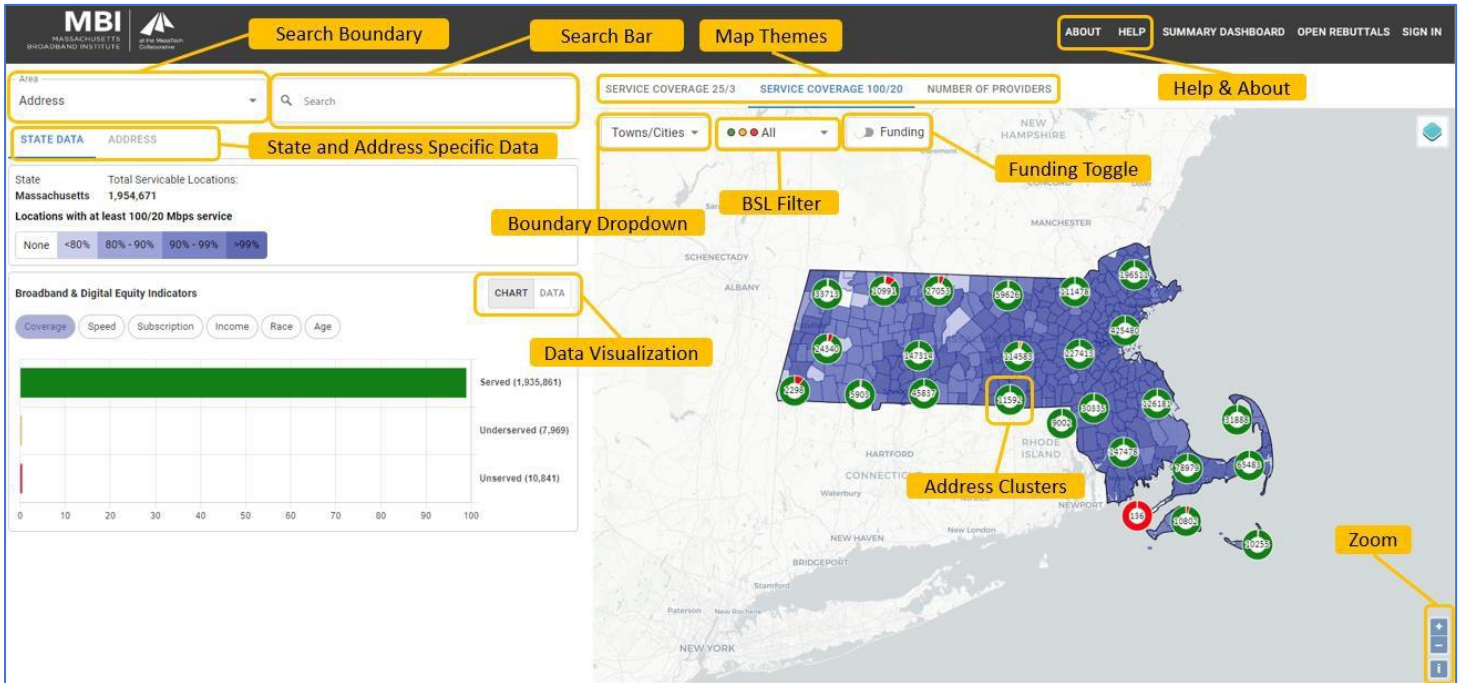

Image 1: Overview of the Broadband Map with labelled features. This image can be used as a reference alongside other images in the document.

Introductory Screen / About / Help content: When the user first enters the website, a pop-up screen is displayed that contains important information that MBI wants to communicate to users. The About and Help content is available to guide users through the application and workflow.
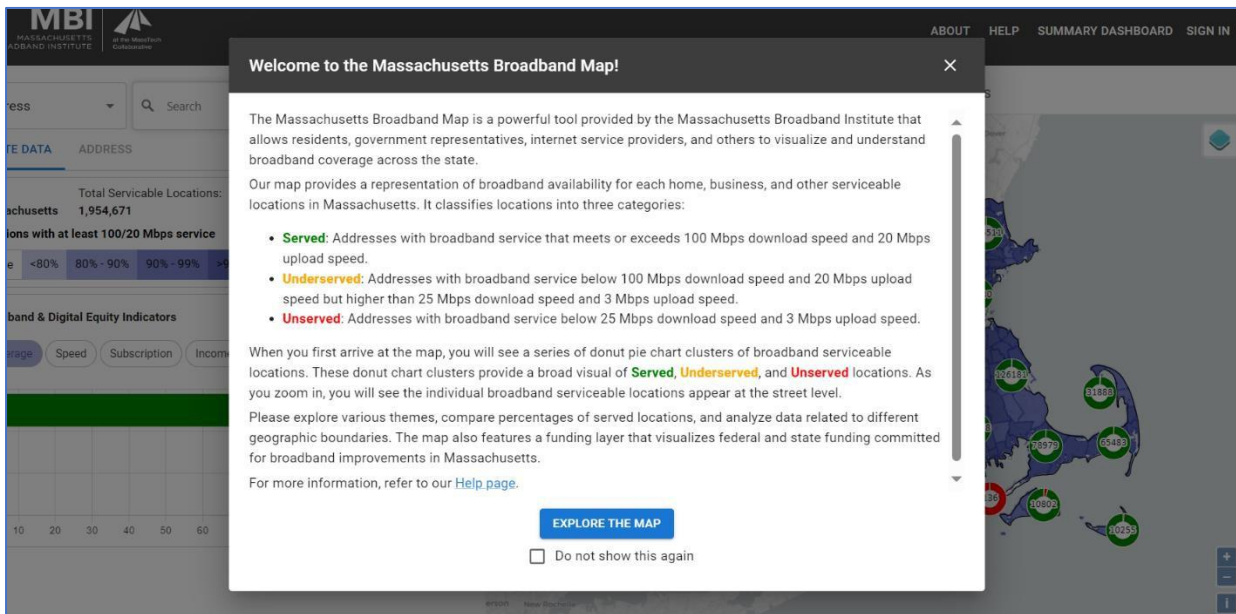

Image 2: Welcome screen when first entering the Broadband Navigator portal.

View Broadband Data Coverage / Availability Map: At first glance, users will be presented with the Broadband Availability Map showing 'donut' charts that display the total number of BSLs in the area and their proportion of Unserved, Underserved, and Served status. These charts are derived from aggregates of census block groups.
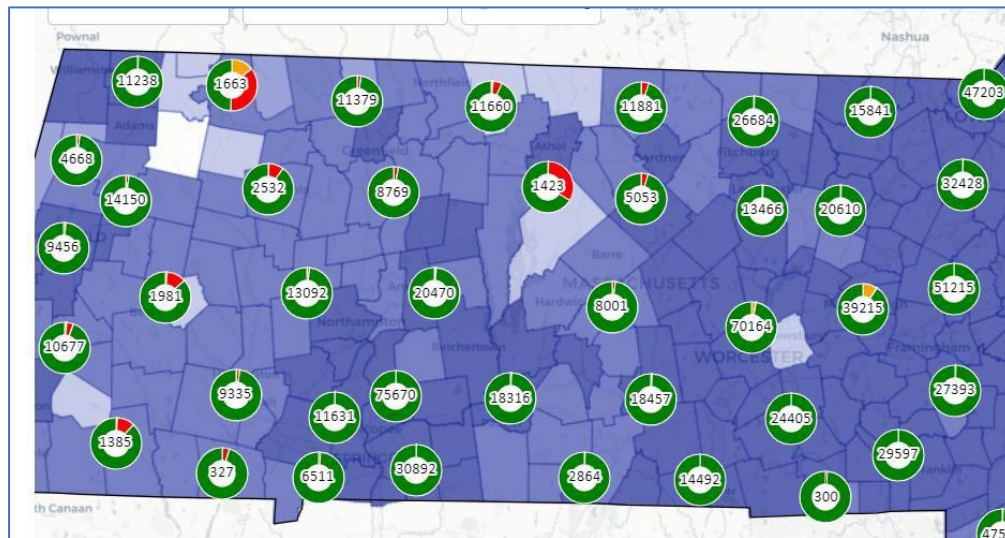

Image 3: Donut charts displayed on the broadband map. Green is served, yellow is underserved, and red is unserved.

Choose from various Map Themes: Users can choose from a pre-set list of map themes that will change the way the broadband availability is displayed on the map. The three themes are Service Coverage 25Mbps/3Mbps, Service Coverage 100Mbps/20Mbps, and Number of Providers. Included is a legend to the left of the screen, explaining the boundaries of each shade of the choropleth visualization.

Image 4: Map themes the users may select.

View Existing Broadband Funding Overlay: An overlay of Broadband Funding can be turned on or off using the Funding Toggle, displaying areas within the State that have received funding.
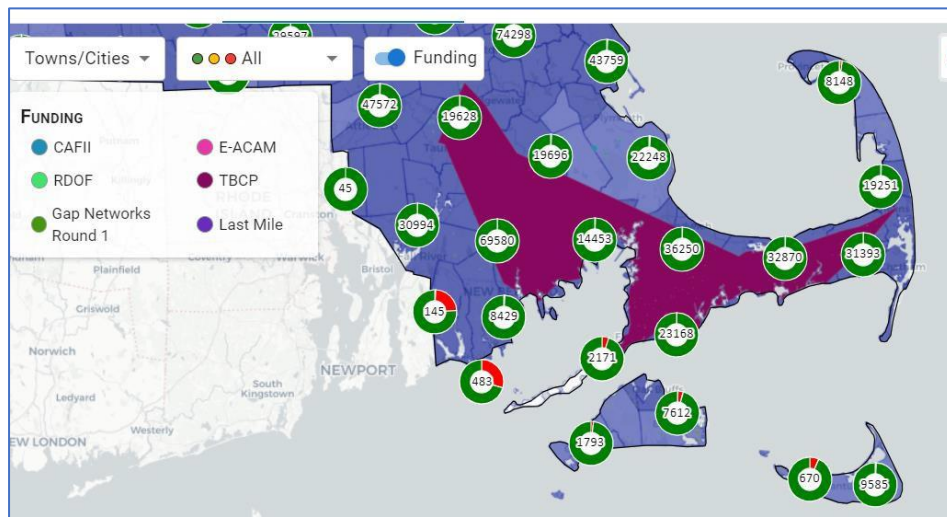

Image 5: The funding toggle has been turned on and will display areas that have received funding.

Select Levels of Geography: By selecting the boundary dropdown, users can choose to view area boundaries and data by various geographic areas, such as Towns/Cities, Census Block Group, or Congressional District.
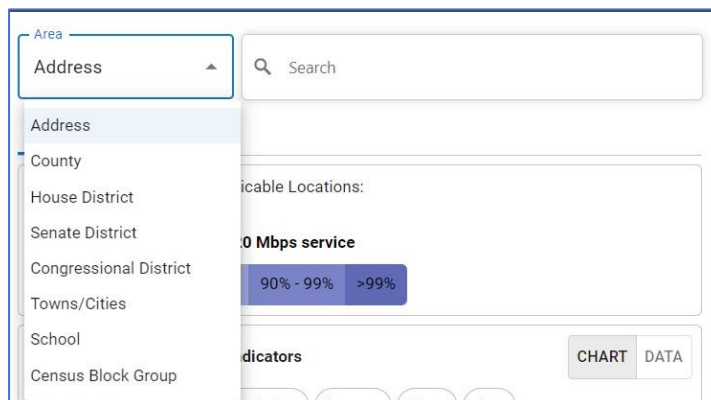

Image 6: Drop-down menu to change the geographic areas you are viewing on the map.

Toggle Served / Underserved / Unserved: Users can view or hide all Served, Underserved, and Unserved BSLs as a count when zoomed out, or specific points when zoomed in using the BSL Filter.
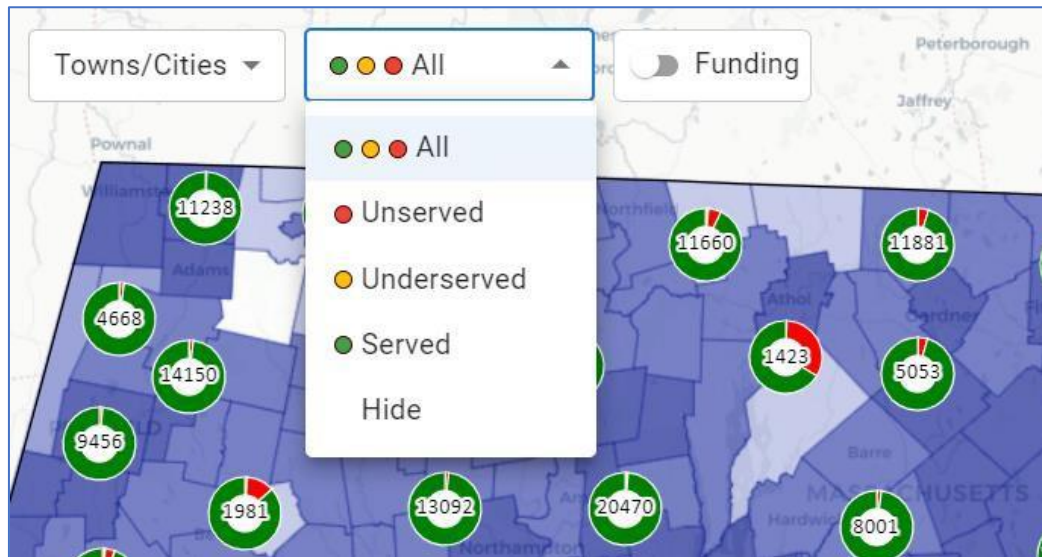

Image 7: Drop-down window to change type of BSL being displayed.

View Broadband & Digital Equity Indicators: Users can gain more insight into broadband availability and demographics based on the geographical boundary selected. Included indicators are Broadband Coverage, Speed, Subscription, Income, Race, and Age. This information can be visually represented in the Chart Tab or numerically viewed by selecting the Data Tab. Use the Data Visualization tabs to navigate between the two.
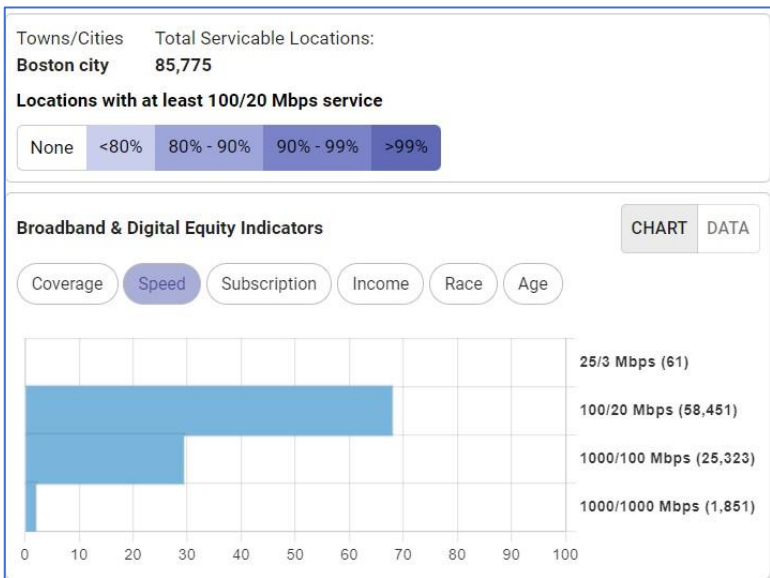

*Image 8: Broadband indicator **chart** displaying speed coverage for the City of Boston.*
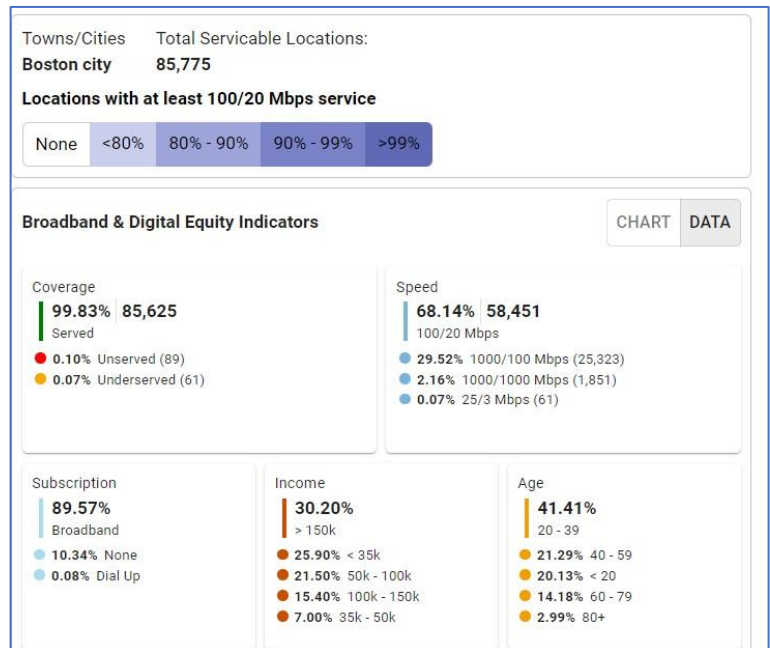

*Image 9: Broadband indicator **data** for the City of Boston*

Search for a Geographical Area and view broadband details in that Area: Using the Search Boundary dropdown, users are able to search within different geographic boundaries. To search Census Block, Block Group, or Tract, search by the 15, 12, or 11 digit census code. To search by House, Senate, or Congressional District, search by specific number only for the district (e.g. 1, 5). These codes can be found [here](#).

If you do not know the district number, you can use the Boundaries dropdown to explore the different House, Senate, or Congressional Districts in the State.
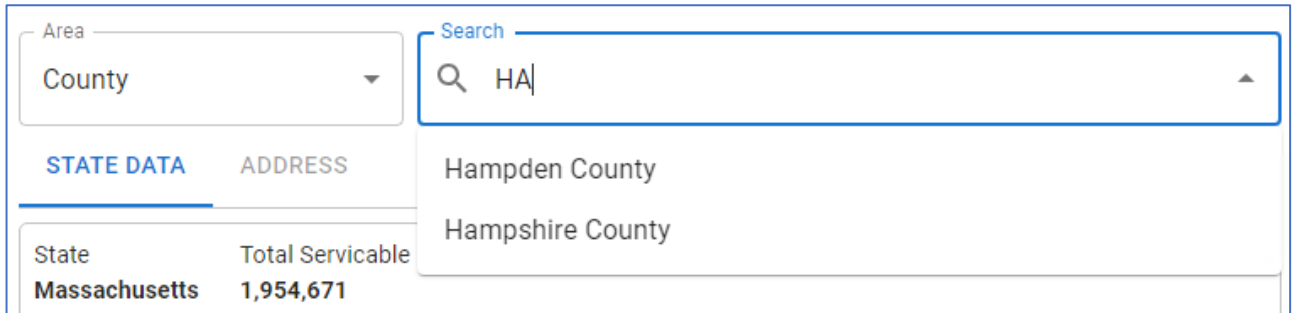

Image 10: Search different areas with the Area Dropdown.

Search for an Address and view broadband details at that Address: Using the address search bar or zooming in and clicking a specific address on the map allows users to see details about the broadband service and funding at that location.

The Broadband Navigator uses a combination of the MapBox geocoder and the FCC Fabric data to search for addresses. When the user enters an address into the search bar the MapBox geocoder will list options for selection. When you click on the address the Navigator will take you to the closest BSL to that location. In most cases this works perfectly, but there are cases where MapBox cannot match the addresses in the fabric data. In those cases, the user is not taken directly to the BSL and shown a screen that there is no BSL corresponding with the address entered. In other cases, the user will go to a BSL that does not directly correspond with their searched address. In edge cases if the user is unable to find an address we recommend navigating to the approximate

location and selecting the BSL. All BSLs in the fabric are present in the map and can be found, but there are edge cases where the name matching is imperfect.
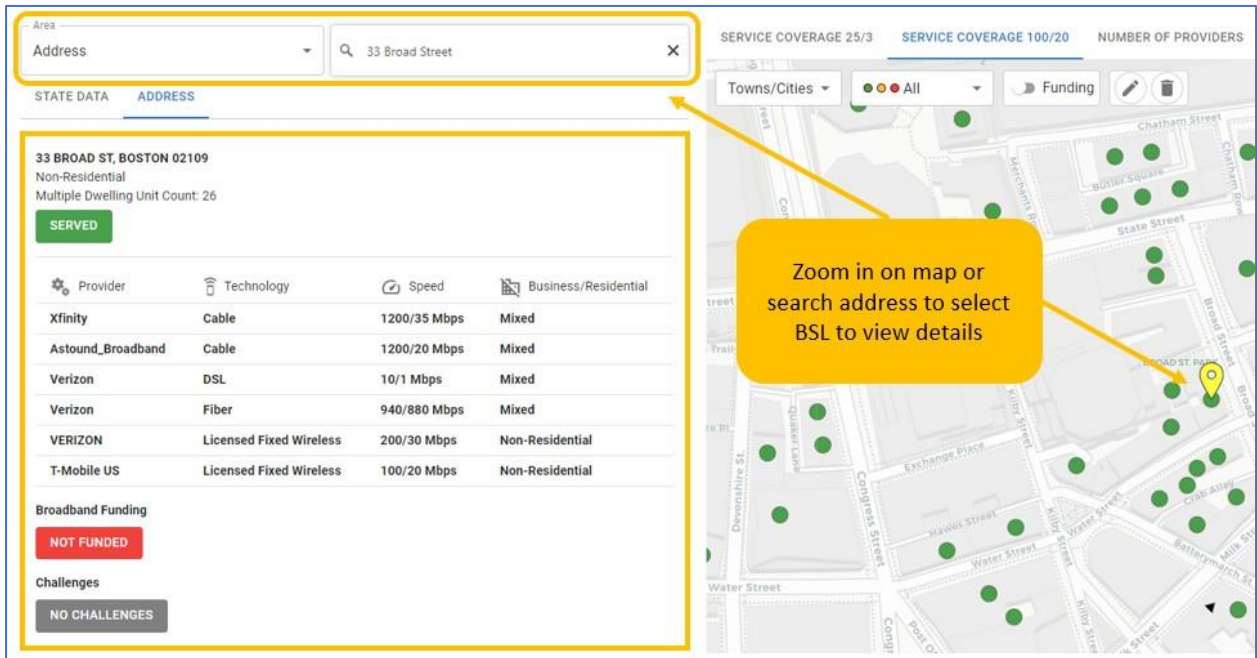

Image 11: Address search and selection view showing broadband service and funding at the location.

Share or Bookmark Map URL allowing selected locations/views to be sent out: The URL for the map can be copied, shared or saved. When clicked or re-opened again by another user (or by the same user as a bookmark) the map will open at the same location and display as was previously set.

Select a Basemap (Street Map or Imagery): Users will have the option to view a basic street map or aerial imagery as the underlying basemap.

Resident Submission

Residents will not be able to submit challenges on their own. They will be able to collect evidence that will then be submitted to MBI's partner Connected Nation or a registered Eligible Challenger. Eligible Challengers will submit challenges on the residents' behalf. MBI will publish a list of Eligible Challengers who can assist residents in evidence submission. To connect with Connected Nation, please email mabeadsupport@connectednation.org

Residents can select a BSL and take a speed test or submit evidence for a challenge without the need to register for an account. After selecting a BSL they can choose 'Take a Speed Test' or 'Report a Service Issue' from the Challenge Hub section.

Taking Speed/Latency Tests:

When taking a speed test, users will be prompted to enter their contact information and select their service tier. Additionally, the user will click through several questions pertaining to the quality of their home network (mobile/wireless/wired network, current network bandwidth, and more). If the

tested speed is considered insufficient, users will be guided to a screen to submit evidence. This evidence may be used to file a Speed/Latency, Technology, or Availability Challenge. The Challenge Navigator will automatically e-mail the user with a link to take another speed test until *three speed tests* have been taken to comply with BEAD guidance.   Three speed tests must be taken at least 24 hours apart to qualify as sufficient evidence.

Residents who take speed tests in the Broadband Navigator will not have to reach out to an Eligible Challenger. If all three speed tests are valid, they will automatically be sent to Connected Nation for review. It is vital that residents begin taking speed tests at least three days before the end of the Challenge Process for the consecutive speed tests to be considered.
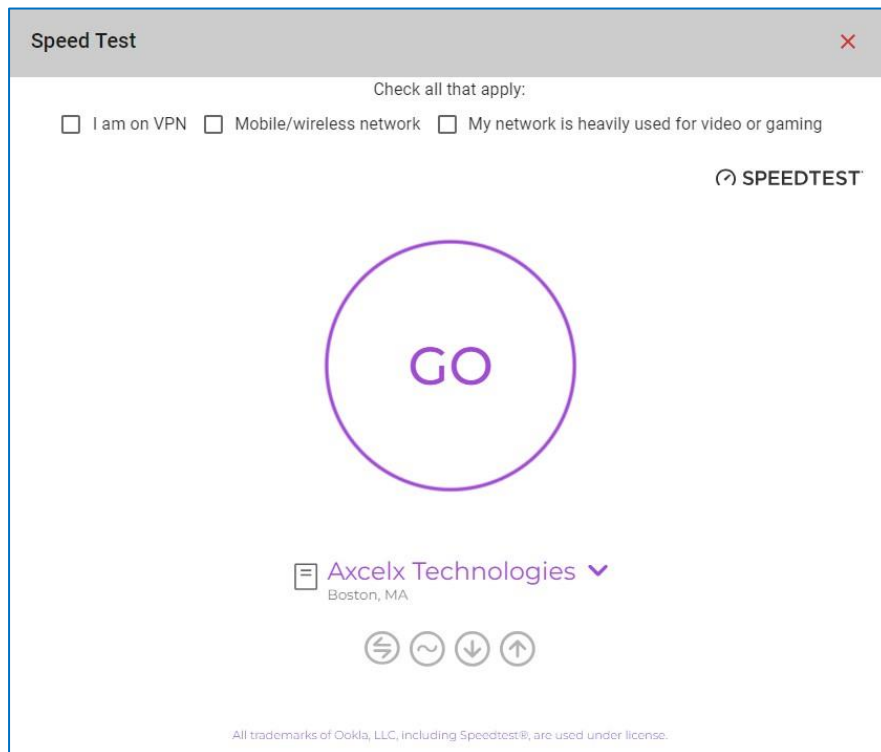

Image 12: Take a Speed Test

Submitting Problems with Service

Residents may submit evidence documenting issues with Availability, Data Cap, and Business Service Only. Users must enter their contact details, provider type, property type and reason for the service issue. Once users certify this information, they will be prompted to upload evidence. The required evidence will be listed based on the identified reason for the service issue. Acceptable evidence types include PDF(s), JPEG(s), BMP(s), or Word Document(s). Please be sure to correctly label evidence files. Evidence will be reviewed by an Eligible Challenger before submitting as a challenge for MBI for review.
Please note: All personal information entered will remain confidential.

Image 13: Residents must submit evidence that meets the requirements and is in the allowable file type.

Account Registration- For Eligible Entities Only

Request a New Account:

Eligible challengers can request an account by selecting the 'Sign In' link in the upper right corner of the application and then selecting 'Request a new account.' Multiple people from one organization may register for an account but should ensure the same organization name is used consistently across users (i.e., if one user registers using Xfinity all users should use Xfinity and not Comcast or any other variation).

Image 14: Sign in button

Image 15: Log in screen

1. Select the 'Sign In' link in the upper right corner of the application.
2. Select 'Request a new account'
3. Fill out user information
    I. *Full name
    II. *Email address
    III. *Phone Number
    IV. *Organization Category
        i. Unit of Local/ Tribal Government
        ii. Non-Profit Organization
        iii. Broadband / Internet Service Provider
    V. *Organization
        i. Nonprofits and Local Governments:
            1. Select the Organization dropdown.
            2. Scroll through the Organizations to search for your organization.
            3. If you do NOT see your organization in the list, select 'Other' and manually enter the name of your organization.
            4. If the account request is accepted, the manually entered organization will now be listed in the Organization drop down for all future users to choose from.
            *Please ensure that the **same organization name is used** if multiple users are accessing the portal. This will ensure access to challenge review dashboards.*
        ii. Broadband / Internet Service Providers:
            1. Select the Organization dropdown.
            2. Scroll through the Organizations to search for your organization. All FCC filed broadband providers in your state will be listed alphabetically.
            3. If you do NOT see your organization in the list, select 'Other' and manually enter the name of your organization.

      4. <u>If the account request is accepted, the manually entered organization will now be listed in the Organization drop down for all future users to choose from.</u>

     *Please find and select your organization name from the auto populated list. **This is critical to ensure challenges will be linked to your account and will be appropriately notified.** *

    VI.   *****Webpage (your organization's URL)

4. Select 'Request'
5. Request will be reviewed.
6. Once accepted, you should receive an email confirmation providing a link to complete the signup process and create a password. This link will only be valid for seven days, at which time it will expire, and a new request will need to be submitted.
7. Once the password has been set, the new user can view and use all functionality associated with their organization type.

Submitting Challenges

Prioritization of BEAD-relevant challenges

*The focus of the state challenge process is on making funding decisions, and on that basis the Broadband Office will deprioritize challenges that would have no effect on whether the location would be eligible for BEAD funding. Check to see if the challenge would have **no effect** and be **deprioritized** by reviewing whether any of the following situations apply:*

-If filing a service level challenge to a location already considered eligible for BEAD funding (i.e. service status is already unserved or underserved and no award of public funding)

-If challenging a location that would require multiple other challenges (that have not yet been recieved) to have an effect (i.e. location has multiple providers reporting Reliable Broadband Service above 100/20 Mbps, location has one or more providers reporting Reliable Broadband Service above 100/20 Mbps and an award of public funding)

If a challenge is deprioritized, the Broadband Office may still draw on this information after the state challenge process for the purpose of improving general accuracy of broadband mapping.
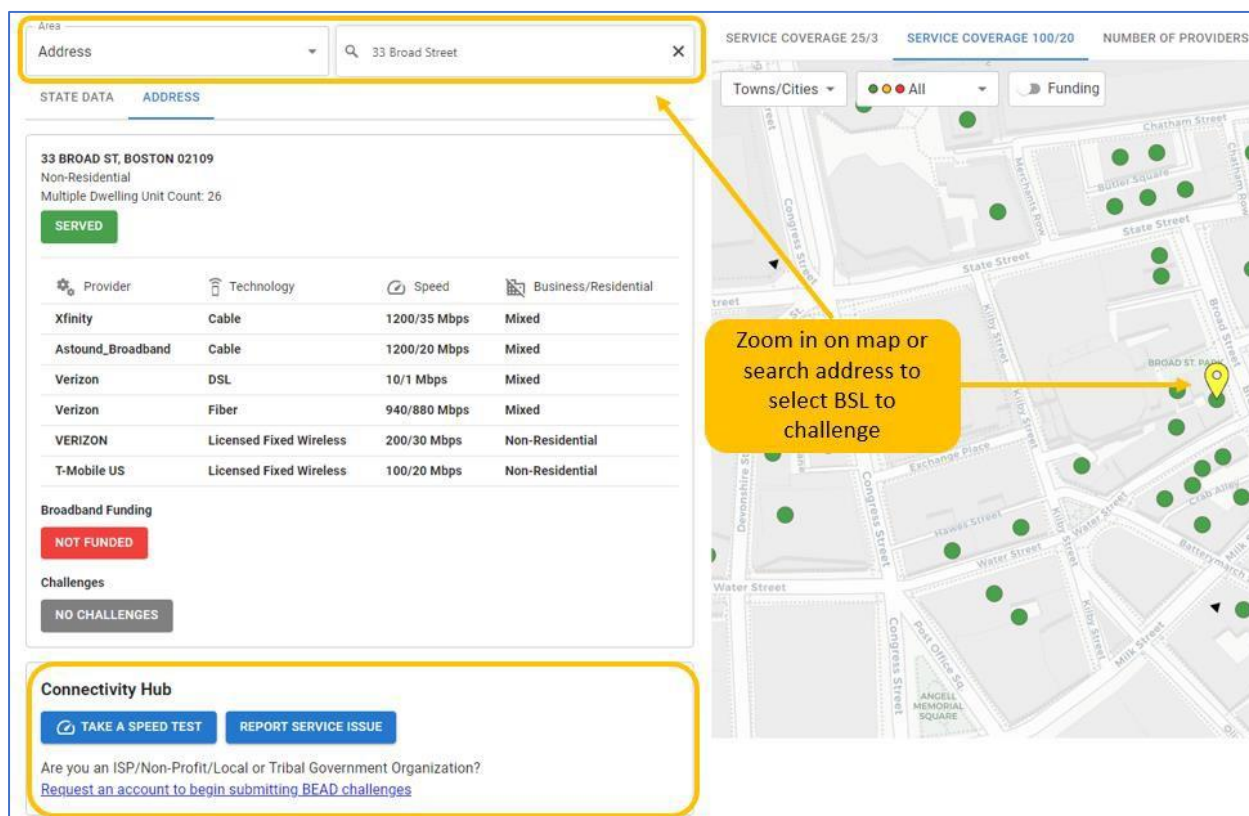
Image 16: Searching for an address and submitting a speed test

By BSL

1. Search for the desired BSL by navigating the map or using the 'Search' function in the top left of the application.
2. Once you have found your desired BSL, ensure that it is selected and that the correct address is visible in the 'Address' tab to the left of the map.
3. The following information for the selected address will be shown:
    i. Service status
    ii. Funding status and funding information (if applicable)
    iii. Available Provider, Technology, and Speed Information
4. To submit a challenge, select 'Submit a Challenge' in the 'Connectivity Hub' pane to the left of the map.
5. A pop-up window will appear on screen with the option to select your 'Service Issue'. Select from the following list based on the service issue existing at the selected address:
    i. Availability – Service Not Available
    ii. Availability – Service Available
    iii. Data Cap
    iv. Business Service Only
    v. Speed
    vi. Latency
    vii. Technology
    viii. Enforceable Commitment
    ix. Not Part of an Enforceable Commitment

x.   Planned Service

   xi.   Location is a Community Anchor Institution

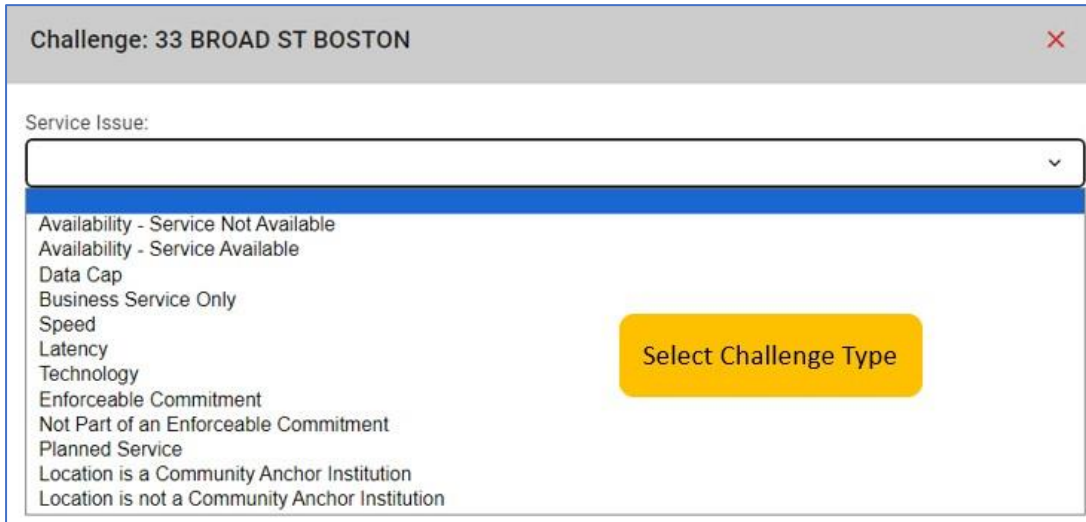   *xii.*   Location is not a Community Anchor Institution

Image 17: Service challenge type dropdown. Please note: the options for 'Service Issue' may change depending on your account type (ISP, Non-Profit, Tribal Government, or Local Government).

6.   Next, depending on your challenge type, you will be required to answer questions to support your challenge.

   i.   Select the accurate 'Provider – Technology – Speed', 'Reason', 'Property Type', 'Plan Speeds', etc. from the drop downs.

   ii.   Review the '*Certification of Challenger (Entity)* and '*Privacy Act Statement*'. If all information is accurate and lawful, select the 'Submit' button on the bottom right to complete your challenge.

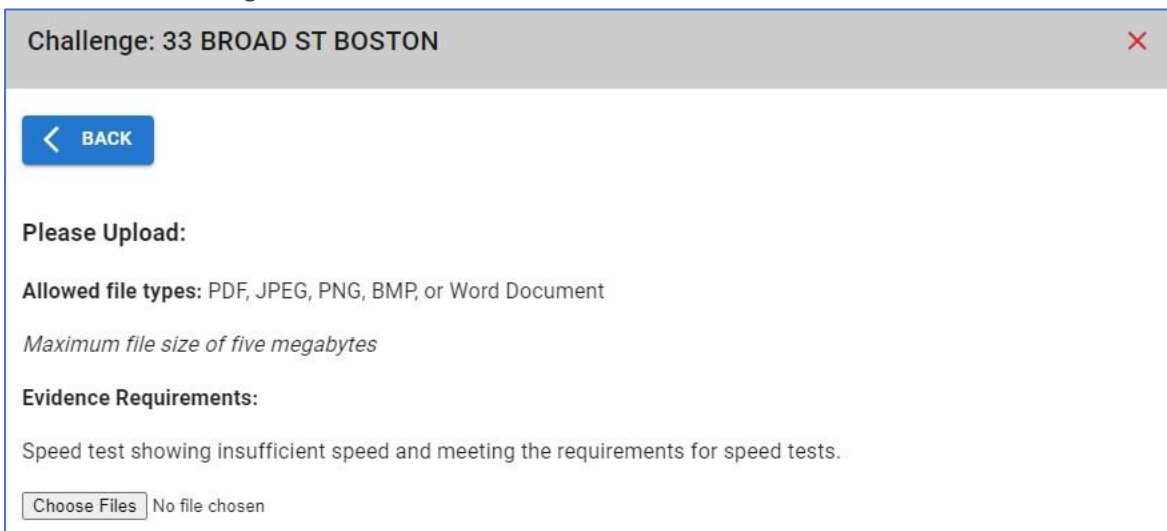7.   Next, you will be prompted to submit the appropriate evidence depending on the challenge.

Image 18: Challenge evidence upload

> i. Required evidence for your challenge type will be listed on the 'Evidence Requirements' section (Every challenge will have specific evidence requirements).
>
> ii. Select 'Choose Files' to add the required evidence.
>> ii. All evidence must be in PDF, JPEG, PNG, BMP, or Word Document format.
>> ii. You may upload any number of files under 5MB each.
>> ii. If the incorrect evidence is attached by mistake, use the red 'X' to remove the attachment.
>
> iii. Select 'Submit' at the bottom right of the screen once the evidence has been successfully attached (denoted with a green check mark). *Note: If the evidence does not meet the requirements for the specified challenge type, the challenge will be rejected.*

8. The challenge will automatically be forwarded to your Broadband Office for review.

Bulk Challenges

> *Bulk Challenges can be filed for the following challenge types: Enforceable Commitment, Not Part of an Enforeable Commitment, and Planned Service. The remaining challenge types require location-specific evidence (e.g. speed test, refusal of service to address) and must be filed by BSL. Challengers can use area challenge rules (e.g. submitting challenges to 6 locations in a census block group) as a mechanism to challenge more comprehensive areas of the map.*

1. Zoom into the desired map location until BSL points appear.
2. Once you have found the desired area, select the pencil icon to draw a boundary around all desired BSLs with the same challenge provider and type. Remember to close the boundary by connecting the final point to the starting point. If an undesired BSL was included, you can restart the drawing process by selecting the trashcan icon.
3. Once the boundary is closed, a 'Service Challenge' window will appear to select the Service Issue from a list of Enforceable Commitment, Not Part of an Enforceable Commitment, and Planned Service.
4. Upon selecting your Service Issue, you will be directed to a page to fill in information on the challenge.
5. Review the 'Certification of Individual or Certifying Official' and 'Privacy Act Statement'. If all information is correct and lawful, select 'Next'.
6. On the next page, you will be asked to submit evidence. The dynamic text displayed on the page will inform you of the type of evidence you will need to submit for the selected challenge type. You will need to submit evidence for each BSL included in the bulk challenge. Select 'Choose Files' to upload evidence. Once complete, click 'Next'.
   i. Evidence must be in PDF, JPEG, PNG, BMP, or Word Document format.
   ii. You may upload up to 5 pieces of evidence. All 5 documents must be under 5mb.
   iii. A green checkmark will appear once the evidence has been successfully attached.

7. Once you are satisfied with the evidence selected, select 'Submit' to complete the challenge.
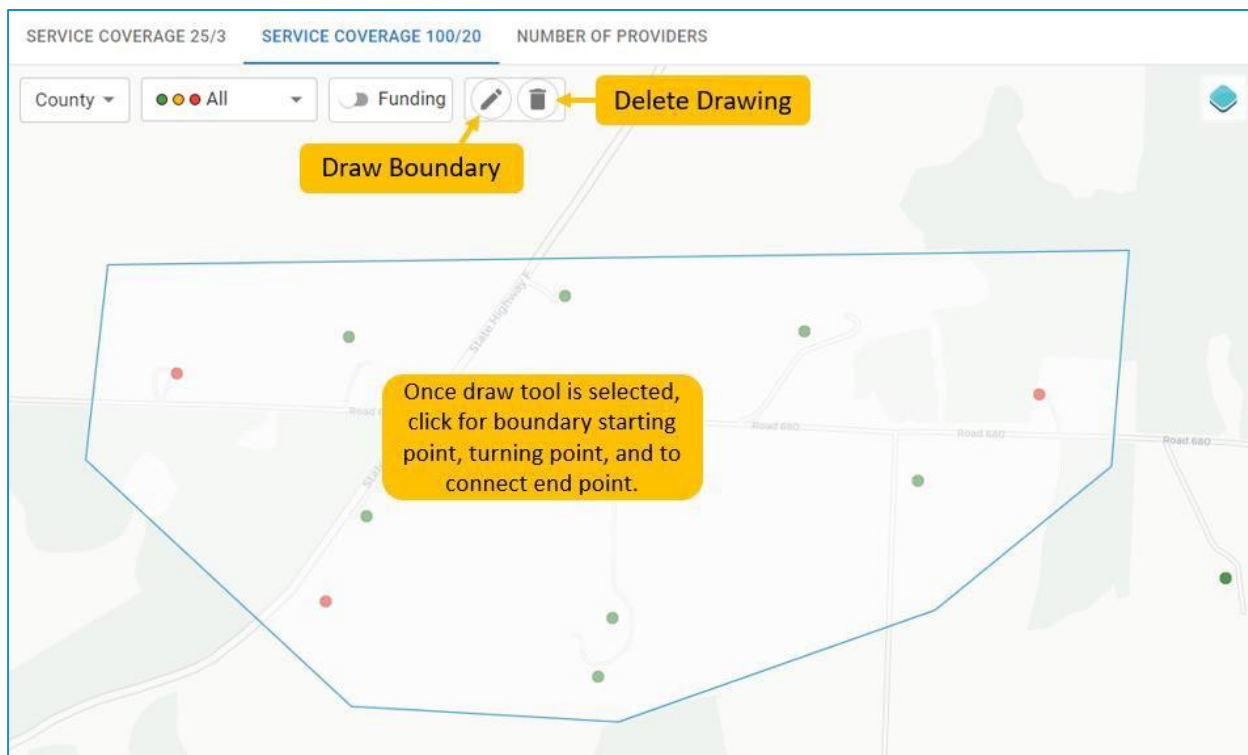

Image 19: Bulk area challenge

Review Challenges

Non-Profits, Local Governments, and Tribal Governments

The 'My Challenges' queue allows local governments, Tribal governments, and non-profits to view the challenges that they have submitted. They can see the status of these challenges as they move through the stages of evidence review, rebuttal, and adjudication. Challenges move to the 'Completed' queue once they have been fully reviewed. For example, a challenge may move into the 'Completed' queue if upon initial review of evidence, MBI deems the evidence insufficient. Challenges may also move into the 'Completed' queue following an ISP's failure to rebut or decision to sustain a challenge. Rebutted challenges that have been adjudicated by MBI will also fall into the 'Completed' queue. The 'Completed' queue does not indicate any confirmation or change in the BSL status of the location (Served, Underserved, Unserved), only that the challenge itself has been completed.

ISP

Challenges submitted by the ISP will be visible in their 'Created Challenges' section. In addition, they are responsible for reviewing challenges submitted against them that require rebuttal in their 'Awaiting Rebuttal' section of their dashboard. The deadline to review column will display the

calculated rebuttal deadline. Upon this date, the challenge will be sustained automatically and enter the 'Completed' section.

Pass-Through – Connected Nation

The designated Pass-Through organization (Connected Nation) is responsible for reviewing submissions by public users in the 'Evidence Review' section of the dashboard. If accepted, this will generate a challenge in MBI's dashboard for review and move to the 'My Challenges' section in the Pass-Through dashboard. Evidence submission that has been rejected, along with submissions reviewed by MBI will enter the 'Completed' state.

Area and MDU Challenges

Once evidence for individual BSL challenges has been reviewed and accepted, the system will check whether MBI's threshold for multiple BSLs in an area has been met to qualify for an area challenge. If so, the area challenge takes the place of the individual challenges. There are more robust evidence requirements for rebuttal of an area challenge.

An area challenge is triggered if six (6) or more broadband serviceable locations using a particular technology and a single provider within a census block group are challenged.

An MDU challenge is similar to an area challenge in that it is also triggered if a threshold value is reached for a particular technology from a single provider. However, for MDU challenges, the area assessed is the units within a single MDU. Successful MDU challenges must include evidence 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 of 25 units and above. An MDU challenge counts towards an area challenge (i.e., six successful MDU challenges in a census block group may trigger an area challenge.)

Deadlines are a critical element of the BEAD State Challenge Process. Each challenge will be tagged to alert rebutters or challenge reviewers of the associated deadlines for review of that particular challenge. Challengers should monitor their emails for any notifications relating to the status of their submitted challenge.

Resubmitting a Challenge

If a challenge is denied due to lack of evidence, authorized challengers will have a chance to re-submit the challenge within the Challenge Phase. Challenges that do not meet the acceptable guidelines for evidence may be denied or a request for more evidence may be given. If more evidence is requested, the challenger will receive an email with the information of the challenge that needs to be updated and the reason for rejection. To re-challenge, the challenger must submit an entirely new challenge for the BSL with sufficient evidence. If a re-submission is not entered before the end of the 30-day challenge period, the challenge will be denied. All evidence must be submitted prior to 11:59pm on July 20, 2024.

Rebutting the Challenge

The rebuttal phase begins on July 26, 2024. Rebutting parties will be notified at the start of the rebuttal phase via email. These challenges will be accessible in the dashboard or 'Open Rebuttals' page for review and rebuttal by challengers. The directions to rebut are based on organization type:

ISPs: Availability - Service is Available/ Availability –Service is Not Available/ Data Cap/ Business Service Only/ Speed/ Latency/ Technology

1. Log into the Navigator using your registered username and password.
2. Access the challenge portal by selecting your user icon in the top right of the page and selecting 'Challenge Dashboard.'
3. The dashboard will be organized into four sections:
    I. Awaiting Rebuttal
    II. Rebutted Challenges
    III. Created Challenges
    IV. Completed

Image 20: Challenge Dashboard

4. All Availability, Data Cap, Business Service Only, Speed, Latency, and Technology challenges will be listed under the 'Awaiting Rebuttal' tab with all necessary information on the challenge:
    I. Challenger
    II. Assignee
    III. Bulk Challenge ID (if applicable)
    IV. Area Challenge ID (if applicable)
    V. Challenge ID
    VI. Challenge Type
    VII. Submitted Date
    VIII. Deadline to Review
    IX. Actions
5. Select the challenge from the list or use the search bar to find a specific challenge by Challenge ID, Address, or Challenger.
    I. If your organization is using the assignments feature, choose 'Assigned to Me' in the top right-hand corner to view challenges assigned to you.
    II. Clicking the 'Download Challenges as CSV' button in the top right-hand corner will generate a download of the challenges in the dashboard and their associated information, including: ID(s), challenge type and date, assignee, review deadline, and challenger information.
6. The selected challenge will appear in the pane on the right.
7. If there is no evidence to support a rebuttal, the ISP may choose to sustain.

I.   No further steps will need to be taken; the challenge will automatically be accepted after the 30-day rebuttal period.
8. If there is evidence to rebut the challenge, the ISP can choose to submit a rebuttal. To submit a rebuttal, select 'Rebut this Challenge'.
    I.   Challenges that have a Bulk Challenge ID may be bulk rebut/sustained. To bulk rebut/sustain, select one challenge with the Bulk Challenge ID and navigate to the ⋯ button in the side bar. Select 'Bulk Rebut' or 'Bulk Sustain' to address every challenge in the Bulk Challenge.
        i.   If the user wishes to partially sustain or reject a bulk challenge, they may do so by addressing the partials one by one and bulk sustaining/rejecting the remainder.
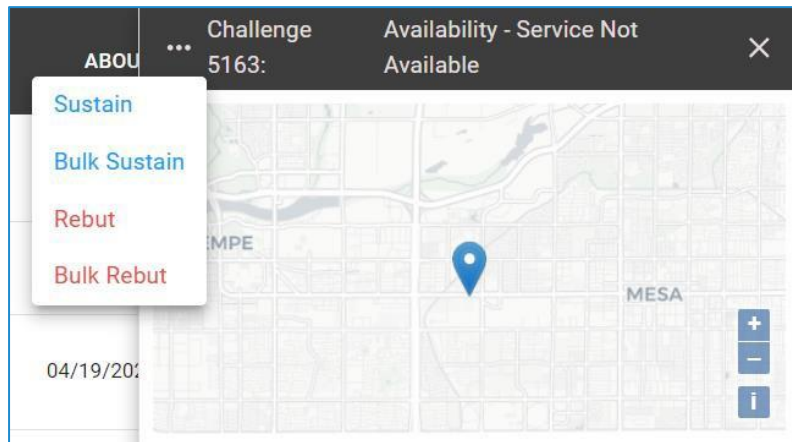

Image 21: Bulk Sustain and Bulk Reject

    II. Similarly, challenges with an 'Area Challenge ID' may be rebutted/sustained as a whole. To do this, select one challenge with the Area Challenge ID and navigate to the ⋯ button in the side bar. Select 'Area Challenge Rebut' or 'Area Challenge Sustain' to address every challenge in the Area Challenge.
        i.   If the user wishes to partially sustain or rebut an area challenge, they may do so by addressing the partials one by one and sustaining/rebutting the remainder.
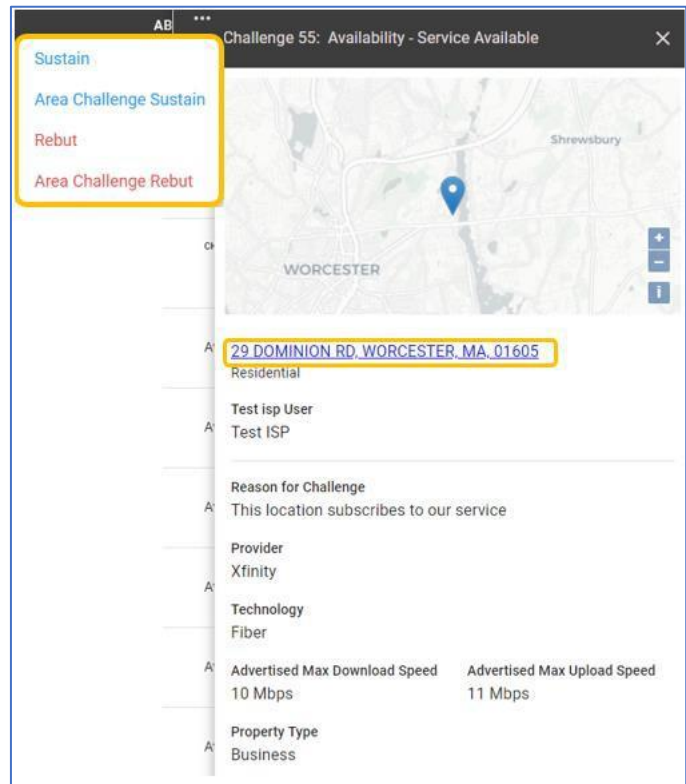   ii. Select the blue address hyperlink in the

Image 22: Area Challenge Sustain and Area Challenge Reject

challenge details panel to be taken to the challenge's location on the main map.

9. A pop up will appear with the steps to submit a rebuttal for this challenge.
10. Select the 'Reason for Rebuttal' in the provided list and select 'Next.'
11. Provide evidence to support your rebuttal:
    I. Required evidence for your challenge type will be listed on the 'Evidence Submission' page.
    II. Select 'Choose Files' to add the required evidence.
        i. All evidence must be in PDF, JPEG, BMP, or Word Document format.
        ii. You may upload as many files as needed; they must be under 5MB per file.
        iii. *If the incorrect evidence is attached by mistake, use the red 'X' to remove the attachment.*
        iv. Select 'Next' once the evidence has been successfully attached (denoted with a green check mark).
        Note: If the evidence does not meet the requirements for the specified rebuttal type, the rebuttal will be denied.
12. Select 'Submit' to submit your rebuttal.
    I. The challenge will be moved to the 'Rebutted Challenges' section.
    II. Your challenge status will now be listed as 'Rebutted'.

All Users: Open Rebuttals (Enforceable Commitment/ Not Part of an Enforceable Commitment/ Planned Service/ Location is a Community Anchor Institution/ Location is not a Community Anchor Institution)

Image 23: Open Rebuttals

1. Log into the Navigator using your registered username and password.
2. On the top right of the public facing map, you will see an 'Open Rebuttal' section.
3. Challenges that are ready for rebuttal will appear as a list giving any authorized user the ability to rebut throughout the State's rebuttal period.
    a. To search for a specific rebuttal, use the 'Search' bar or scroll through the list manually. Challenges may also be sorted by any field.
    b. Select your desired challenge to view the corresponding information.
4. Once the desired BSL or CAI has been selected, select the 'Rebut' button.
    a. If you are logged in, this will trigger a window to initiate a rebuttal.

      i. Broadband Office users can bulk reject/accept challenges that have a Bulk Challenge ID. To bulk reject/accept, select one challenge with the Bulk Challenge ID and navigate to the ⬛ button in the side bar. Select 'Bulk Reject or 'Bulk Accept' to address every challenge in the Bulk Challenge.

      ii. If the user wishes to partially accept or reject a bulk challenge, they may do so by addressing the partials one by one and bulk accepting/rejecting the remainder.
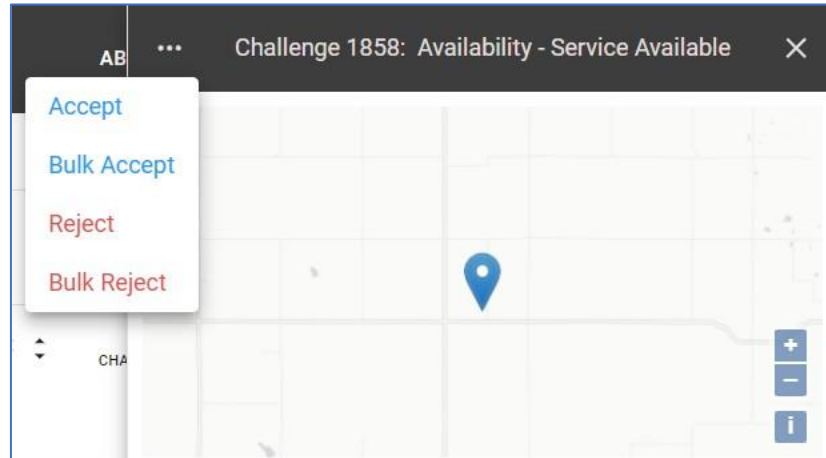

Image 23.1: Bulk Accept and Bulk Reject

    b. If you are still not logged in, this will ask you to log into your account to continue with the rebuttal process.

5. A pop up will appear with the steps to submit a rebuttal for this challenge.
6. Select the 'Reason for Rebuttal' in the provided list and select 'Next.'
7. Provide evidence to support your rebuttal:
    a. Required evidence for your challenge type will be listed on the 'Evidence Submission' page.
    b. Select 'Choose Files' to add the required evidence.
      i. All evidence must be in PDF, JPEG, PNG, BMP, or Word Document format.
      ii. You may upload any number of files under 5MB each.
      iii. If the incorrect evidence is attached by mistake, use the red 'X' to remove the attachment.
      iv. Select 'Next' once the evidence has been successfully attached (denoted with a green check mark).
      Note: If the evidence does not meet the requirements for the specified rebuttal type, the rebuttal will be denied.
8. Select 'Submit' to submit your rebuttal.
9. If a challenge does not receive any rebuttals, it will automatically be 'sustained' at the conclusion of the rebuttal period.

Review and Adjudication of Rebuttals

As rebuttals are entered, MBI will evaluate rebuttals. From the rebuttal dashboard, rebuttal evidence can be reviewed and sustained or rejected. Rebuttals status will be listed as 'Rebutted' until they are approved or denied. If approved the rebuttal will change status to 'Rebuttal Accepted.' If denied, the rebuttal status will be changed to 'Rebuttal Rejected.' All challenges will be moved to the 'Completed' section after rebuttal review, regardless of acceptance or rejection.

Tracking Challenge Status and Updating the Map

As evidence pertaining to a challenge is reviewed and accepted, the public-facing map will update to indicate that the BSL is in a challenged state. Once the challenge has been sustained or rejected, the BSL's status will be updated on the map to indicate the new service categorization (Served, Underserved, or Unserved). This capability allows all stakeholders to stay informed throughout the lifecycle of the challenge process. MBI will publish an initial list of the eligible locations on the MBI website at the end of the final determination phase followed by a final list once approved by NTIA.

Evidence and Documentation

When filing challenges, challengers must provide sufficient evidence to establish the challenge as valid. If your submission does not meet the minimum evidence criteria, the challenge will not be approved and will not move on to the rebuttal phase. Similarly, rebuttals also require adequate evidence to prove the challenge as invalid. Rebuttals without sufficient evidence will be automatically moved to the Final Determination phase. Having the correct evidence and documentation is the most important part of the challenge process. Sufficient evidence to meet challenge and rebuttal guidelines is established in the state's BEAD Initial Proposal Volume I. Follow the guidelines in Volume I document to ensure that the evidence minimum requirements are met before submitting challenges and rebuttals.

Please note: Challenges submitted with evidence that does not meet the 'Acceptable Evidence Types' will not be accepted. Please follow these guidelines to ensure that challenges and rebuttals are valid.

Privacy

All evidence and challenge submissions in the Broadband Navigator will remain private and will not be shared to other users. In addition, personal information is kept confidential and only available to the Broadband Office

Conclusion

Thank you for taking part in the Massachusetts BEAD Challenge Process. Your support is a critical part of the path towards Internet for all.

We hope this guide has enhanced your user experience. If you encounter any issues not covered in this guide, please reach out to MBI for assistance here: mapfeedback@masstech.org

Keep updated on the BEAD Challenge process by visiting the BEAD Challenge Landing Page for more information!