Instructions for Submitting BSL Eligibility Information

Overview

MBI is in the process of finalizing the Broadband Service Locations (BSL) for the Gap Networks Grant Program Round 1 awards. As a last step in preparing the final BSL list for each award, **MBI is allowing Internet Service Providers (ISP) with wireline networks in one or more of the awarded municipalities to submit information on BSL eligibility**. See Appendix A for a complete list of municipalities in Round 1 Project Service Areas (PSA).

This purpose of this step is to ensure that MBI has the data necessary to make informed decisions on BSL eligibility, particularly with regards to existing broadband service coverage (i.e., potential overbuilds in awarded Gap Networks Round 1 PSAs). BSL eligibility information submitted by ISPs is not guaranteed to impact the final BSL lists for awardee projects but may be considered by MBI when making final BSL eligibility determinations.

BSL Information Submission Process

ISPs will have 1 week to submit recommendations and supporting evidence regarding BSL eligibility. BSLs may be identified as 1) already served, 2) already funded (or planned service) or 3) invalid BSL (i.e., not a serviceable location). ISPs must submit this information using the spreadsheet template provided by MBI. The spreadsheet has accompanying instructions that define the parameters for submitting information in accordance with pre-defined categories and includes a list of acceptable data sources for supporting evidence.

The following are key guidelines for this process:
- ISPs may only submit information on BSLs within municipalities where they operate an existing wireline broadband network with speeds of at least 100/20 Mbps.
- The three submission categories are: (1) Served BSL, (2) Funded/Planned BSL and (3) Invalid BSL.
- Feedback is to be provided in specified fields within the spreadsheet and supporting evidence files.
- Existing values in the spreadsheet may not be modified and any changes will be disregarded.
- Proposed changes to a BSL status must adhere to the BSL eligibility criteria in Appendix B.
- Acceptable data sources for review may be found in Appendix C. Other data sources will be considered on a case-by-case basis by MBI at their sole discretion.
- **BSLs are identified by Fabric Location ID, which therefore requires a NTIA Fabric Tier D license from CostQuest to participate in this process.**

About the BSL Information Submission Template

A detailed description of the fields included in the template spreadsheet may be found in Appendix D. At a high level the spreadsheet contains:
- A pre-populated master list of all BSLs located in an awarded Gap Networks Round 1 PSA that are 1) unserved or underserved according to the FCC broadband availability data as of 12/31/2023 and 2) do not have an existing enforceable funding commitment or planned service;

- national BSL Fabric location IDs, MBI assigned municipalities and FCC service status; and
- empty review fields to be populated by the ISP.

Evidence Guidelines

ISPs must provide clear evidence for each location with a proposed change to BSL eligibility, demonstrating that it does not meet the BSL eligibility criteria in Appendix B (e.g. it is not a valid BSL or has service available). The appropriate evidence will vary based on the reasons supplied for the proposed change in eligibility status. See Appendix E for the types of evidence accepted for each proposed BSL status and reason. Evidence data sources must also comply with the Gap Networks list of acceptable data sources of evidence in Appendix C.

Whenever possible, more than one type of evidence should be provided. For example, invalid BSL evidence should include both recent imagery (within the past 12 months) and property record information.

Evidence files must conform to the following requirements:

- Evidence file names must be formatted as:
  - [ISP Name]_[Location_ID]_[Data Source]
  - Additional relevant information may be appended to the end of the filename
- Evidence files must be placed into a single zip file with the ISP name and submission date.

Additional Information

Appendix A: Municipalities in Round 1 PSAs

Agawam
Amesbury
Amherst
Aquinnah
Ashburnham
Attleboro
Barre
Bernardston
Brewster
Chicopee
Chilmark
Dartmouth
Deerfield
Edgartown
Fall River
Falmouth
Florida
Gloucester
Greenfield
Harwich
Hawley
Holyoke
Lunenburg
Mashpee
Monroe
Monson
Nantucket
North Brookfield
Oak Bluffs
Palmer
Sandwich
Savoy
Sheffield
Springfield
Tisbury
Townsend
Ware
Warren
Wellfleet
West Tisbury
Yarmouth

Appendix B: BSL Eligibility Criteria

1	Valid BSL or CAI	Locations must be a valid BSL (e.g., premises that include one or more residence or business where fixed broadband internet access service is or could be installed) or Community Anchor Institution (CAI) per the CostQuest Fabric version 4 or provided evidence.
2	Unserved or Underserved	Locations must be unserved or underserved (e.g., not have access to service capable of speeds at or above 100/20 Mbps) per the current FCC fixed availability data as of 12/31/2023 or provided evidence.
3	No Enforceable Commitment	Locations must not have an enforceable federal, state or local funding commitment to provide broadband service (e.g., CAFII, E-ACAM, RDOF or TBCP federal grant programs or state Last Mile grant programs) for service that will be capable of speeds at or above 100/20 Mbps.
4	No Planned Service	Locations must not have planned broadband service to be completed by an ISP no later than 12/31/2024 that will be capable of speeds at or above 100/20 Mbps.

Appendix C: Acceptable Data Sources

This is a comprehensive list acceptable data sources for BSL eligibility review undertaken by all parties under the Gap Networks Grant Program. Additional types of evidence will be considered on a case-by-case basis, subject to further review and approval.

Use the bolded data source names below when referencing them in the Evidence_Description the BSL spreadsheet. Evidence based on MBI BEAD [Evidence Submission Guidelines](#), which are not included in the list below, should be identified accordingly as "BEAD" and a brief data source name.

BSL Data:

1) **CostQuest Fabric**: National Broadband Fabric version 4 (released 12/31/23)
2) **State BSLs**: [Statewide BSL dataset](#) developed by MBI for the MA Broadband Mapping Portal, maintained by MBI and available on the MBI Map Gallery web page
3) State BSL source datasets and supporting datasets from MassGIS and the City of Boston:
   a) **MassGIS Parcels**: [State Property Tax Parcels](#) and associated assessor data, maintained by MassGIS and available in the [Massachusetts Interactive Property Map](#)
   b) **MassGIS Buildings**: [State building footprints](#), maintained by MassGIS
   c) **Google Search Results**: Evidence from search results of a residential or business location, such as publicly available real estate records, news articles, or business websites
   d) Imagery:
      i) **MassGIS Imagery**: [2021 statewide aerial imagery](#), available from MassGIS
      ii) **Google Maps Imagery**: Aerial satellite imagery (check date taken)
      iii) **Google Street View**: View from street to supplement aerial imagery (check date taken)
      iv) **Other imagery**: Specify other recent imagery sources if needed (check date taken)

PSA Boundaries:

4) **MassGIS Towns**: [Municipal boundaries](#) maintained by MassGIS

Broadband Availability Data:

5) **FCC Availability**: Provider-reported [Fixed Broadband Availability Data as of 12/31/2023](#), available through the FCC National Broadband Map
6) **MBI Availability**: Provider-reported service area information from previous MBI broadband mapping projects and recent provider data update submissions to MBI
7) **Federal Grant**: Technical project details from documents related to a federal broadband grant program relating to service coverage, technology and speed commitments for the projects
8) **State Grant**: Technical project details from documents related to a state Last Mile grant program relating to service coverage, technology and speed commitments for the projects.
9) **ISP Website**: Service availability results using the search tools on a provider web site

Funding Commitment Data:

10) **FCC Funding Data**: Data available from the FCC [Federal Broadband Funding Map](#)
11) **NTIA Funding Data**: Deduplication data from the NTIA's [National Broadband Availability Map](#) (Login required. Only available to states.)

12) **State Grant**: Data from an MBI or EOED Last Mile grant program, including grantee deliverables and certifications and grantor program tracking documents

13) **Federal Grant**: Written correspondence from a recipient of an enforceable funding commitment regarding locations that will not be built using the awarded funding and the reason they will not be built (e.g., they are within the allowable percentage of locations to exclude or they have submitted a notice of default)

Additional ISP Evidence:

14) **ISP Infrastructure Data**: PDF maps or screen shots with Personally Identifiable Information (PII) or other sensitive information removed

15) **Customer Service Records**: Exports (e.g., PDF tables/reports or screen shots) with PII or other sensitive information removed

16) **ISP Certification**: Letter of certification signed by ISP representative referencing the infrastructure data or customer service records and attesting to its accuracy

17) **Field Photos**: Geo-tagged and labeled photos taken in the field with proof of infrastructure or BSL with any associated data files required for context

Appendix D: BSL Information Submission Template Data & Fields

The prepopulated BSL information is based on data from the current FCC National Broadband Map, based primarily on CostQuest BSL Fabric version 4 (released 12/31/2023) and FCC availability data as of 12/31/2023 (released on 5/14/2024).

Round 1 Master BSL List: Populated by MBI

These pre-populated fields may not be modified by the ISP.

Field Name	Field Description
Location_ID	Location_ID from CostQuest Fabric.
Fabric_Date	The release date of the CostQuest Fabric version the Location_ID is associated with.
Municipality_Name	Name of the municipality (not community name) the BSL coordinates fall within, based on spatial analysis using MassGIS town boundary data.
Service_Status	Fixed broadband availability status from the FCC National Broadband Map as of 12/31/2023, released on 5/14/2024. Valid values: Unserved & Underserved

Information Submission Fields: Populated by ISP

The Proposed_Reason and Evidence_Description fields must be populated for any location where the Proposed_BSL_Stauts field is populated.

Field Name	Field Description
Proposed_BSL_Status	Standardized list of acceptable proposed BSL eligibility status values. Valid values: 1. Served BSL 2. Funded/Planned BSL 3. Invalid BSL
Proposed_Reason*	*Required if Proposed_BSL_Status is populated.* Standardized list of reasons for a proposed change in BSL eligibility status that correspond to Proposed_BSL_Status values. Valid values: 1a. 100/20 Mbps or greater service available 1b. Existing customer 1c. Planned service to be complete by 12/31/24 2a. Existing federal funding commitment 2b. Existing state funding commitment 2c. Existing local gov't funding commitment 3a. No building present 3b. Non-serviceable structure
Evidence_Description*	*Required if Proposed_BSL_Status is populated.* Brief description of the type of evidence provided by the awardee. Descriptions of evidence used should reference the bolded name(s) from the approved data source list in Appendix C. Multiple pieces of evidence may be listed.

Appendix E: Supporting Evidence Requirements

Options for Proposed BSL Status	Acceptable Evidence
1. Served BSL	
1a. 100/20 Mbps or greater service available	Screenshot of ISP website service availability search including service address. Map or diagram of existing infrastructure.
1b. Existing customer	Customer service records with personally identifiable information (PII) removed.
1c. Planned service to be complete by 12/31/24	Signed letter of certification with technical project details including service coverage, technology, and speed commitments. Map or diagram of planned infrastructure. Construction contracts and permits.
2. Funded BSL	
2a. Existing federal funding commitment	Legally binding agreement for the funds that will be provided to serve this location.
2b. Existing state funding commitment	Legally binding agreement for the funds that will be provided to serve this location.
2c. Existing local government funding commitment	Legally binding agreement for the funds that will be provided to serve this location.
3. Invalid BSL	
3a. No building present	Screenshot of property data. Screenshot of the BSL with 2023/24 aerial imagery.
3b. Non-serviceable structure	Screenshot of property data. Screenshot of the BSL with 2023/24 aerial imagery.