

# CALIFORNIA BEAD CHALLENGE PROCESS: SUBMITTING INDIVIDUAL CHALLENGES

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June 2024

# AGENDA

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- I. BEAD overview
- II. Challenge Process overview
- III. Role of individuals
- IV. How to submit an individual challenge
- V. Next steps

# BEAD OVERVIEW

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# BROADBAND 101

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- **Why internet speeds are important**

- Internet speeds are measured with two numbers: download and upload
- Speeds are measured using megabits per second (Mbps)
- 100/20 Mbps means 100 megabits downloaded per second and 20 megabits uploaded per second
- Speeds are the standard by which funding needs are determined

- **Broadband technologies**

- Fiber = fiber-optic cable, small tubes of glass that transmit light at high speeds, the most future-proof and high-capacity technology
- Cable = coaxial cables, originally used for cable TV transmission
- DSL = copper wiring, originally used for telephone service
- Fixed wireless = wireless signals from towers (access points) to your home

# BEAD

## OVERVIEW

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What is the BEAD Program?

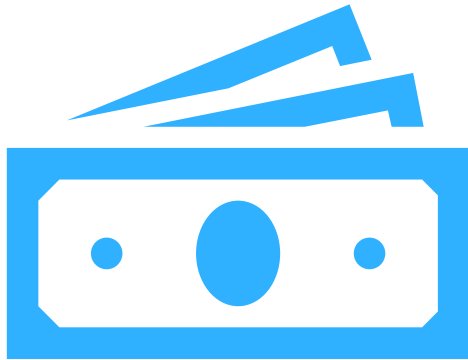


- The Broadband Equity, Access, and Deployment (BEAD) Program was created by the bipartisan Infrastructure Investment and Jobs Act (IIJA) in 2021
- Allocates \$42.45 billion of federal funding to all 50 states, Washington D.C., and territories
- Administered by the National Telecommunications and Information Administration (NTIA)
- Goal of expanding high-speed internet access through infrastructure deployment

# FUNDING PRIORITY

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How will BEAD funding be prioritized?



1. Top priority: Unserved areas (locations with internet speeds below 25/3 Mbps)
2. Second priority: Underserved areas (locations with speeds between 25/3 and 100/20 Mbps)
3. Third priority: Community anchor institutions\* (those with internet service under 1 Gbps symmetrical)

The BEAD Program requires the state to deliver service to all unserved and underserved areas.

\*Community anchor institutions are entities like schools, libraries, hospitals, and community support organizations that facilitate broadband use by vulnerable populations

# THE BEAD PROGRAM IN CALIFORNIA

In June 2023, California was allocated \$1.86 billion in BEAD funds that will become available following completion of the federal planning and approval cycle.

The CPUC has submitted to the federal government the Five-Year Action Plan and Initial Proposal Volumes I & II.

BEAD Planning

2023

Challenge Process, followed by grant program

2024

Deployment

2025

## WHY IS THIS IMPORTANT?

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- BEAD funding is unprecedented; California is allocated \$1.86 billion for broadband infrastructure
- The Challenge Process is the only opportunity for entities to propose changes to the FCC National Broadband Map in terms of locations eligible for BEAD funding
- Once the final map is approved, only those areas identified as eligible will receive funding for last-mile infrastructure
- The ultimate goal is to get high-speed connectivity to all broadband serviceable locations



# BEAD CHALLENGE PROCESS OVERVIEW

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# PURPOSE

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What is the BEAD Challenge Process?



- The Challenge Process will determine locations and community anchor institutions within the state that are eligible for BEAD funding
- It must confirm whether existing data is correct about which areas lack adequate internet service
- Challengers offer input on whether specific locations are not accurately reported in the datasets and therefore should be eligible for BEAD funding

## RELEVANCE

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Why is the BEAD Challenge Process so important?



- It will determine eligibility for BEAD funding (which totals \$1.86 billion)
- It is the single best chance to correct the FCC's Broadband Data Map
- You can advocate for your community by providing evidence that it is unserved or underserved
- The improved data will help the BEAD Program and future programs allocate funding to the areas that need it most

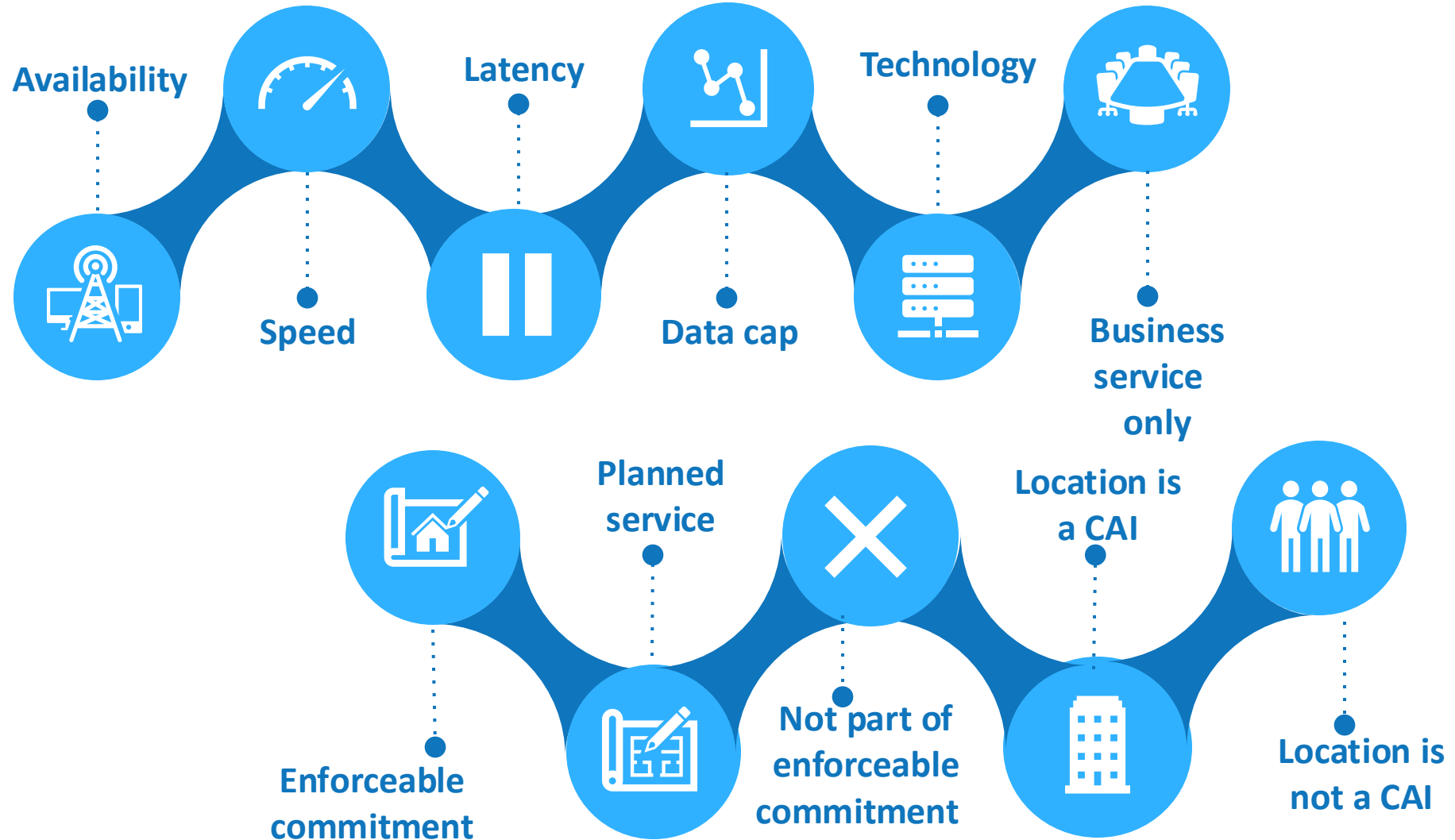
## WHAT CAN BE CHALLENGED?

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- Internet availability and other specifications (including speed, latency, data caps, and technology)
- Community anchor institution eligibility and identification
- Enforceable commitments
- Planned service

# CHALLENGE TYPES



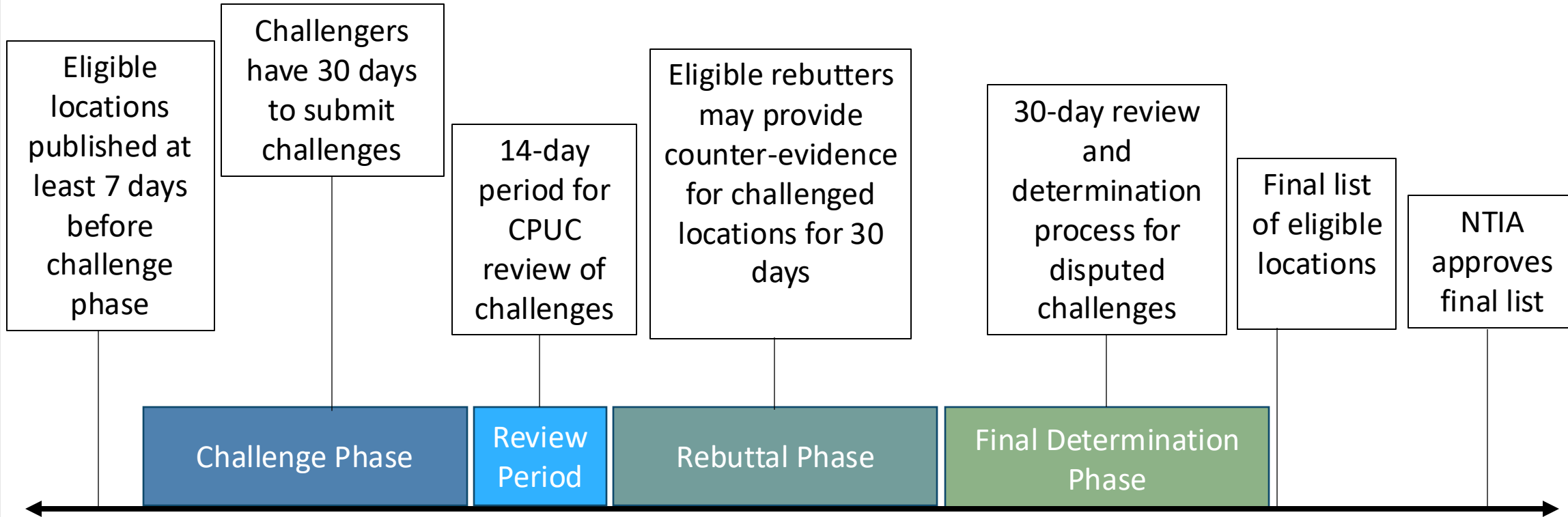
# AREA AND MULTI-DWELLING UNIT (MDU)

## CHALLENGES

Area and MDU challenges can apply for the following challenge types:

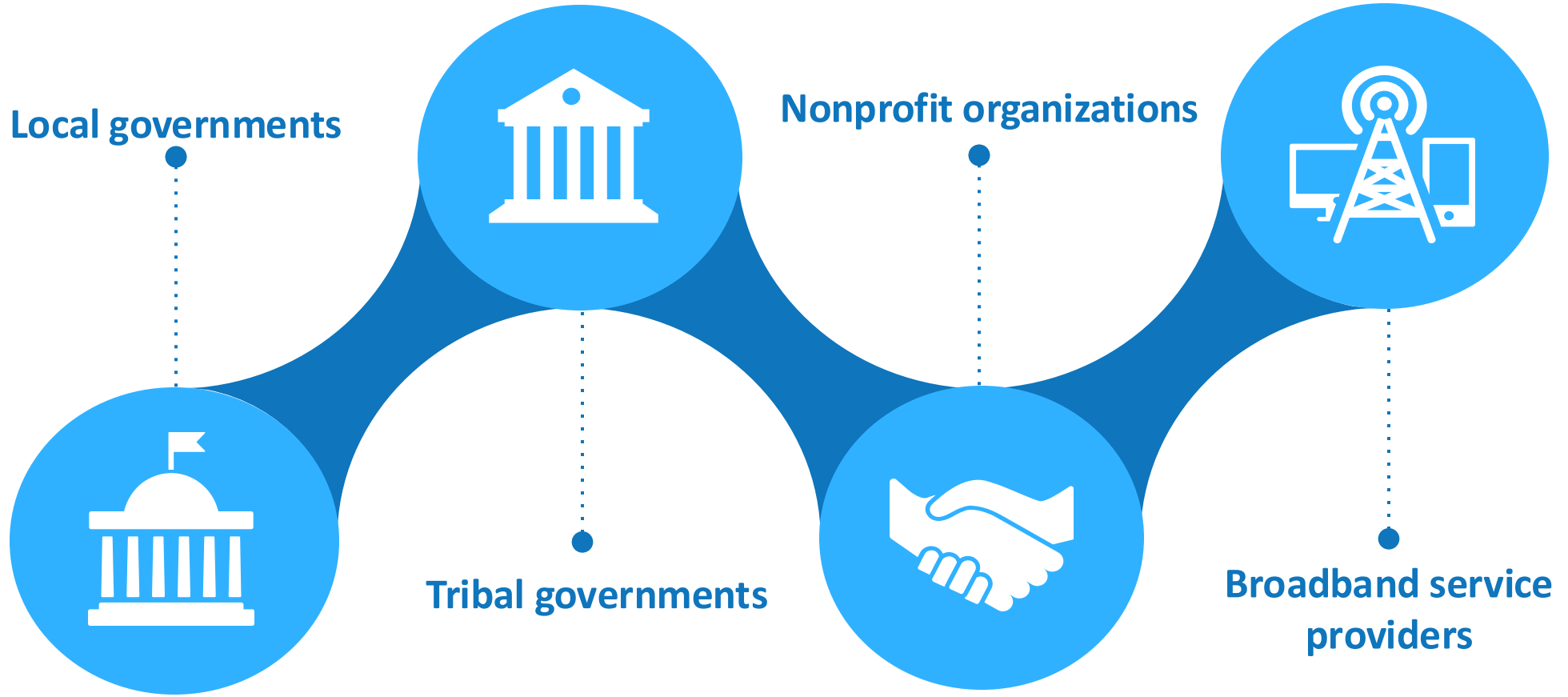
- Availability
  - Speed
  - Latency
  - Data cap
  - Technology
- If enough challenges are submitted in a particular area or building, all the locations in that area or MDU become “challenged” and the provider must show they are sufficiently served
  - Area challenges are triggered if six or more broadband serviceable locations using a specific technology and reportedly served by a single broadband service provider within a census block group are challenged
  - MDU challenges are triggered if challenges are submitted for one unit for MDUs with less than 15 units, two units for MDUs of between 16 and 24 units, and at least three units for larger MDUs

# TIMELINE OF EVENTS



# WHO CAN SUBMIT A CHALLENGE?

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# CAN INDIVIDUALS PARTICIPATE?

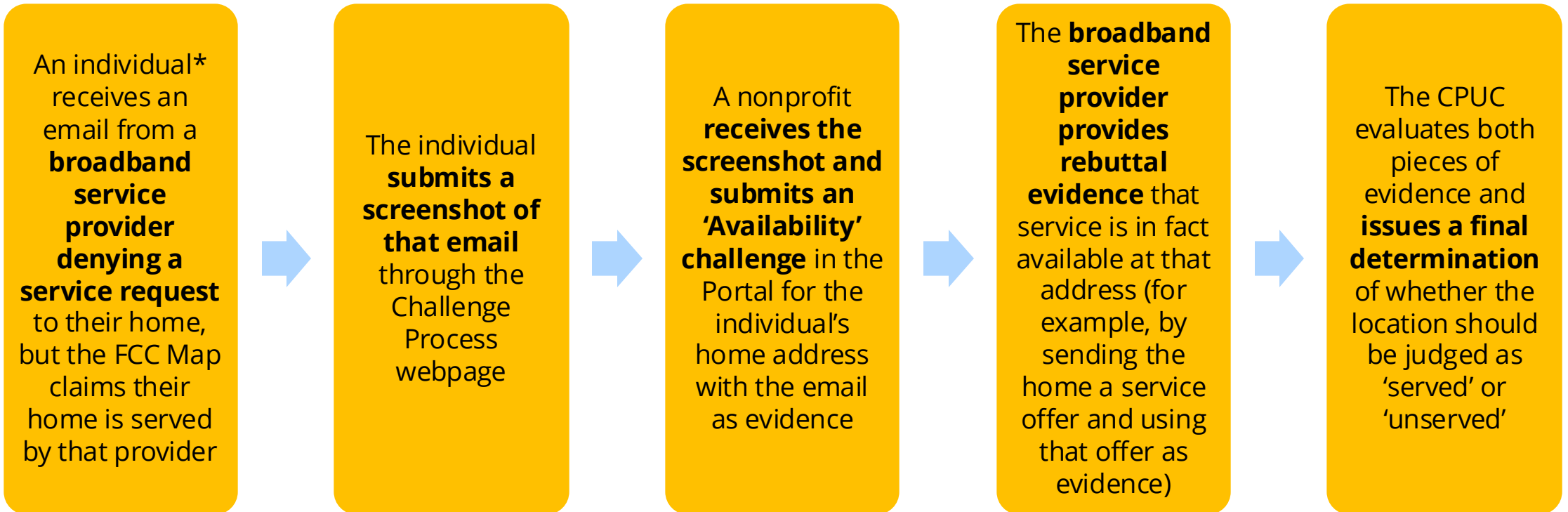


- While NTIA requirements don't allow individuals to submit challenges directly, they can gather and submit evidence for permissible challengers to submit on their behalf to the CPUC
- This presentation will explain exactly how individuals can submit evidence to permissible challengers

# HOW DO INDIVIDUALS SUBMIT CHALLENGES?

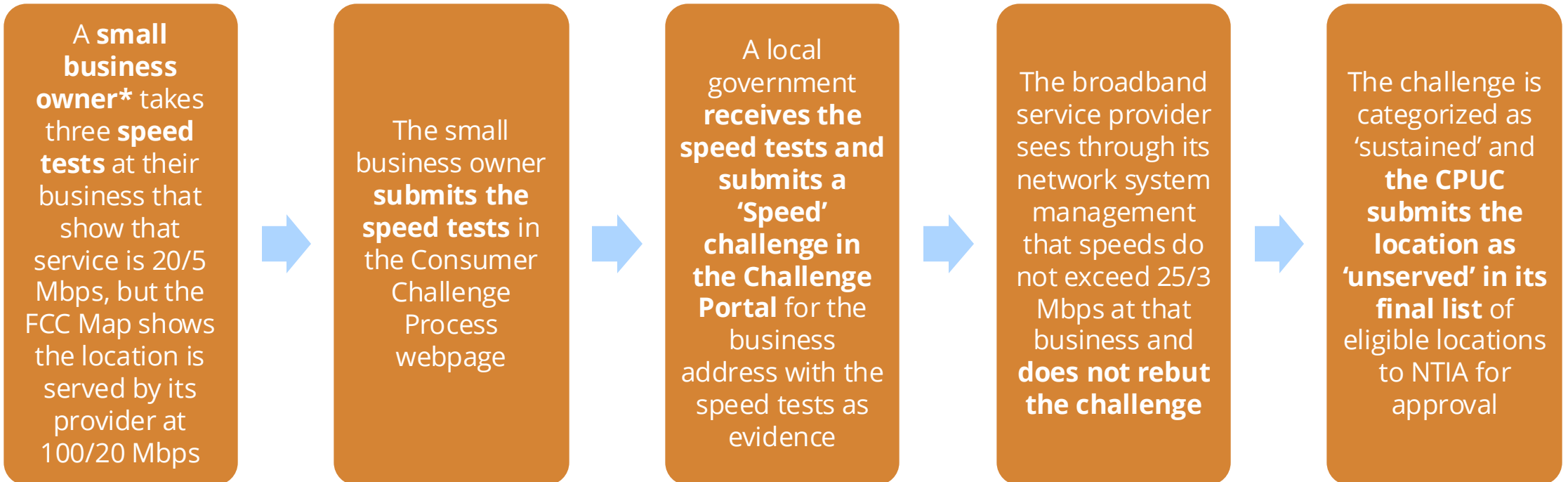
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# CONSUMER CHALLENGE PROCESS SEQUENCE: EXAMPLE 1



\*Note: this example is applicable to any individual challenger

## CONSUMER CHALLENGE PROCESS SEQUENCE: EXAMPLE 2



\*Note: this example is applicable to any individual challenger

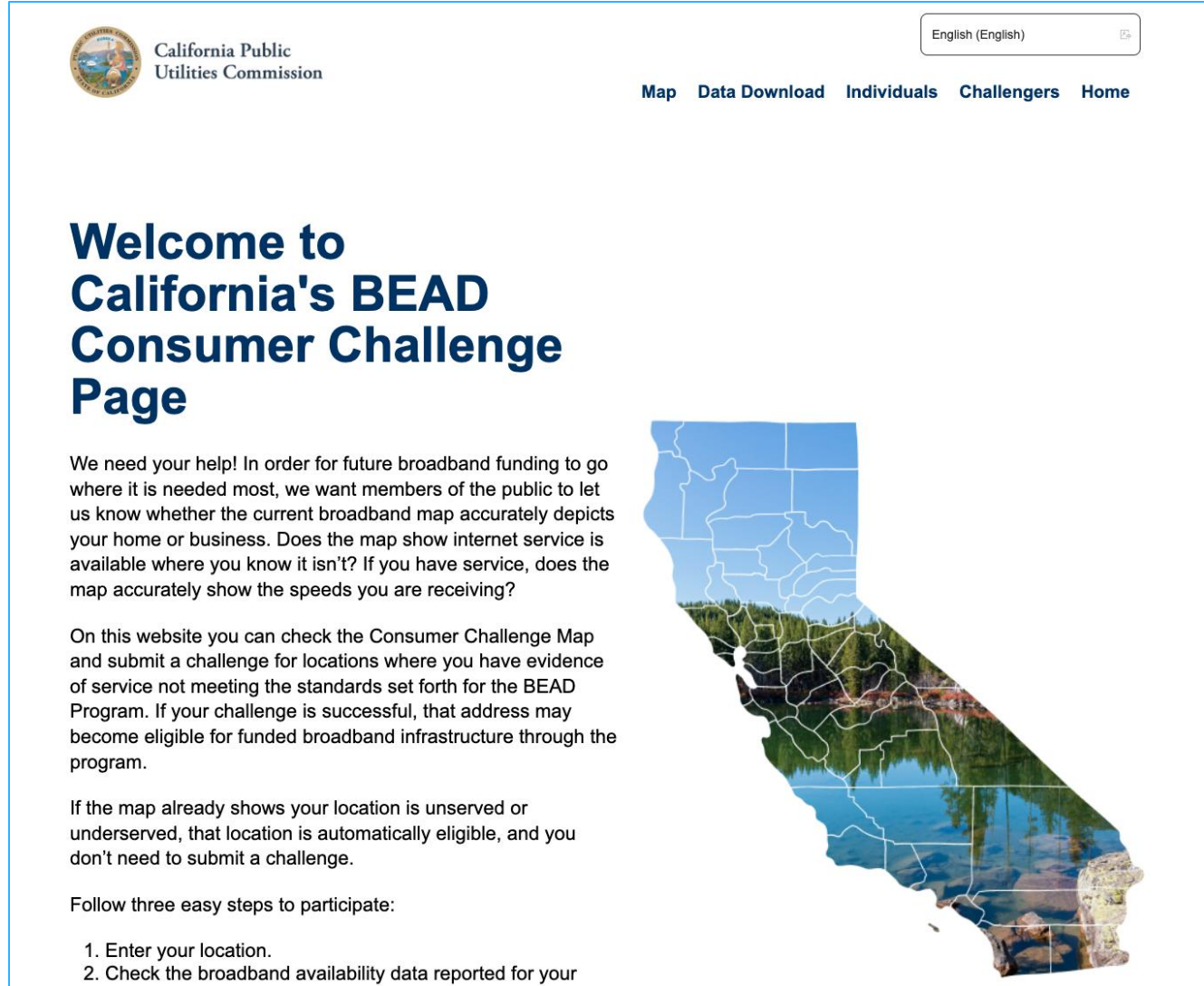
## CONSUMER CHALLENGE SUBMISSION WEBPAGE

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- Consumers use a designated page open to the public for evidence submission
- Consumers can upload files (e.g., speed tests, communications from service providers) and fill out all required evidentiary information (name, address, service provider, etc.)
  - There is also a specific “speed test” functionality in the publicly-available evidence submission page to run speed tests and download their result

# CONSUMER CHALLENGE SUBMISSION

## Landing page



The screenshot shows the landing page for the California BEAD Consumer Challenge. At the top left is the California Public Utilities Commission logo. To its right is the text "California Public Utilities Commission". In the top right corner, there is a language selection dropdown menu set to "English (English)". Below the logo and text is a navigation menu with links for "Map", "Data Download", "Individuals", "Challengers", and "Home". The main heading is "Welcome to California's BEAD Consumer Challenge Page". Below this is a paragraph of text asking for help to improve broadband mapping. Another paragraph explains how to submit a challenge. A third paragraph states that unserved or underserved locations are automatically eligible. Finally, there are three steps to participate, with the first two listed: "1. Enter your location." and "2. Check the broadband availability data reported for your". On the right side of the page is a large graphic of the state of California, where the northern portion is a solid light blue, and the southern portion is a scenic landscape with a lake, trees, and mountains.

California Public Utilities Commission

English (English)

[Map](#) [Data Download](#) [Individuals](#) [Challengers](#) [Home](#)

## Welcome to California's BEAD Consumer Challenge Page

We need your help! In order for future broadband funding to go where it is needed most, we want members of the public to let us know whether the current broadband map accurately depicts your home or business. Does the map show internet service is available where you know it isn't? If you have service, does the map accurately show the speeds you are receiving?

On this website you can check the Consumer Challenge Map and submit a challenge for locations where you have evidence of service not meeting the standards set forth for the BEAD Program. If your challenge is successful, that address may become eligible for funded broadband infrastructure through the program.

If the map already shows your location is unserved or underserved, that location is automatically eligible, and you don't need to submit a challenge.

Follow three easy steps to participate:

1. Enter your location.
2. Check the broadband availability data reported for your

# CONSUMER CHALLENGE SUBMISSION

## 1. Select location

Enter address or select a location from the map

The screenshot displays the 'Select Location' step of the BEAD Challenge Submission process. At the top left is the BEAD logo. In the top right, there is a language dropdown menu set to 'English (English)' and a 'Home' link. Below the logo is a progress bar with five steps: '1. Select Location', '2. Comment Type', '3. Comment Details', '4. Evidence & Documentation', and '5. Attestation'. The '1. Select Location' step is currently active.



The main heading is 'Select Location'. Below it, the instructions read: 'Please search for the location you would like to comment on and then select the point on the map. Note: If a location is already eligible for federal funding through the BEAD Program, it will not be selectable on the map and cannot be commented on. If you don't see your address, select the point that you believe nearest to your rooftop.'

The map area features a search bar at the top with the text 'Search'. The map shows a satellite view of California with a black outline of the state and a grid of blue lines representing BEAD project areas. A legend at the bottom of the map indicates 'Performance Category' with three options: 'Unserved' (represented by a red dot), 'Underserved' (represented by a blue dot), and 'Served' (represented by a grey dot).

At the bottom of the interface are two buttons: 'Cancel' and 'Next'.

# CONSUMER CHALLENGE SUBMISSION

## 2. Expand details

 English (English)  [Home](#)

1. Select Location   **2. Comment Type**   3. Comment Details   4. Evidence & Documentation   5. Attestation

Selected address:  
**7031 Turlock Rd, Snelling, CA 95369** Served [Expand Details](#)

**Select Comment Type**  
Please select which type of comment you would like to submit.

**Availability**  
The broadband services reported as available at your location on the map are not actually available.

**Speed**  
The actual speeds reported at your location on the map fall below the BEAD Program's eligibility thresholds.

**Latency**  
The actual round-trip latency of services available at your location exceeds 100 milliseconds.

**Data Cap**  
The services available at your location have a data limit below 600 GB/month.

**Technology**  
The type of technology (ex: Fiber Optic, Cable, Etc.) reported as available at your location on the map is incorrect.

**Business Service Only**  
The services reported on the map are available to Businesses only, not Residents.

**Other**  
Use this option to submit a general comment about the broadband options available at your location.

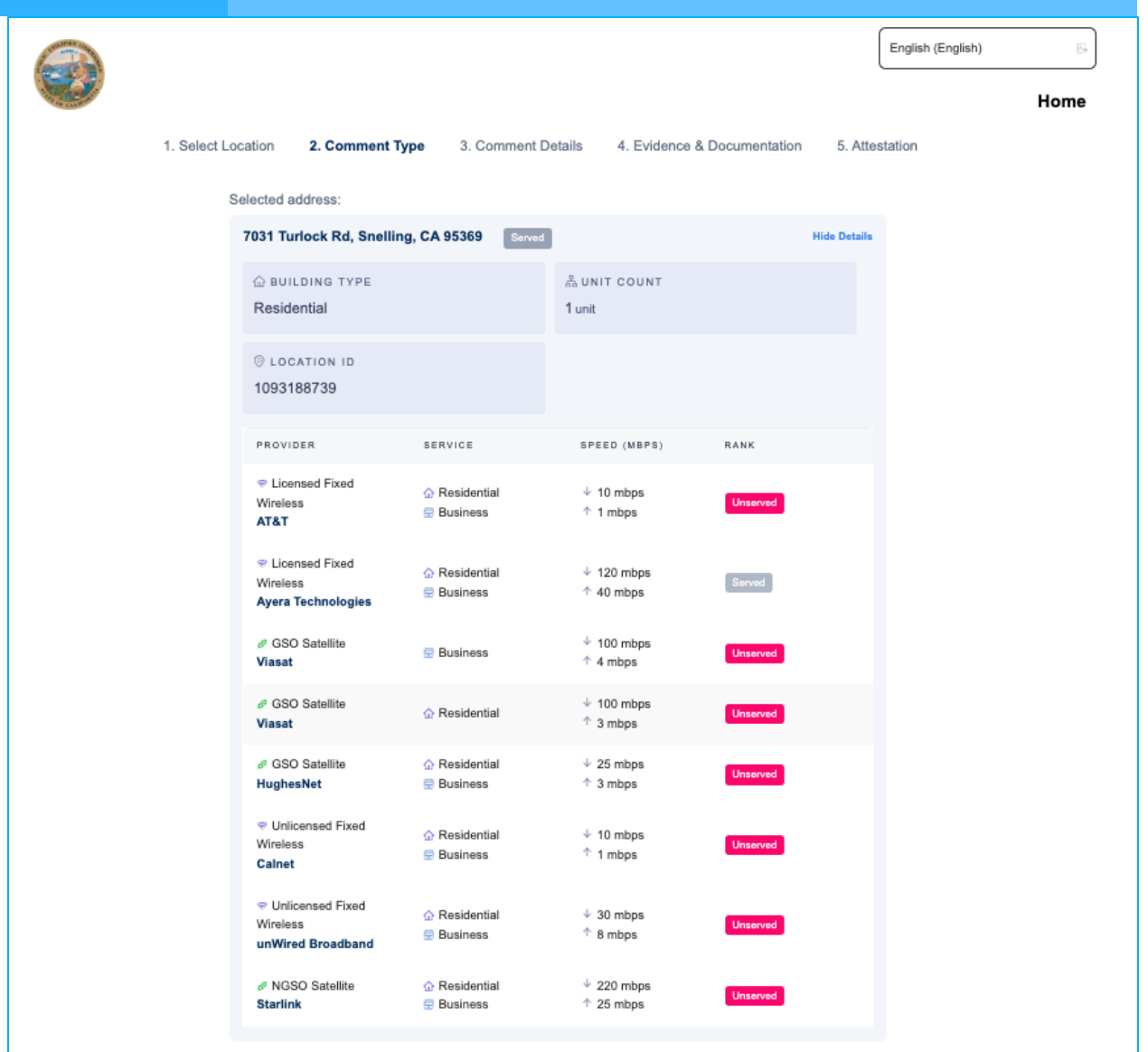
Back Next



# CONSUMER CHALLENGE SUBMISSION

## 3. View details

Shows reported status of the location in this map view—whether it is claimed to be served and what speeds are reported—to see if you should challenge



English (English)

Home

1. Select Location 2. **Comment Type** 3. Comment Details 4. Evidence & Documentation 5. Attestation

Selected address:

**7031 Turlock Rd, Snelling, CA 95369** Served [Hide Details](#)

**BUILDING TYPE**  
Residential

**UNIT COUNT**  
1 unit

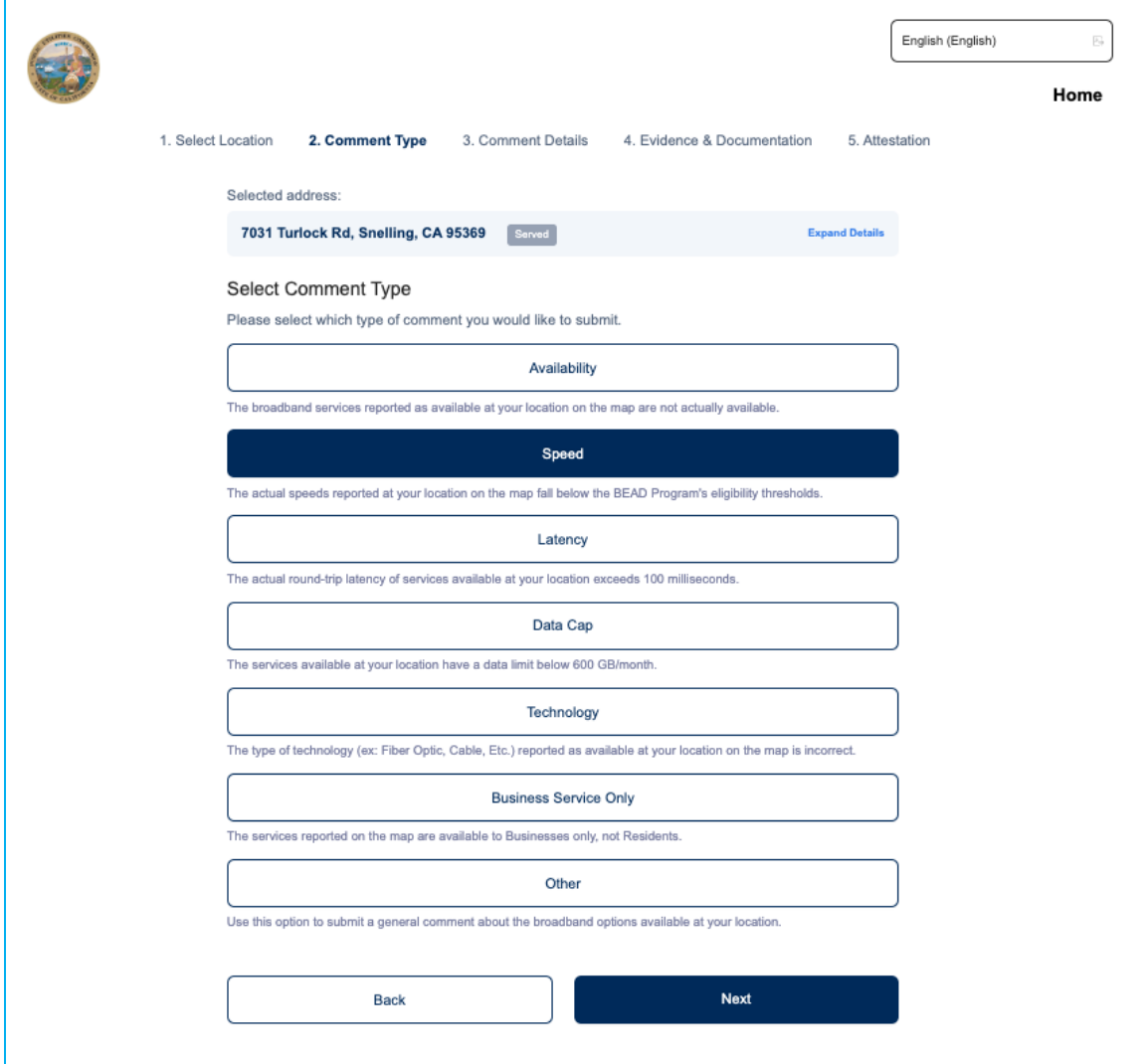
**LOCATION ID**  
1093188739

PROVIDER	SERVICE	SPEED (MBPS)	RANK
Licensed Fixed Wireless <b>AT&amp;T</b>	Residential	↓ 10 mbps	<span>Unserved</span>
	Business	↑ 1 mbps	
Licensed Fixed Wireless <b>Ayera Technologies</b>	Residential	↓ 120 mbps	<span>Served</span>
	Business	↑ 40 mbps	
GSO Satellite <b>Viasat</b>	Business	↓ 100 mbps ↑ 4 mbps	<span>Unserved</span>
	Residential	↓ 100 mbps ↑ 3 mbps	
GSO Satellite <b>HughesNet</b>	Residential	↓ 25 mbps	<span>Unserved</span>
	Business	↑ 3 mbps	
Unlicensed Fixed Wireless <b>Calnet</b>	Residential	↓ 10 mbps	<span>Unserved</span>
	Business	↑ 1 mbps	
Unlicensed Fixed Wireless <b>unWired Broadband</b>	Residential	↓ 30 mbps	<span>Unserved</span>
	Business	↑ 8 mbps	
NGSO Satellite <b>Starlink</b>	Residential	↓ 220 mbps	<span>Unserved</span>
	Business	↑ 25 mbps	

# CONSUMER CHALLENGE SUBMISSION

## 4. Select Challenge type

Availability and Speed are the most common



The screenshot displays the 'Select Comment Type' step of a consumer challenge submission process. At the top left is the California State Seal. At the top right, there is a language dropdown menu set to 'English (English)' and a 'Home' link. A progress bar below the seal shows five steps: 1. Select Location, 2. Comment Type (current step), 3. Comment Details, 4. Evidence & Documentation, and 5. Attestation. The 'Selected address' is '7031 Turlock Rd, Snelling, CA 95369', with a 'Served' status and an 'Expand Details' link. The 'Select Comment Type' section asks the user to choose a comment type. The 'Speed' option is highlighted in dark blue. Below each option is a brief description of the challenge type.

English (English) Home

1. Select Location 2. **Comment Type** 3. Comment Details 4. Evidence & Documentation 5. Attestation

Selected address:  
7031 Turlock Rd, Snelling, CA 95369 Served Expand Details

**Select Comment Type**  
Please select which type of comment you would like to submit.

Availability  
The broadband services reported as available at your location on the map are not actually available.

**Speed**  
The actual speeds reported at your location on the map fall below the BEAD Program's eligibility thresholds.

Latency  
The actual round-trip latency of services available at your location exceeds 100 milliseconds.

Data Cap  
The services available at your location have a data limit below 600 GB/month.

Technology  
The type of technology (ex: Fiber Optic, Cable, Etc.) reported as available at your location on the map is incorrect.

Business Service Only  
The services reported on the map are available to Businesses only, not Residents.

Other  
Use this option to submit a general comment about the broadband options available at your location.

Back Next

# CONSUMER CHALLENGE SUBMISSION

## 5. Running a speed test

English (English)

**Home**

1. Select Location   2. Comment Type   **3. Comment Details**   4. Evidence & Documentation   5. Attestation

Selected address:

**7031 Turlock Rd, Snelling, CA 95369** Served Expand Details

### Speed Details

As part of the BEAD Program's evidentiary standards, speed corrections to the map require three performance tests taken on three different days. [Click here](#) to take the performance test from your location and set up reminders to take additional tests. Once you have collected your tests, proceed with completing the Speed Comment below.

You can submit a general "Other" comment in Step 2, if you choose not to provide the above requested evidence or are unable to fill out the required fields below.

If you do not see your internet provider or technology type in the dropdown, your service is already considered underserved

\* 1. Enter your name

\* 2. Enter your email address

\* 3. Select the internet provider

\* 4. Select the technology type

# CONSUMER CHALLENGE SUBMISSION

## 6. Provide details

This screenshot shows the '6. Provide details' step of the challenge submission process. At the top, there is a navigation bar with five steps: 1. Select Location, 2. Comment Type, 3. **Comment Details**, 4. Evidence & Documentation, and 5. Attestation. The current step is highlighted. Below the navigation bar, the selected address is '7031 Turlock Rd, Snelling, CA 95369'. Underneath, the 'Speed Details' section explains that performance tests are required for speed corrections. A blue information box provides instructions on when to use a general 'Other' comment. The form contains three required fields: '1. Enter your name' (filled with 'John Smith'), '2. Enter your email address' (filled with 'johnsmith@johnsmith.com'), and '3. Select the internet provider' (a dropdown menu with 'Ayera Technologies' selected and circled in red). Below this is a 'Please select a technology' dropdown. At the bottom are 'Back' and 'Next' buttons.

This detailed screenshot focuses on the 'Speed Details' section of the form. It shows the selected address '7031 Turlock Rd, Snelling, CA 95369' and the 'Speed Details' heading. The explanatory text about performance tests is visible. The blue information box is also present. The form fields are: '1. Enter your name' (John Smith), '2. Enter your email address' (johnsmith@johnsmith.com), and '3. Select the internet provider' (Ayera Technologies). The '4. Select the technology type' dropdown is circled in red, showing 'Please select a technology' and 'Licensed Fixed Wireless' as an option. 'Back' and 'Next' buttons are at the bottom.

# CONSUMER CHALLENGE SUBMISSION

## 7. Upload evidence

Will also be asked to submit information about the evidence (date, type, description, etc.)

This example is for a Speed Challenge

The screenshot shows a web interface for submitting evidence. At the top left is a circular logo. At the top right, there is a language dropdown menu set to 'English (English)' and a 'Home' link. Below the logo is a progress bar with five steps: '1. Select Location', '2. Comment Type', '3. Comment Details', '4. Evidence & Documentation' (which is highlighted), and '5. Attestation'. The main content area shows the 'Selected address:' as '7031 Turlock Rd, Snelling, CA 95369' with a 'Saved' button and an 'Expand Details' link. Below this is the heading 'Provide Evidence & Documentation for your Speed Comment' and a note: 'Upload the results of your three speed tests below. Please ensure that the results are from tests taken on three different days.' There is a link 'Take the performance test' and a light blue box with a trash icon and the text 'If you are unable to provide evidence, choose the "Other" comment type in Step 2'. A dashed box contains the instruction 'Click or drag files to this area to upload' and 'Support for a single or bulk upload.' Below this are three file upload entries: 'Speed Test 1.png', 'Speed Test 2.png', and 'Speed Test 3.jpeg'. Each entry has a red circle around the filename and an 'Add details' button to its right. At the bottom are 'Back' and 'Next' buttons.

English (English) Home

1. Select Location 2. Comment Type 3. Comment Details 4. Evidence & Documentation 5. Attestation

Selected address:

7031 Turlock Rd, Snelling, CA 95369 Saved Expand Details

Provide Evidence & Documentation for your Speed Comment

Upload the results of your three speed tests below. Please ensure that the results are from tests taken on three different days.

[Take the performance test](#)

If you are unable to provide evidence, choose the "Other" comment type in Step 2

Click or drag files to this area to upload  
Support for a single or bulk upload.

Speed Test 1.png Add details

Speed Test 2.png Add details

Speed Test 3.jpeg Add details

Back Next

# CONSUMER CHALLENGE SUBMISSION

## 8. Enter information

This example is for a Speed Challenge

The screenshot displays a web application interface for submitting evidence for a speed challenge. A modal window titled "Provide Evidence" is open, overlaying the main form. The modal contains the following fields and instructions:

- 1. Indicate how the speed test was conducted:** A dropdown menu with the selected option "Speed test performed on this website or another speed te...".
- 2. Enter the date and time this speed test was taken:** A date and time picker showing "2024-06-13 14:39:15".
- 3. Provide your IP address:** A text input field containing "12345".
- 4. Enter the download speed in Mbps:** A text input field with "45.00" and a unit selector set to "Mbps".
- 5. Enter the upload speed in Mbps:** A text input field with "35.00" and a unit selector set to "Mbps".
- 6. Enter the roundtrip latency in ms:** A text input field with "45.00" and a unit selector set to "ms".

At the bottom of the modal are "Cancel" and "Save" buttons. The background form shows a progress bar with steps: "1. Select Location", "2. Co...", "3. Provide Evidence", "4. Upload Results", and "5. Attestation". The "3. Provide Evidence" step is currently active. The address "7031 Turlock R..." is visible. There are also "Back" and "Next" buttons at the bottom of the page.

# CONSUMER CHALLENGE SUBMISSION

## 9. View evidence

This example is for a Speed Challenge

English (English) Home

1. Select Location 2. Comment Type 3. Comment Details **4. Evidence & Documentation** 5. Attestation

Selected address:  
**7031 Turlock Rd, Snelling, CA 95369** Served Expand Details

**Provide Evidence & Documentation for your Speed Comment**  
 Upload the results of your three speed tests below. Please ensure that the results are from tests taken on three different days.

[Take the performance test](#)

If you are unable to provide evidence, choose the "Other" comment type in Step 2

**Click or drag files to this area to upload**  
 Support for a single or bulk upload.

- Speed Test 1.png
- Speed Test 2.png
- Speed Test 3.jpeg

**Speed Test 1.png** Edit

**Speed Test Method:** Speed test performed on laptop or desktop computer within immediate proximity of the residential gateway (e.g. WiFi connection in the same room as gateway)

**Date:** 6/13/2024, 2:39:15 PM **IP Address:** 12345

**Download Speed:** 45 Mbps **Upload Speed:** 35 Mbps **Latency:** 45 ms

**Speed Test 2.png** Edit

**Speed Test Method:** Speed test performed on laptop or desktop computer within immediate proximity of the residential gateway (e.g. WiFi connection in the same room as gateway)

**Date:** 6/12/2024, 5:41:15 PM **IP Address:** 12345

**Download Speed:** 45 Mbps **Upload Speed:** 36 Mbps **Latency:** 24 ms

**Speed Test 3.jpeg** Edit

**Speed Test Method:** Speed test performed on laptop or desktop computer within immediate proximity of the residential gateway (e.g. WiFi connection in the same room as gateway)

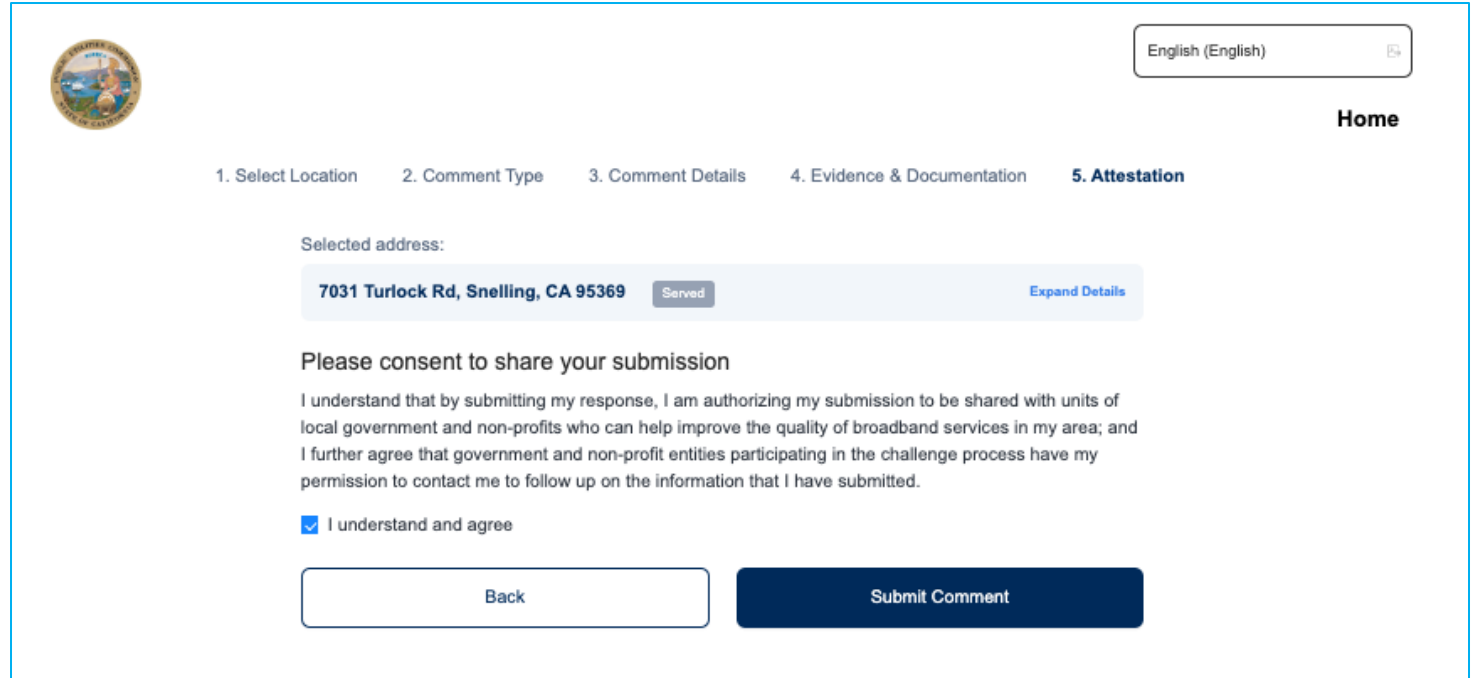
**Date:** 6/10/2024, 5:43:35 PM **IP Address:** 12345

**Download Speed:** 45 Mbps **Upload Speed:** 45 Mbps **Latency:** 45 ms


Back Next

# CONSUMER CHALLENGE SUBMISSION

## 10. Certify attestation and submit



The screenshot shows the 'Attestation' step of the challenge submission process. It features a navigation bar with five steps: 1. Select Location, 2. Comment Type, 3. Comment Details, 4. Evidence & Documentation, and 5. Attestation (highlighted). A 'Home' link is visible in the top right. The main content area displays the 'Selected address' as '7031 Turlock Rd, Snelling, CA 95369' with a 'Saved' button and an 'Expand Details' link. Below this is a consent section titled 'Please consent to share your submission' with a paragraph of text and a checked checkbox labeled 'I understand and agree'. At the bottom, there are two buttons: 'Back' and 'Submit Comment'.

English (English) 

Home

1. Select Location 2. Comment Type 3. Comment Details 4. Evidence & Documentation **5. Attestation**

Selected address:

7031 Turlock Rd, Snelling, CA 95369 Saved [Expand Details](#)

**Please consent to share your submission**

I understand that by submitting my response, I am authorizing my submission to be shared with units of local government and non-profits who can help improve the quality of broadband services in my area; and I further agree that government and non-profit entities participating in the challenge process have my permission to contact me to follow up on the information that I have submitted.

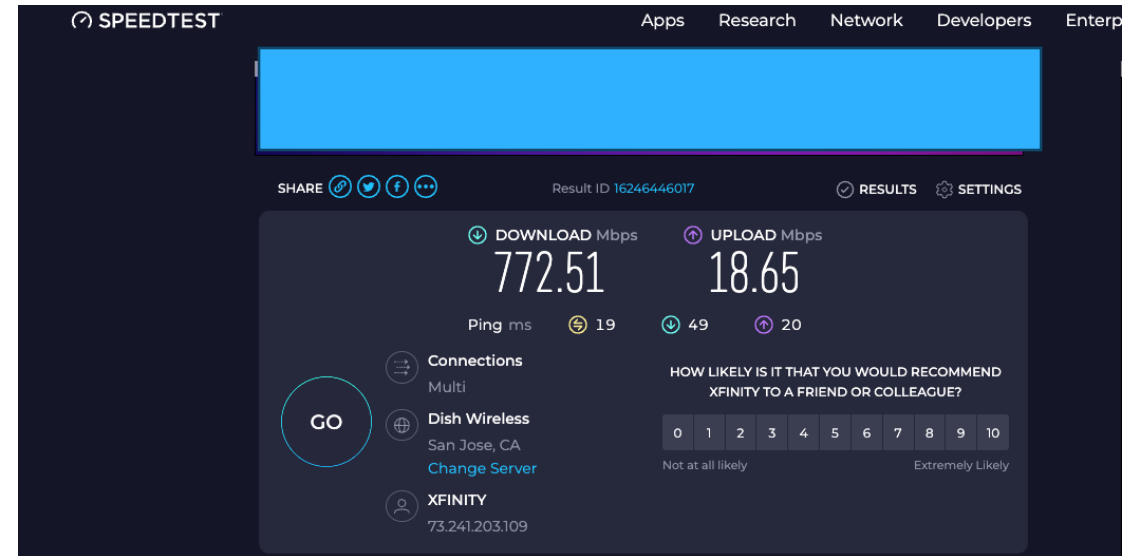
I understand and agree

[Back](#) [Submit Comment](#)



# CONSUMER CHALLENGE SUBMISSION OF SPEED TESTS

- An individual can run a speed test in the Consumer Challenge evidence submission webpage
- However, they need to remember to run speed tests and download results on three separate days
  - Only then should they upload those same results to the 'Speed' challenge submission and submit the challenge
- **Acceptable other speed test sites:**
  - Ookla (speedtest.net)
  - M-Lab (speed.measurementlab.net)
  - Cloudflare (speed.cloudflare.com)
  - Netflix (fast.com)



# CONSUMER CHALLENGE SUBMISSION OF SPEED TESTS

## 1. Enter address

The screenshot shows the California Public Utilities Commission (CPUC) website interface. At the top left is the CPUC logo and the text "California Public Utilities Commission". At the top right is a language selection dropdown menu set to "English (English)". Below the logo and menu is a navigation bar with links for "Map", "Data Download", "Individuals", "Challengers", and "Home".

The main content area features a light blue box titled "Before We Begin...". Inside this box, the text reads: "Address information is required to submit your feedback on broadband. Please enter your address below. It will not be shared with the public. For more information, please see the CPUC's [privacy policy](#)".

Below this text, it states: "You can either type in the address in the 'Enter a location' box or click 'Current location' to use your device's current location as the address."

Further down, it says: "If you do not have internet service at the address you are entering, select the option below."

There is a checkbox labeled "I do not have internet service at this address".

Below the checkbox is a text input field with the placeholder text "Enter a location".

Underneath the input field is a button labeled "Current Location" with a location pin icon.

At the bottom right of the light blue box is a dark blue "Next" button.

# CONSUMER CHALLENGE SUBMISSION OF SPEED TESTS

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## 2. Enter other information and attestation

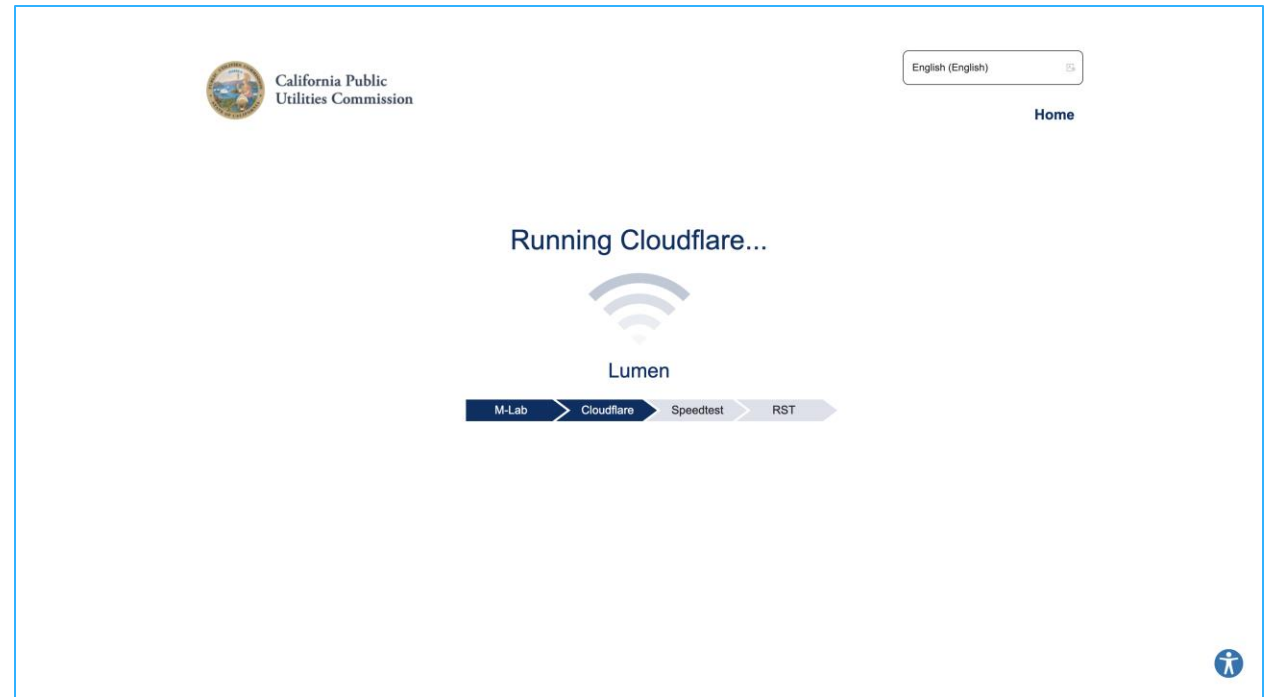
This screenshot shows the 'Before We Begin...' step of the challenge submission process. At the top left is the California Public Utilities Commission logo. At the top right, there is a language dropdown menu set to 'English (English)' and a 'Home' link. The main content area features a light blue box with the title 'Before We Begin...' and the instruction 'Hover over underlined terms for additional information.' Below this is a progress indicator with six numbered steps (1-6), where step 1 is highlighted. The question 'What is your name?' is followed by a text input field containing the placeholder 'Enter your name'. At the bottom right of the box are 'Back' and 'Next' buttons.

This screenshot shows the 'Before We Begin...' step with the attestation and agreement. The layout is similar to the previous screenshot, but the progress indicator now shows steps 1 through 5 as completed (with checkmarks) and step 6 as the current step. The text in the main content area reads: 'I understand that by submitting my results, I am authorizing my submission to be shared with units of local government and non-profits who can help improve the quality of broadband services in my area, and I further agree that government and non-profit entities participating in efforts to improve the FCC Fabric map have my permission to contact me to follow up on the information that I have submitted.' Below this text is a checked checkbox labeled 'I understand and agree'. At the bottom right are 'Back' and 'Start test' buttons. A small accessibility icon is visible in the bottom right corner of the page.

# CONSUMER CHALLENGE SUBMISSION OF SPEED TESTS

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3. Run speed test
4. Download results
5. Run two more speed tests on other days and **download** those results
6. **Submit the three speed tests** to the consumer evidence submission webpage as described in earlier slides



# EVIDENCE REQUIRED FOR INDIVIDUAL CHALLENGES

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## EVIDENTIARY STANDARDS BY CHALLENGE TYPE

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- The following slides will go over the specific types of allowable challenges and examples of acceptable evidence for BEAD challenges.
- The evidence and documentation submission is the most important part of the challenge process. If your submission does not meet the minimum level of evidence sufficient to establish a valid challenge, it will not be approved to proceed to the rebuttal phase.

# COMMON CHALLENGE TYPES

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Individuals may submit evidence for the following types of challenges:

- Availability
- Speed
- Latency
- Data cap
- Technology
- Business service only



The most common types for individuals are Availability and Speed



# AVAILABILITY CHALLENGE

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- Use this challenge if: The FCC Map shows a location as served by a provider that does not provide service to that location
- Example:
  - Your address in the Portal shows that ProviderCo provides 100/20 Mbps service to your address. However, you sent a service request to ProviderCo and were refused three months ago. You can submit an 'Availability' challenge to demonstrate to the CPUC that ProviderCo's service is not actually available at that location.
- Other situations where 'Availability' challenge is appropriate:
  - A provider failed to schedule a service installation within 10 business days of request
  - A provider requested more than a standard installation fee to connect your location





# AVAILABILITY EVIDENCE: COMMUNICATIONS WITH BROADBAND SERVICE PROVIDER

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- This can include an email, a letter, or other communications from provider that:
  - **Refuses a service request** (from the last 180 days)
  - **Fails to schedule a service installation** or fails to offer an installation date within 10 business days of request (from the last 365 days)
  - **Requests or quotes a service installation fee that's more than the standard fee** in order to connect service at the location (from the last 365 days)
- You can scan the letter or screenshot the email (making sure to include the date, time, and sender of the email)
- If you have received communications from more than a year ago, you can contact the broadband service provider again to receive a more recent response that you can submit as evidence



# AVAILABILITY EVIDENCE: SCREENSHOT

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- This evidence type refers to a screenshot of the provider webpage showing that the provider does not offer service to an address
- On most provider websites, you can enter an address into their service availability search function and they will tell you which plans are available there
- If you put an address in, and it gives you a message that '[Provider service] is not available at this address,' screenshot that webpage and submit it as a challenge
- Be sure that the screenshot includes the full address on it



# AVAILABILITY EVIDENCE REQUIREMENTS

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- **Address** provided for the location **must be found in the Fabric** dataset
- The challenged service **must meet the definition of reliable broadband** service (accessible via fiber, cable, DSL, or fixed wireless)
- Must use a **verifiable email address**
- **Scanned images must be high-quality** to permit image-to-text conversion; recommend using a scanner rather than a phone camera picture
- Screenshots should include all important information for the challenge evidence type (including the date, time, broadband service provider, web address, and residential address, as applicable)
- Must date from the specified time frame (in the last 180 or 365 days)



## CHALLENGE TYPE: SPEED



### Description

The actual speed of the service tier falls below the unserved or underserved thresholds

### Example

Speed test from customer showing the insufficient speed and meeting the requirements for speed tests

#### Provide Evidence & Documentation for your Service Speed Challenge

Please submit evidence to support your challenge. The state broadband office reserves the right to request more information at any point in the challenge process. For questions that require file upload, please compress all files over 100MB in size to a .zip file. Total file upload size is capped at 500MB.

##### 1. Speed test metadata

Please download the .csv file below and fill in the following details for each of the three speed tests taken:

- **Test method:** How the Speed Test was performed. Select from the following options:
  - Measurement from wired connection to provider gateway, ONT or fixed wireless subscriber module
  - Speed test available within the residential gateway interface
  - Speed test on providers web page
  - Speed test performed on laptop or desktop computer within immediate proximity of the residential gateway (e.g. WiFi connection in the same room as gateway)
- **Date:** Date the speed test was taken
- **Time:** Time the speed test was taken
- **IP address**
- **Download speed (in Mbps)**
- **Upload speed (in Mbps)**

[Download Speed Test CSV](#) 

\* Please reupload the completed spreadsheet as a .csv file here

Click or drag file to this area to upload  
Support for a single or bulk upload.

\* 2. Upload files for the three speed tests taken at this location, as well as evidence of the subscription speed tier (eg. a bill).

Click or drag file to this area to upload  
Support for a single or bulk upload.

\* 3. Input the median download speed across the provided speed tests in Mbps

\* 4. Input the median upload speed across the provided speed tests in Mbps

\* 5. Please provide the customer's name

\* 6. By submitting this challenge, I hereby grant access to these information elements to the Eligible Entity, any contractors supporting the challenge process, and the service provider.

# SPEED CHALLENGE

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- Use this challenge if: The speed at a location is lower than what the FCC Map shows (for download or upload or both), taking it below 100/20 Mbps
- Example:
  - The Portal shows that ProviderCo serves all the homes in your neighborhood at 100/20 Mbps, but speed tests consistently demonstrate that it is only served at 30/5 Mbps.
  - You submit speed tests for a 'Speed' challenge to reclassify the addresses from 'served' to 'underserved' (since they fall between 25/3 Mbps and 100/20 Mbps)



# SPEED EVIDENCE: SPEED TESTS

- Can be in the form of:
  - A **reading of physical line speed** from residential gateway
  - A **reading from** residential gateway **web interface or broadband service provider's web page**
  - A **speed test performed on personal computer** within immediate proximity of residential gateway **using NTIA-approved speed test application**
- Must include name, time, date, IP address, street address, certification of speed tier subscription
- Must subscribe to at least 100/20 Mbps, but it is best to be subscriber of highest-speed plan
- See [NTIA Speed Test Requirements Checklist](#) for more information

## Approved applications:

- Ookla (speedtest.net)
- M-Lab (speed.measurementlab.net)
- Cloudflare (speed.cloudflare.com)
- Netflix (fast.com)
- There will be a speed test module on the webpage used to submit individual challenges



# SPEED EVIDENCE: SPEED TESTS

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- **NTIA has set strict guidelines on speed test requirements**

Like availability challenges, the location has to be in the Fabric and meet definition of reliable broadband (accessible via fiber, cable, DSL, or fixed wireless)

- **For each address, you must submit three speed tests taken on three different days**

They can be taken anytime between 60 days before the Challenge Process and the end of the Challenge Process

- **Then, you take the median value of both the upload and the download speeds to determine the basis of the challenge**

If the median value for either upload or download qualifies as unserved (under 25/3 Mbps) or underserved (between 25/3 Mbps and 100/20 Mbps) the speed tests justify a challenge



# SPEED EVIDENCE: CALCULATING THE MEDIAN

- Median = middle value

- Example:

Three speed tests:	Three download speeds:	Three upload speeds	Median speeds for each:
103/24 Mbps 92/18 Mbps 101/17 Mbps	<b>103</b> (highest) 92 (lowest) <b>101</b> (median)	<b>24</b> (highest) <b>18</b> (median) 17 (lowest)	101 Mbps download 18 Mbps upload

- **Median download:** 101 Mbps qualifies as 'served' (over 100 Mbps) and does not qualify for a challenge
- **Median upload:** 18 Mbps qualifies as 'underserved' (under 20 Mbps) and qualifies for a challenge
- The three speed tests above justify a 'Speed' challenge to change it to 'underserved' due to the median upload speed





## CHALLENGE TYPE: DATA CAP

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### Description

The only service plans marketed to consumers impose an unreasonable capacity allowance

### Examples

- Screenshot of broadband service provider webpage
- Service description provided to customer



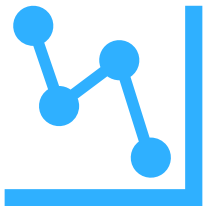
## CHALLENGE TYPE: LATENCY

### Description

Round-trip latency of broadband service exceeds 100 milliseconds

### Example

Speed test from customer showing excessive latency



## CHALLENGE TYPE: BUSINESS SERVICE ONLY

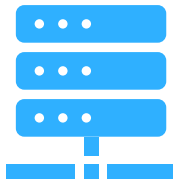
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### Description

The location is residential, but service offered is marketed or only available to businesses

### Example

Screenshot of provider webpage



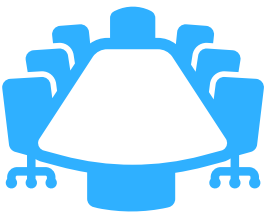
## CHALLENGE TYPE: TECHNOLOGY

### Description

The technology indicated for the location is incorrect

### Example

Manufacturer and model number of residential gateway (customer premises equipment) showing the service is delivered via a specific technology



# IMPORTANT FACTORS FOR INDIVIDUALS TO REMEMBER

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## Submitting evidence that fits with NTIA requirements:

- **Availability**
  - Evidence must be from the right timeframe (either the last 365 days or 180 days)
  - Scans and screenshots should be high resolution
  - Must include relevant information (date, time, broadband service provider, web address, and residential address)
- **Speed**
  - Three speed tests on three different days
  - Approved speed test websites (Ookla, M-Lab, Cloudflare, Netflix)
  - Speed tests taken from correct location (within immediate proximity of residential gateway)
  - All necessary information (name, date, residential address, IP address, subscription information)

**Evidence will be rejected if it does not meet requirements**

# THE CPUC IS FOCUSED ON TRANSPARENCY

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The CPUC will post all submitted challenges and rebuttals before final challenge determinations are made including:

- The unit of local or Tribal government, nonprofit or broadband service provider that submitted the challenge
- The census block group containing the challenged broadband serviceable location(s)
- The challenged party
- The type of challenge
- A summary of the challenge (including if the challenged party submitted a rebuttal)

**Note: CPUC will not post any personally identifiable information about individuals providing evidence**

# NEXT STEPS

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## WHAT YOU CAN DO NEXT

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- Check the reported speeds and availability for your addresses, including your home or small business, in the evidence submission website
- Take speed tests at areas with slower-than-promised internet and submit them through the challenge evidence submission website
- Submit other evidence, including evidence a provider has refused service to an address, not scheduled installation, or quoted too much for installation

# THANK YOU!

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