

Broadband Navigator™ User Guide

Michigan Department of Labor and Economic
Opportunity (LEO) High-Speed Internet Office
(MIHI)



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Broadband Navigator™ User Guide

Welcome to the Broadband Navigator™ User Guide. This guide is designed to help you navigate the application for managing the BEAD State Challenge process.

Overview

According to the National Telecommunications and Information Administration’s (NTIA) Broadband, Equity, Access, and Deployment (BEAD) Program Guidance, each State Broadband Office needs to implement a State Challenge Process Portal as part of their State Challenge Process. This portal will provide the tools and capabilities to allow Local Governments, Internet Service Providers (ISPs), and Nonprofits to view and challenge the broadband coverage determinations (served, underserved, unserved) for each broadband serviceable location (BSL).

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 states 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, Broadband Offices can manage the complete lifecycle of a BEAD challenge through inception, review of evidence, rebuttal, adjudication, and final determination.

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 [Public Evidence Submission](#) section below.

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 and Tribal Governments
2. Nonprofit Organizations
3. Internet Service Providers (ISPs)

Types of Challenges

Challenge	Description
Availability – Service Is Not Available	The broadband service identified is not offered at the location, including a unit of a multiple dwelling unit (MDU).
Availability – Service Is Available	The location can identify qualifying broadband. (This challenge type should not be used for CAI Locations; see CAI: Qualifying broadband available challenge type below for CAI Locations.)
Speed	The actual speed of the service tier falls below the unserved or underserved thresholds.
Latency	The round-trip latency of the broadband service exceeds 100 ms.

Data Cap	The only service plans marketed to consumers impose an unreasonable capacity allowance (“data cap”) on the consumer.
Technology	The technology indicated for this location is not offered.
Business Service Only	The location is residential, but the service offered is marketed or available only to businesses.
Enforceable Commitment	The challenger has knowledge that broadband will be deployed at this location by the date established in the deployment obligation.
Planned Service	For all wired and licensed fixed wireless technologies: The challenger has knowledge that broadband will be deployed at this location by June 30, 2024, without an enforceable commitment or a provider is building out broadband offering performance beyond the requirements of an enforceable commitment. For end-to-end fiber networks delivering a minimum of 1/1 Gbps: The challenger has knowledge that broadband will be deployed at this location by December 31, 2024, without an enforceable commitment or a provider is building out broadband offering performance beyond the requirements of an enforceable commitment. MIHI has established a longer planned service period for end-to-end fiber networks due to the typically longer deployment schedules for fiber networks and Michigan’s seasonally shortened construction season. Additionally, MIHI is prioritizing end-to-end fiber deployment in the BEAD Subgrantee Selection process and extending the planned service deadline for end-to-end fiber aligns with that prioritization.
Not part of enforceable commitment.	This location is in an area that is subject to an enforceable commitment to less than 100% of locations and the location is not covered by that commitment. (See BEAD NOFO at 36, n. 52.)
Location is a CAI	The location should be classified as a CAI.
Location is not a CAI	The location is currently labeled as a CAI but is a residence, a non-CAI business, or is no longer in operation.
CAI: Qualifying broadband unavailable.	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 alike and (ii) latency less than or equal to 100 milliseconds.” NOFO, p. 37.)
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 alike and (ii) latency less than or equal to 100 milliseconds.” NOFO, p. 37.)

Challenge Process Phases Overview

Publication of Eligible Locations

Prior to the Challenge Phase kickoff, the Broadband Office will publish the final set of locations eligible for BEAD funding. This dataset will consist of ‘unserved’ and ‘underserved’ locations outside of existing federal or state funded areas. Additionally, the office will publish locations that are served, 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.

Challenge Phase

During this phase, eligible challengers may submit challenges through the challenge portal. Challenges must include evidentiary support of each challenge based on the evidence documentation provided in the state's BEAD Initial Proposal Volume I. A detailed summary of acceptable evidence types is included in the [Appendix](#).

Once evidence is submitted, the challenge will appear in the Navigator evidence review dashboard. Each challenge has its own activity log, which enables the Broadband Office to audit any challenge. From the dashboard, the Broadband Office or their designees can examine the provided evidence and accept or reject it based on the guidelines of the BEAD Challenge Process. If the challenge meets the requirements, it will be updated in the portal as 'Challenged' and will be visible to the provider whose service availability and performance is being contested.

The portal will also notify the provider of the challenge through an automated email. The email will contain important timing information on the specific challenge, alerting the rebutters or challenge reviewers 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.

Rebuttal Phase

Each challenge will have a limited length of time to be rebutted. This length of time is specified in the BEAD Initial Proposal Volume I and begins at the time of challenge evidence approval. At the end of the Challenge Phase, an official Rebuttal Phase will begin. This phase serves as a buffer and ensures all challenges submitted at the end of the Challenge Phase have ample time to be rebutted.

Service Level Challenge Rebuttals

Challenges related to service level (availability, speed/latency, data cap, technology, planned service, and business service only) will be posted in the dashboard of the associated ISP. The ISP will also be notified by email as each challenge is moved to the Rebuttal Phase. Challenges 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 (enforceable commitment, not part of an 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 of specific challenges but instead will be notified when the rebuttal phase begins. 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 the Broadband Office 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.

Final Determination Phase

At the end of the Rebuttal Phase, an official Final Determination Phase will begin. 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. The final determinations will occur on a rolling basis for provider specific challenges, and during a state-specified timeframe for those published in the Open Rebuttals list. This length of time is specified in the BEAD Initial Proposal Volume I. During the Final Determination Phase the Broadband Office will classify a challenge as ‘sustained’ or ‘rejected.’

Navigator Walkthrough

Public-Facing Mapping Functionality

The BEAD Challenge Navigator features full-screen map viewing with a clean design and intuitive tools and workflows. The following items encompass the core functionality of the public-facing component of the BEAD Challenge Navigator.

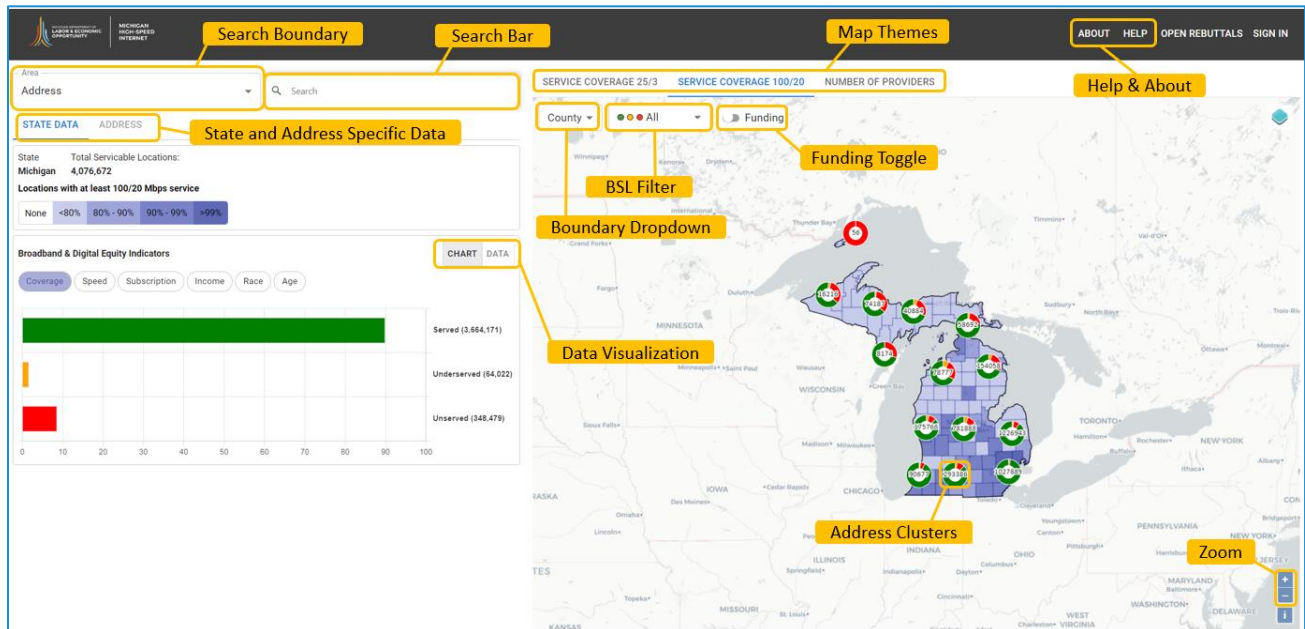


Image 1: Overview of the Broadband Map with labelled features. This image can be used as a reference alongside other images in the document.

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

View Broadband Data Coverage / Availability Map: At first glance, users will be presented with the Broadband Availability Map showing the total number of BSLs in the area and their proportion of Unserved, Underserved, and Served status.

[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.

[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.

[Select levels of geography](#): By selecting the boundary dropdown, users can choose to view area boundaries and data by various geographic areas.

[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.

[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.

The screenshot shows a web interface with a search bar and a dropdown menu. The search bar contains the text "mi". The dropdown menu is open, showing two options: "Midland County" and "Missaukee County". Below the search bar, there are two tabs: "STATE DATA" (selected) and "ADDRESS". Under the "STATE DATA" tab, there is a table with the following data:

State	Total Servicable Location
Michigan	4,076,672

Image 1.2: 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 allows users to see details about the broadband service and funding at that location.

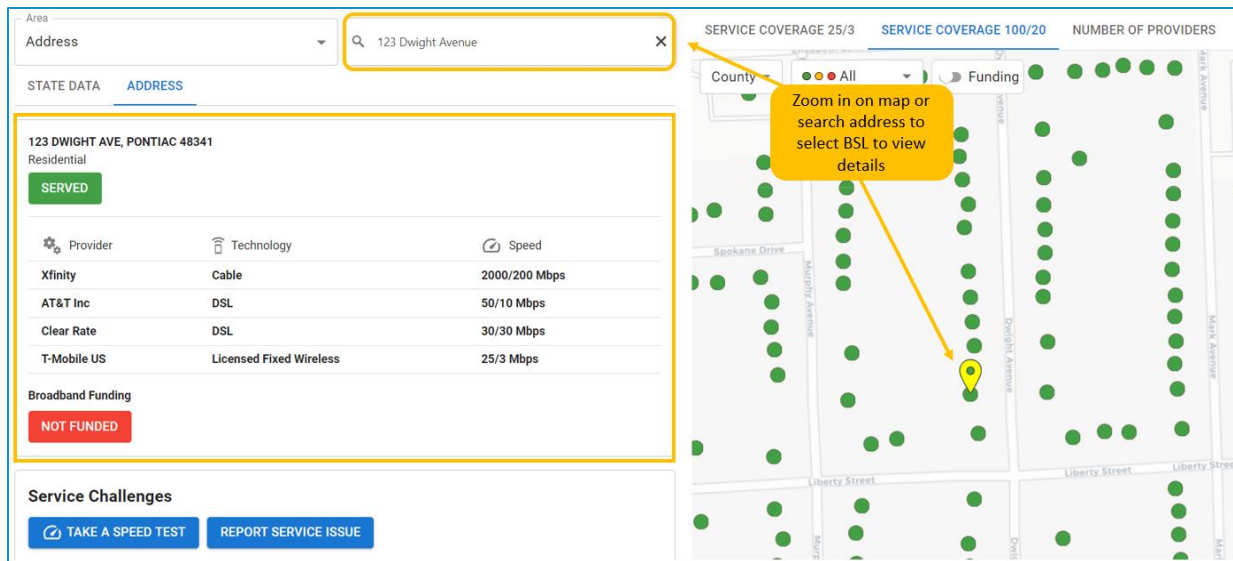


Image 1.3: Address search and selection view showing broadband service and funding at the location.

[Toggle Served / Underserved / Unserved](#): Users can view or hide all, Served, Underserved, and Unserved BSL as a count when zoomed out, or specific points when zoomed in.

[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 streetmap or aerial imagery as the underlying basemap.

Public Evidence Submission

Public users can select a BSL and submit evidence that could substantiate a challenge (including speed tests). 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.

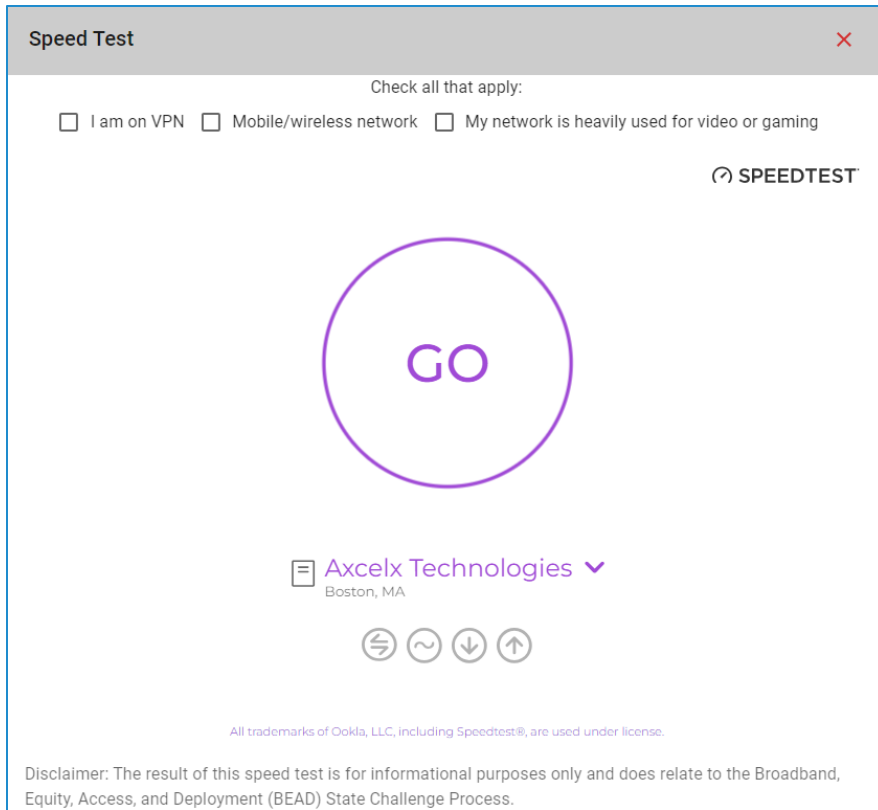


Image 1.4: Take a Speed Test

Submitting problems with service

Service issue evidence submission is available to the public. Members of the public may submit evidence documenting issues with Availability, Data Cap, and Business Service Only. Once the evidence submission type is selected, users will be prompted to answer questions pertaining to their provider, property type, and contact information before the opportunity to upload PDF(s) of evidence before submitting the problem for review by a State Broadband Office.

Account Registration

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.'

Log in to your account

Email address

email address

Password

password

[Forgot password?](#)

LOG IN

[Request a new account](#)

Image 2: 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. *Email address
 - II. *Full name
 - III. *Category (select from dropdown)
 - IV. *Organization
 - i. Nonprofits and Local Governments: 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 Providers: 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.
 - V. *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.

Manage Users (Broadband Office Only):

The Broadband Office will be given access to the Manage Users dashboard where they can invite, manage, and view pending and approved users. To access the Manage Users dashboard, log in to your Broadband Office account, select the icon in the top right of the application, and click on Manage Users.

User Requests and Management

The Broadband Office admin users can view and manage requests using the Manage Users dashboard. In the Requests section, admin users can accept or reject account registration requests.

Name	Organization	Webpage	Email	Request Date	Days pending	Actions
Mark Grinberg	Test Local Gov	http://sanborn.com	mark1332@mailinator.com	Mar 11, 2024, 12:58:12 PM	4	
Caitlyn Severy	My Organization	sanborn.com	caitlyn@mailinator.com	Mar 13, 2024, 2:04:15 PM	2	

Image: Pending user requests

Admin users may also view all registered users and edit, lock, or delete the accounts in the Users section.

User Id	User name	Organization	Role	Recent Login	Actions
2	Test local_gov User	Test Local Gov	user	Mar 13, 2024, 2:08:58 PM	
3	Test nonprofit User	Test Nonprofit	user	Mar 13, 2024, 11:33:16 AM	
4	Caitlyn Severy	Xfinity	user	Mar 14, 2024, 1:03:15 PM	
5	Test broadband_office User	Test Broadband Office	admin	Mar 14, 2024, 3:49:11 PM	
6	Test nonprofit User	Test Nonprofit Pass Thru	user	Mar 14, 2024, 11:08:54 AM	

Image: Manage users

Invite a new User:

Admin users can invite new users to the application via an interface that is the same as the 'Request an Account' interface. These user accounts are automatically approved.



Image 3: Invite a user

1. Fill out user information
 - I. * Full Name
 - II. * Email Address
 - III. * Role
 - i. User
 - ii. Admin
 - IV. * Category
 - i. Unit of Local Government
 - ii. Non-Profit Organization
 - iii. Broadband Provider
 - iv. Broadband Office
 - V. * Organization
 - i. Inviting Non-Profit Organization and Local Governments:
 1. Select 'Non-Profit Organization' or 'Unit of Local Government' from the Organization Category dropdown menu.

2. If multiple users from the same organization are accessing the portal, please ensure that the same organization name is used for all users. This will ensure access to challenge review dashboards.
 3. If the Organization Name is not listed, select 'Other' at the bottom of the list and manually type the name.
- ii. Inviting Broadband Providers:
1. Select 'Broadband Provider' from the Organization Category dropdown menu.
 2. Please find and select the organization name from the auto populated list. This is critical to ensure challenges will be linked to correct account and will be appropriately notified.
 3. If the Organization Name is not listed, select 'Other' at the bottom of the list and manually type the name.
- iii. Inviting Broadband Offices:
1. Select 'Broadband Office' from the Organization Category dropdown menu.

Submitting Challenges

The screenshot displays the application interface for submitting challenges. On the left, there is a search bar with the address '123 Dwight Avenue' entered. Below the search bar, the address details are shown: '123 DWIGHT AVE, PONTIAC 48341', 'Residential', and 'SERVED'. A table lists available providers, technologies, and speeds:

Provider	Technology	Speed
Xfinity	Cable	2000/200 Mbps
AT&T Inc	DSL	50/10 Mbps
Clear Rate	DSL	30/30 Mbps
T-Mobile US	Licensed Fixed Wireless	25/3 Mbps

Below the table, the 'Broadband Funding' status is shown as 'NOT FUNDED'. At the bottom, there is a 'Service Challenges' section with two buttons: 'TAKE A SPEED TEST' and 'REPORT SERVICE ISSUE'. On the right, a map shows the location of the address, with a yellow callout box pointing to a specific location on the map: 'Zoom in on map or search address to select BSL to challenge'. The map also displays service coverage statistics: 'SERVICE COVERAGE 25/3', 'SERVICE COVERAGE 100/20', and 'NUMBER OF PROVIDERS'.

Image 4: 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 'Service Challenges' 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
 - ii. Speed
 - iii. Latency
 - iv. Data Cap
 - v. Technology
 - vi. Business Service Only
 - vii. Enforceable Commitment
 - viii. Not part of an enforceable Commitment
 - ix. Planned Service
 - x. Location is a Community Anchor Organization
 - xi. Location is not a Community Anchor Organization

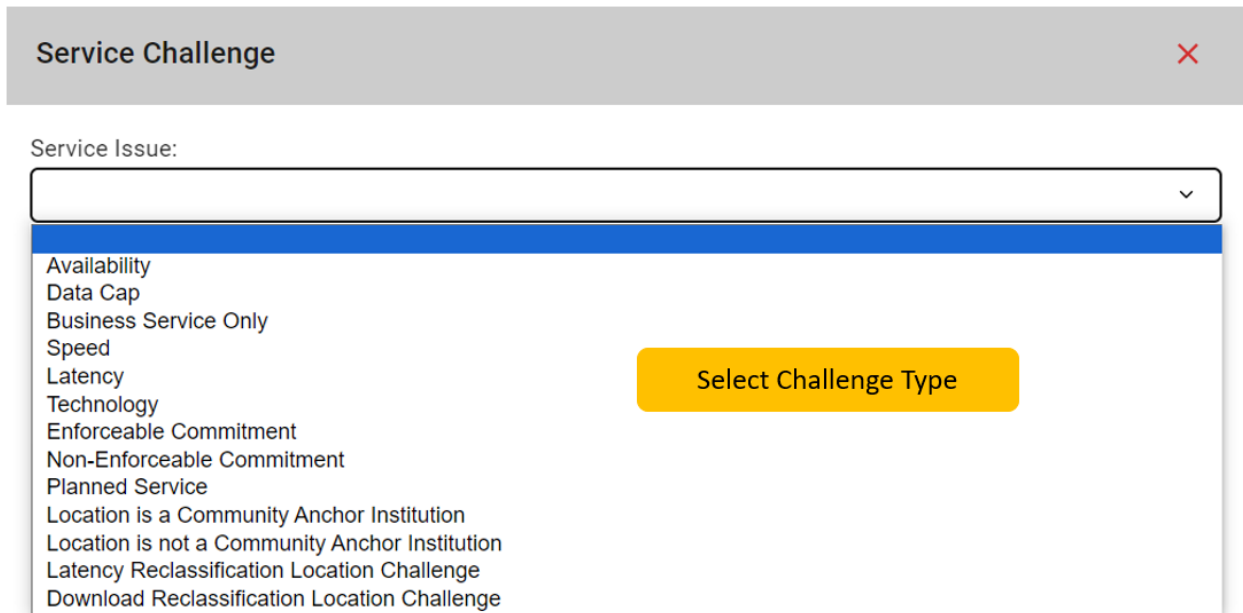


Image 5: Service challenge type dropdown

6. Once you choose the correct challenge type for the location, the application will prompt you to submit evidence.

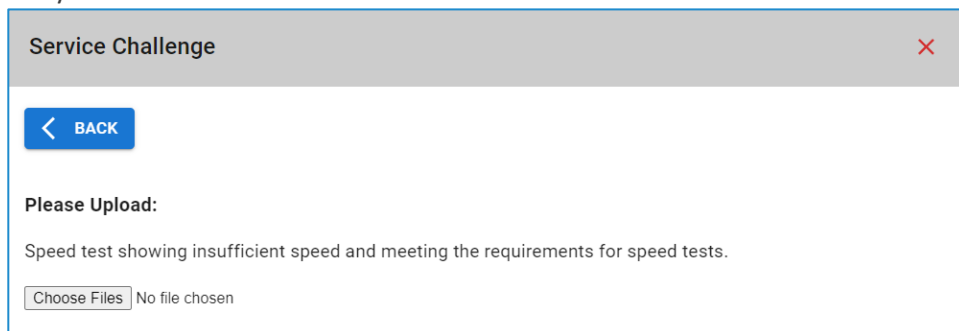


Image 6: Challenge evidence upload

- i. Required evidence for your challenge type will be listed on the 'Evidence Submission' page.
 - ii. Select 'Choose Files' to add the required evidence.
 - ii. All evidence must be in PDF format.
 - ii. You may upload up to 5 files under 5MB each.
 - ii. If the incorrect evidence is attached by mistake, use the red 'X' to remove the attachment.

Note: Visit the [Adobe PDF Converter](#) to easily convert common file types to a PDF format for submission.
 - iii. 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 challenge type, the challenge will be rejected.
7. The 'Submit Challenge' page will prompt you to complete the challenge:
 - i. Depending on your challenge type, you will be required to answer questions to support your challenge.
 - ii. Select the accurate 'Property Type' in the drop-down. You will have the option to choose from Residential, Business, or Other.
8. Review the 'Certification of Individual or Certifying Official' and 'Privacy Act Statement'. If all information is accurate and lawful, select the 'Submit' button on the bottom right to complete your challenge.
9. The challenge will automatically be forwarded to your Broadband Office for review.

Bulk Challenges

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. Select 'Choose Files' to upload PDF evidence. Once complete, click 'Next'.
 - i. Evidence must be in PDF 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.

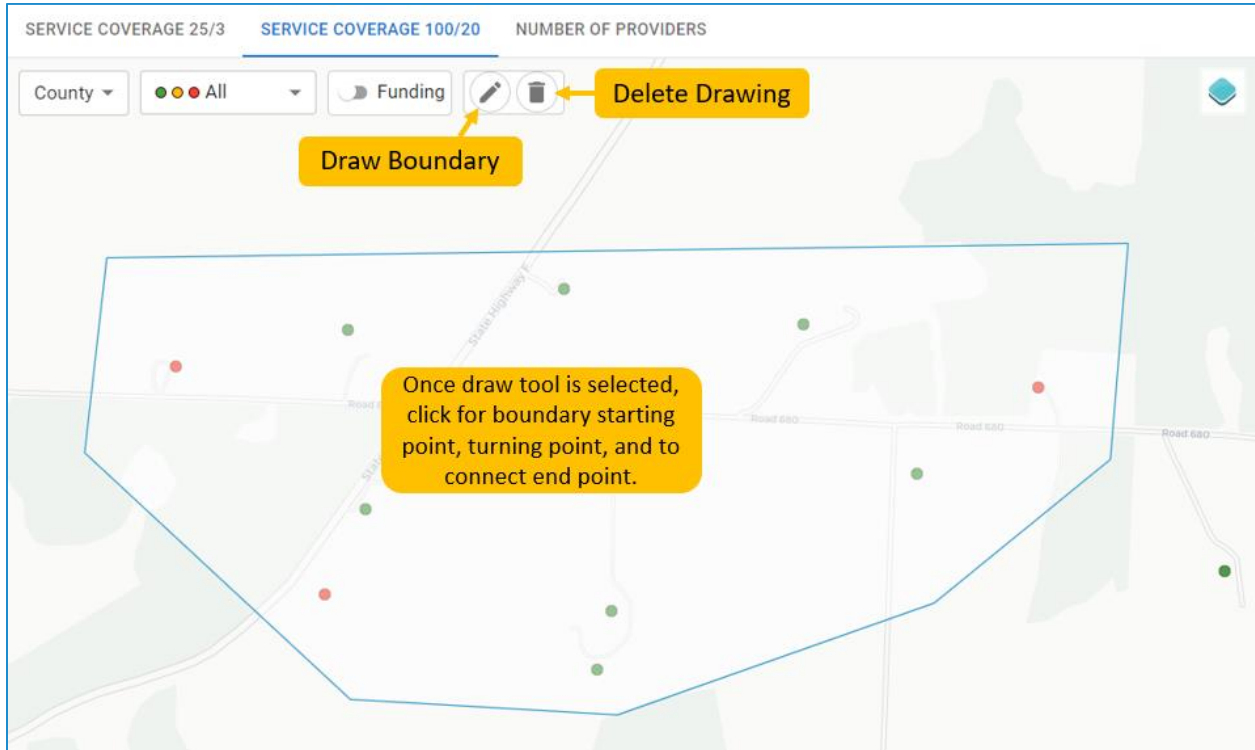


Image 7: Bulk area challenge

Review Challenges

Challenges can be viewed and managed in the Challenge Dashboard. From the dashboard, Broadband Offices or their designees can examine the provided evidence and accept or reject it based on their guidelines of the BEAD Challenge Process. Local Government / Non-Profit.

Each challenge has its own activity log, which enables the audit of any challenge. Furthermore, each challenge can be assigned to allow for multiple individuals working on a stream of challenges concurrently. Challenges can be commented on, so that any questions or concerns about a particular challenge can be captured throughout the process. Comments are only visible within an organization. Individuals from other organizations including the Broadband Office cannot see comments left by individuals from other organizations. For example, if several individuals are working on behalf of an internet service provider to rebut challenges, their comments are only visible by other providers within that internet service provider's authenticated users.

Non-Profits and Local Governments

The 'My Challenges' queue allows local 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, the broadband office 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 the Broadband Office will also fall into the 'Completed' queue.

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

The designated Pass-Through organization is responsible for reviewing submissions by public users in the 'Evidence Review' section of the dashboard. If accepted, this will generate a challenge in the Broadband Office'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 the Broadband Office 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 the State's threshold for multiple BSLs in an area has been met to qualify for an area challenge. If so, the individual challenges are subsumed by the area challenges, and the individual challenges complete and the area challenge takes the place of the individual challenges. There are more robust evidence requirements for rebuttal of 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.

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.

Rebutting the Challenge

Immediately following the acceptance of a challenge, the rebuttal period begins. Rebutting parties will be notified at the start of the rebuttal phase via email (if they have registered in the portal). These challenges will be accessible in the dashboard for review and rebuttal by challengers. The directions to rebut are based on organization type:

ISPs: 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 three sections:
 - I. Created Challenges
 - II. Awaiting Rebuttal
 - III. Completed
4. All Availability – Service Is Not Available, 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. Provider
 - V. Challenge ID
 - VI. Challenge Type
 - VII. Submitted Date
 - VIII. Evidence
5. Select the challenge from the list or use the search bar to find a specific challenge.
 - 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.
6. The selected challenge and associated evidence 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'.
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 format.
 - ii. You may upload up to 5 files under 5MB each.
 - iii. If the incorrect evidence is attached by mistake, use the red 'X' to remove the attachment.
Note: Visit the [Adobe PDF Converter](#) to easily convert common file types to a PDF format for submission.
 - 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. Your challenge status will now be listed as 'Pending'.

All Users: Availability – Service Is Available/ Enforceable Commitment/ Non-Enforceable Commitment/ Planned Service/ Location is a Community Anchor Institution/ Location is not a Community Anchor Institution

CHALLENGER	CHALLENGE STATUS	CHALLENGE ID	CHALLENGE TYPE	SUBMITTED DATE	ACTIONS	
1359 N COLLEGE RD BLDG 2, MASON, MI 48854	Test Broadband Office	Unknown	248	Enforceable Commitment	02/13/2024	REBUT
12676 RETREAT DR, GRAND HAVEN, MI 49417	Test Broadband Office	Unknown	335	Enforceable Commitment	02/24/2024	REBUT

Image 8: 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.
 - 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 format.
 - ii. You may upload up to 5 files under 5MB each.
 - iii. If the incorrect evidence is attached by mistake, use the red 'X' to remove the attachment.
Note: Visit the [Adobe PDF Converter](#) to easily convert common file types to a PDF format for submission.
 - 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, Broadband Offices and their designees 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.

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 BEAD Initial Proposal Volume I and in the Appendix of this document. Follow these guidelines 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.

Conclusion

Thank you for taking part in the State BEAD Challenge Process. Your support is a critical part of the path towards broadband 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 the Michigan High Speed Internet Office. leo-mihighspeedinternet@michigan.gov

Keep updated on the BEAD Challenge process by visiting your state's site for more information!

Appendix

Acceptable Challenge Evidence

Availability – Service Is Not Available Challenge Evidence – Code A

Type	Challenge Reason	Acceptable Evidence (maximum days from evidence collection)
1	Provider failed to schedule a service installation within 10 business days of a request.	<ul style="list-style-type: none"> Text message, email, or letter from provider (60 days) Voicemail transcript from provider (60 days) Documentation of phone call or in-person interaction (60 days) Other types of evidence (60 days)
2	Provider did not install the service at the agreed-upon time.	<ul style="list-style-type: none"> Text message, email, or letter from provider (60 days) Voicemail transcript from provider (60 days) Documentation of phone call or in-person interaction (60 days) Other types of evidence (60 days)
3	Provider requested more than the standard installation fee to connect the location.	<ul style="list-style-type: none"> Text message, email, or letter from provider (365 days) Other types of evidence (365 days)
4	Provider denied the request for service.	<ul style="list-style-type: none"> Screenshot from provider website (60 days) Text message, email, or letter from provider (60 days) Voicemail transcript from provider (60 days) Documentation of phone call or in-person interaction (60 days) Other types of evidence (60 days)
5	Provider does not offer the technology entered above at this location.	<ul style="list-style-type: none"> Screenshot from provider website (60 days) Text message, email, or letter from provider (60 days) Voicemail transcript from provider (60 days) Documentation of phone call or in-person interaction (60 days) Other types of evidence (60 days)
6	Provider does not offer the speed(s) shown on the Broadband Map for purchase at this location.	<ul style="list-style-type: none"> Screenshot from provider website (60 days) Text message, email, or letter from provider (60 days) Voicemail transcript from provider (60 days) Documentation of phone call or in-person interaction (60 days) Other types of evidence (60 days)
7	No wireless signal is available at this location (only for technology codes 71 and 72) ⁹ .	<ul style="list-style-type: none"> Infrastructure related evidence (180 days) Screenshot from provider website (60 days) Text message, email, or letter from provider (60 days) Voicemail transcript from provider (60 days) Documentation of phone call or in-person interaction (60 days) Other types of evidence (180 days)
8	New, non-standard equipment had to be constructed at this location.	<ul style="list-style-type: none"> Infrastructure related evidence (180 days) Text message, email, or letter from provider (365 days) Voicemail transcript from provider (60 days) Documentation of phone call or in-person interaction (60 days) Other types of evidence (365 days)

Additionally, other evidence for availability may be submitted. Acceptance or rejection of the challenge evidence will be at the discretion of the MIHI office.

Availability – Service Is Available Evidence – Code A

These challenges may be submitted for BSL(s). (Similar challenges for CAI Locations may be submitted as Challenge Type CAI: Qualifying Broadband Available – Code Q.) The MIHI Office may accept the following evidence for these challenges :

- A copy of the customer bill that shows that the location subscribes or has subscribed to the providers service (365 days).
- A screenshot from the provider website that shows service availability at that location (365 days).
- A copy of an offer sent to the location that provides service is now available as a standard installation (365 days).
- Geospatial, as-built diagrams or files of infrastructure deployed to provide service to the location (365 days).
- For fixed wireless service, results from a mobile test unit that demonstrate service availability and speed at the challenged location (365 days).

Additionally, other evidence for availability may be submitted. Acceptance or rejection of the challenge evidence will be at the discretion of the MIHI office.

All evidence for Availability – Service Is Available challenges must clearly show which BSL(s) it applies to and indicate:

- The type of technology that is available, and
- The download speeds, upload speeds, and latency that are available.

Speed Test Challenge Evidence – Code S

The Michigan High-Speed Internet Office will accept speed tests as evidence for substantiating challenges and rebuttals. Speed tests cannot predate the beginning of the challenge period by more than 60 calendar days.

Speed Challenges must provide evidence that the download/upload speeds of the broadband service are materially lower than 100/20 Mbps. This will require multiple speed tests by the subscriber at each challenged location. Each speed challenge must consist of three measurements, taken on different days. The measurements do not need to occur on consecutive days. The median of the three tests is used to trigger the challenge.

Requirement	Required Content
Acceptable speed test forms	<ul style="list-style-type: none"> • A reading of the physical line speed provided by the residential gateway: i.e., DSL modem, cable modem (for HFC), ONT (for FTTH), or fixed wireless subscriber module. • A reading of the speed test available from within the residential gateway web interface. • A reading of the speed test found on the service provider’s web page. • A speed test performed on a laptop or desktop computer within immediate proximity of the residential gateway, using a commonly used speed test application. Mobile devices cannot be used to gather speed test data.
Speed test measurement requirements	<ul style="list-style-type: none"> • The three tests must be conducted on three different days; the days do not have to be adjacent. • The test results must display the time and date of each speed test conducted. • The test results must include the download and upload speed results.

	<ul style="list-style-type: none"> The median (middle value) of the three tests (i.e., the second highest (or second lowest) speed) is used to trigger a speed-based (S) challenge, for either upload or download speeds. The provider-assigned internet protocol (IP) address, either version 4 or version 6, identifying the residential gateway conducting the test.
Additional information requirements	<ul style="list-style-type: none"> The name and street address of the customer conducting the speed test. A certification of the speed tier the customer subscribes to. Speed tests must be accompanied by a certified attestation from the customer that states the following: <ul style="list-style-type: none"> “I hereby certify, under penalty of perjury, that the download and upload speed indicated in this submission are the true and correct speeds to which I subscribe at the location where the speed tests included in this submission were measured. The entry of my name above constitutes my electronic signature to this certification. Persons making willful false statements in this form can be punished by fine or imprisonment under 18 U.S.C. § 1001.” A copy of the customer’s latest internet bill would also provide certification of the speed tier to which the customer subscribes. A consent that grants the non-profit organization or local unit of government submitting the challenge on behalf of an individual (the Challenger), the MIHI Office, any contractors supporting the challenge process, and the service provider being challenged access to the information provided in the challenge.
Submission requirements	<ul style="list-style-type: none"> Speed tests may be conducted by subscribers, but speed test challenges must be gathered and submitted by units of local government, nonprofit organizations, or a broadband service provider. Subscribers submitting a speed test must indicate the speed tier they are subscribing to. <p><i>Note: If a particular service offering does not meet the advertised speed threshold, but is not the only service offering at that location, the eligibility status of the location may not change. For example, if a location is served by 100/20 Mbps licensed fixed wireless and 500/300 Mbps fiber, conducting a speed test on the fixed wireless network that shows a median speed of 70/10 Mbps does not change the status of the location from served to underserved because of the availability of 500/300 Mbps fiber.</i></p>

Additionally, other evidence for Speed challenges may be submitted to show sufficient speed. Acceptance or rejection of the challenge evidence will be at the discretion of the MIHI office.

Latency Challenge Evidence – Code L

The challenge for Latency requires similar evidence and process as the Speed Challenge above. MIHI requires a speed test by subscriber, showing the excessive latency. Speed tests cannot predate the beginning of the challenge period by more than 60 calendar days.

Latency challenges must provide evidence that the round-trip latency of the broadband service exceeds 100ms for any service subscription tier. This will require multiple speed tests by the subscriber at each challenged location, showing the excessive round-trip latency. The measurements do not need to occur on consecutive days. The median of the three tests is used to trigger the challenge

Requirement	Required Content
Acceptable speed test forms	<ul style="list-style-type: none"> A reading of the physical line speed provided by the residential gateway: i.e., DSL modem, cable modem (for HFC), ONT (for FTTH), or fixed wireless subscriber module. A reading of the speed test available from within the residential gateway web interface. A reading of the speed test found on the service provider’s web page. A speed test performed on a laptop or desktop computer within immediate proximity of the residential gateway, using a commonly used speed test application.
Speed test measurement requirements	<ul style="list-style-type: none"> The three tests must be conducted on three different days; the days do not have to be adjacent.

	<ul style="list-style-type: none"> • The test results must include the time and date of each speed test conducted. • The test result must include the latency results. • The median (middle value) of the three tests (i.e., the second highest (or second lowest) for round-trip latency) is used to trigger a latency-based (L) challenge, for either upload latency or download latency. • The provider-assigned internet protocol (IP) address, either version 4 or version 6, identifying the residential gateway conducting the test.
Additional information requirements	<ul style="list-style-type: none"> • The name and street address of the customer conducting the speed test. • A certification of the speed tier the customer subscribes to. Speed tests must be accompanied by a certified attestation from the customer that states the following: <ul style="list-style-type: none"> • “I hereby certify, under penalty of perjury, that the download and upload speed indicated in this submission are the true and correct speeds to which I subscribe at the location where the speed tests included in this submission were measured. The entry of my name above constitutes my electronic signature to this certification. Persons making willful false statements in this form can be punished by fine or imprisonment under 18 U.S.C. § 1001.” • A copy of the customer’s latest internet bill would also provide certification of the speed tier to which the customer subscribes. • A consent that grants the non-profit organization or local unit of government submitting the challenge on behalf of an individual (the Challenger), the MIHI Office, any contractors supporting the challenge process, and the service provider being challenged access to the information provided in the challenge.
Submission requirements	<ul style="list-style-type: none"> • Speed tests may be conducted by subscribers, but latency challenges must be gathered and submitted by units of local government, nonprofit organizations, or a broadband service provider. • Subscribers submitting a speed test must indicate the speed tier they are subscribing to.

Additionally, other evidence for latency challenges may be submitted to show the round-trip latency of the broadband service exceeds 100ms for any service subscription tier. Acceptance or rejection of the challenge evidence will be at the discretion of the MIHI office.

Data Cap Challenge Evidence – Code D

A Data Cap Challenge refers to service plans marketed by providers to customers that impose an unreasonable capacity allowance on data usage. An unreasonable capacity allowance is defined as a data cap that falls below the monthly capacity allowance of 600 GB as listed in the FCC 2023 Urban Rate Survey¹⁰. Screenshot from provider website. MIHI will accept any of the following forms of evidence that indicates a monthly data cap of less than 600 GB has been imposed on a customer:

- Text message, email, or letter from the provider.
- Voicemail transcript from provider.
- Documentation of phone call or in-person interaction.
- Terms of Service or Service Description
- End-User contract or offer.
- Other evidence to demonstrate that an unreasonable capacity allowance on data usage has been on imposed on a customer.

Technology Challenge Evidence – Code T

The technology challenge is triggered when the provider for a specific BSL does not provide the same technology as the one identified in the portal, therefore the technology indicated for this location is not offered. The evidence cannot predate the beginning of the challenge period by more than 180 calendar days:

- Infrastructure knowledge/evidence, including manufacturer and model number of residential gateway (CPE) that demonstrates the service is delivered via a specific technology.
- Screenshot from provider website showing the type of technology use for the specific location.
- Text message, email, or letter from the provider.
- Voicemail transcript from provider.
- Documentation of phone call or in-person interaction.
- Terms of Service or Service Description.
- End-User contract or offer.
- Other evidence to demonstrate that the type of technology indicated for a selected location is not available.

Business Service Only Challenge Evidence – Code B

The business only challenge is triggered when the BSL is residential, but the service offered at that location is marketed or available only to businesses. The MIHI Office may accept any of the following forms of evidence that indicates the **only** service offered at that BSL is for businesses only. The evidence cannot predate the beginning of the challenge period by more than 180 calendar days:

- Screenshots from the FCC BDC dataset that shows the provider only reporting to serve businesses for challenged locations.
- Screenshot from provider website showing the type of service available for the specific location.
- Text message, email, or letter from the provider.
- Voicemail transcript from provider.
- Documentation of phone call or in-person interaction.
- Terms of Service or Service Description.
- End-User contract or offer.
- Other evidence to demonstrate that challenged location has business only type of service.

Enforceable Commitment Challenge Evidence – Code E

As part of the deduplication process, MIHI is required to identify all BSLs that already were awarded funding through federal, state, and local broadband grant programs. The deduplication process applies to programs that require broadband providers to offer services with speeds of at least 100/20 Mbps. The Enforceable Commitment Challenge allows qualified organizations to prove that a location previously lacking these services, now has a commitment (funding through a grant) for the required infrastructure deployment and service.

The MIHI Office may accept evidence that indicates the challenged BSLs already has a funded commitment for infrastructure and service. The evidence must include **all** the following information:

- Authorization letter and/or executed agreement with funding entity that includes:
 - Required download and upload speeds in Mbps for deployment.
 - Technology used for deployment.
 - List of funded locations and if available methodology used to match awarded locations to Fabric IDs.
- An attestation from the service provider that confirms that the round-trip latency of service will be under 100ms. An attestation from the service provider that confirms the planned network will be fully deployed to the challenged locations by the dates required in the award agreement.
- Type of service to be made available: residential service, business service, or both.

- If the challenge includes locations on Tribal Lands, the challenger will need to attach a legally binding agreement between the relevant Tribal Government and the service provider for the location(s) at issue.

In addition to the above, other types of evidence may also be submitted that demonstrate a location is already committed to funding through a grant.

Not Part of Enforceable Commitment Challenge Evidence – Code N

The Not Part of Enforceable Commitment Challenge allows challengers to provide evidence that a location is not or no longer covered by an Enforceable Commitment, as indicated by MIHI as part of the deduplication process and displayed on the challenge portal map.

The MIHI Office may accept any of the following as evidence for this challenge type:

- Declaration by service provider subject to the enforceable commitment that they are no longer capable of meeting their commitments.
- Documentation that the provider has defaulted on the commitment or is otherwise unable to meet their grant commitments. This may include:
 - Public notice of default published by the funding agency.
 - Copy of the default notice sent to the provider.
- Documentation that less than 100% of locations in the area subject to the enforceable commitment are covered by that commitment.
- If locations are on Tribal lands, the Tribal Government may challenge based on a failure of the provider to obtain consent from the Tribal Council for the application and/or receiving the award.
- Other Types of Evidence that demonstrates a location is no longer covered by an Enforceable Commitment.

Planned Service Challenge Evidence – Code P

The Planned Service Challenge will be triggered if a provider has or plans to deploy infrastructure and service to the challenged locations based on the following requirements:

For all wired and licensed fixed wireless technologies: The challenger plans to deploy or has knowledge that broadband will be deployed at challenged location by June 30, 2024, without an enforceable commitment and offering performance beyond the requirements of an enforceable commitment.

For end-to-end fiber networks delivering a minimum of 1/1 Gbps: The challenger plans to deploy or has knowledge that broadband will be deployed at challenged location by December 31, 2024, without an enforceable commitment or offering performance beyond the requirements of an enforceable commitment.

The MIHI Office may accept evidence that indicates service is planned for the challenged BSLs. The evidence must include **all** the following documentation:

- Construction contracts or similar evidence of on-going deployment, along with evidence that all necessary permits have been applied for and/or obtained.

- Information related to the Planned Service such as:
 - Required download and upload speeds in Mbps for deployment.
 - Technology used for deployment.
 - List of locations and if available methodology used to match awarded locations to Fabric IDs.
- An attestation from the service provider to confirm the following:
 - Round-trip latency of service will be under 100ms.
 - Service will be deployed to the challenged locations by the timeframe set above with the described technology, speeds, and latency parameters.
- Other evidence that the deployment is progressing as planned to meet the deadlines listed above, which should at least include:
 - Planned network diagrams.
 - Copies of construction contracts and invoices.
- A legally binding affidavit from the provider committing that planned service will meet the BEAD definition and requirements of reliable and qualifying broadband even if not required by its funding source (i.e., a separate federal grant program), including the expected date deployment will be completed, which must be on or before June 30, 2024, or December 31, 2024, depending on the service speed and technology type. It should be noted that providers that fail to meet commitments for eligible service by the provided dates will not be eligible to be a BEAD subgrantee.
- If the challenge includes locations on Tribal Lands, challenger will need to attach a legally binding agreement between the relevant Tribal Government and the service provider for the location(s) at issue.

Other evidence can be submitted that indicates service is planned for the challenged BSLs.

Location is a CAI – Code C

Any Challenger can submit a challenge to a location to claim it is an eligible CAI-. This challenge type is used to identify locations as CAIs based on the CAI definition included in Michigan’s BEAD Initial Proposal Volume I which includes:

- Schools
- Libraries
- Health clinic, health center, hospital, or other medical providers
- Public safety entity
- Institutions of higher education
- Public housing organizations
- Community support organizations including:
 - Senior centers
 - Job training centers
 - Boys and Girls Clubs and YMCAs
 - Community centers
 - Homeless service agencies, food banks, and pantries
 - Zoos, aquariums, museums, and wildlife centers:
 - Organizations offering digital inclusion services (not included in other CAI definitions).
 - Childcare Centers
- Government facilities
- Agricultural labor camps

Michigan’s Initial Proposal Volume I provides additional details on the definition of each of the categories listed above.

The evidence submitted for this challenge type must include **at least** the information listed below:

- Official entity name of the institution
- The type of CAI, selecting from the categories listed above
- Explanation of how the institution facilitates greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals.
- Evidence that the location falls within the definitions of CAIs establish by MIHI in the Michigan BEAD Initial proposal Volume I. This can include:
 - Registration documents
 - Contact information to confirm CAI Status
 - Eligibility for FCC e-Rate or Rural Health Care Program

Other evidence that demonstrates that the organization meets the requirements of the selected category of CAI.

Location is Not a CAI – Code R

Any Challenger can submit a challenge that a location is not a CAI. Similar to the above challenge, the status of a location identified as a CAI in the challenge portal may also be challenged. If successful, this challenge will remove the location from the CAI BEAD eligibility list. It should be noted that a successful “Location is Not a CAI” challenge could still result in an unserved or underserved status as the location may still be considered as a BSL lacking the minimum speed requirements.

The MIHI Office may accept **any** of the following types of evidence:

- Location is a residence as documented by:
 - Property records or real estate listing showing the property as a single-family or multi-family dwelling.
 - Utility bills in the name of the occupant(s) showing usage consistent with residential occupancy.
 - Rental or lease agreement for the property.
 - Internet, cable, or phone bills indicating the location as a residential address.
- Location is a non-CAI business as documented by:
 - Screenshot of business’s website including their location (address)
 - Business registration documents such as a business license or tax identification number.
 - The property being listed as a commercial property in property records or real estate listings.
 - Photo of address and signage indicating the name and type of business at the location.
 - Business cards or promotional materials that list the location as the business address.
- Invoices, receipts, or other financial documents referring to the location as the business address.
- Institution does not fall under the CAI definition and listed categories of CAI types (identify the institution type that the location should be listed as)
- Evidence that demonstrates that the location is no longer in operation:
 - Local new source indicating closure of CAI.
 - Confirmation from local government CAI is no longer in operation.
- Other evidence that the location is not a CAI.

CAI: Qualifying Broadband Unavailable – Code G

Any eligible Challenger may submit a “CAI: Qualifying Broadband Unavailable” challenge. “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.¹² This challenge contests that a CAI is not able to receive Qualified Broadband service.

The MIHI Office may accept evidence that shows Qualifying Broadband service is not available within 500 feet of the CAI. Evidence must include **any** of the following evidence:

- Screenshot from a provider’s website indicating 1Gbps/1Gbps service is not available at the challenged location and/or fiber is not located within 500 feet of the challenged location.
- Communication directly from provider confirming 1Gbps/1Gbps service is not available at the challenged location and/or fiber is not located within 500 feet of the challenged location.
- If there is an available internet connection at the location, Challenger must provide:
 - The name of current provider.
 - The type of technology delivered with the current services.
 - The speed tier of the current plan.
- Other evidence to support fiber is NOT available within 500 feet of the challenged location.

CAI: Qualifying Broadband Available – Code Q

Any eligible Challenger may submit a “CAI: Qualifying Broadband Available” challenge. Similar to the challenge type above, the Qualifying Broadband service at a CAI location may be challenged, if the service in the challenge portal map is reported as unavailable but is in fact available at that location.

The MIHI Office may accept any the following evidence:

- An attestation that the selected CAI Location(s) have an existing connection capable of delivering 1 Gbps/1Gbps symmetrical speeds and a latency less than or equal to 100 milliseconds, or a connection that is readily scalable to these speeds at a higher tier of service over the existing infrastructure.
- If there is an available internet connection at the location, challenger must provide:
 - The name of current provider.
 - The type of technology delivered with the current services.
 - The speed tier of the current plan.
 - A recent bill/invoice and photo of the provider gateway.
- Evidence that the CAI can acquire symmetric gigabit service, including a screenshot from providers website indicating service is available at that location(s), text message, email, letter, voicemail transcript, or other written documentation of phone call or in-person interaction with the provider confirming service availability.
- Other evidence to support that Qualifying Broadband is available at the challenged location.

Acceptable Rebuttal Evidence

Availability – Service Is Not Available Challenge Rebuttal – Code A

Only the service provider whose service availability has been challenged can submit an availability challenge rebuttal. Acceptable rebuttal evidence for each Availability challenge type is provided in the table below:

Type	Challenge Reason	Acceptable Evidence (maximum days from evidence collection)
1	Provider failed to schedule a service installation within 10 business days of a request.	<ul style="list-style-type: none"> • A copy of the customer bill that shows that the location subscribes or has subscribed to the providers service (365 days). • A screenshot from the provider website that shows service availability at that location (365 days). • A copy of an offer sent to the location that provides service is now available as a standard installation (365 days). • Geospatial, as-built diagrams or files of infrastructure deployed to provide service to the location (365 days). • For fixed wireless service, results from a mobile test unit that demonstrate service availability and speed at the challenged location (365 days).
2	Provider did not install the service at the agreed-upon time.	<ul style="list-style-type: none"> • A copy of the customer bill that shows that the location subscribes or has subscribed to the providers service (365 days). • A screenshot from the provider website that shows service availability at that location (365 days). • A copy of an offer sent to the location that provides service is now available as a standard installation (365 days).
3	Provider requested more than the standard installation fee to connect the location.	<ul style="list-style-type: none"> • A copy of an offer sent to the location that provides service is now available as a standard installation (365 days).
4	Provider denied the request for service.	<ul style="list-style-type: none"> • A copy of the customer bill that shows that the location subscribes or has subscribed to the providers service (365 days). • A screenshot from the provider website that shows service availability at that location (365 days). • A copy of an offer sent to the location that provides service is now available as a standard installation (365 days).
5	Provider does not offer the technology entered above at this location.	<ul style="list-style-type: none"> • Evidence from provider network management system showing an appropriate residential gateway that matches the provided service (365 days).
6	Provider does not offer the speed(s) shown on the Broadband Map for purchase at this location.	<ul style="list-style-type: none"> • A copy of the customer bill that shows that the location subscribes or has subscribed to the providers service (365 days). • A screenshot from the provider website that shows service availability at that location (365 days). • A copy of an offer sent to the location that provides service is now available as a standard installation (365 days).
7	No wireless signal is available at this location (only for technology codes 70 and above).	<ul style="list-style-type: none"> • Results from a mobile test unit that demonstrate service availability and speed at the challenged location (365 days).

8	New, non-standard equipment had to be constructed at this location.	<ul style="list-style-type: none"> • A copy of an offer sent to the location that provides service is now available as a standard installation (365 days). • Geospatial, as-built diagrams or files of infrastructure deployed to provide service to the location (365 days).
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Additionally, other evidence for availability may be submitted for rebuttal. Acceptance or rejection of the rebuttal evidence will be at the discretion of the MIHI office.

Area challenges for availability may be rebutted either in whole or by location with evidence that service is available for all BSLs within the census block group, e.g., by network diagrams that show fiber or HFC infrastructure or by subscriber information. For fixed wireless service, the challenge system will offer representative random sample of the area in contention, but no fewer than 10 BSLs, where the provider must demonstrate service availability and speed (e.g., with a mobile test unit). For MDU challenges, the rebuttal must show that the inside wiring reaches all units and is of sufficient quality to support the claimed level of service.¹

MIHI will apply the following process to identify random locations. A representative, random sample of locations will be generated for unique combinations of block groups, providers and technologies. In order to ensure a fair and accurate rebuttal process, the (i) number of locations is based on total service and the individual locations are selected based on both (ii) service provision and (iii) spatial distribution.

- i. The number of locations provided shall be the greater of 10 or 10% of the locations served by that provider in the block group (with service above 25/3). If a provider reports service to fewer than 10 locations in a block group, but more than the number required to trigger an area challenge, all locations will be provided for rebuttal.
- ii. Locations will be selected only for unique provider-technology combinations in each block group. Additionally, the locations will be selected only from locations where the provider reports service of 25 Mbps download and 3 Mbps upload or greater. All other service reported will be excluded.
- iii. Provider locations are chosen based on their spatial distribution within the challenged census block group. All provider-technology combinations in the block group are given a value based on their distance to the centroid (central point) of the relevant census block group and broken into quintiles based on the distance of all provider-technology points in that census block group. Then 20% of the total of the required rebuttal locations are selected at random from each quintile to make the final sample of locations.

These locations will then be created in the Challenge Dashboard as challenges for the provider to rebut.

Availability – Service Is Available Challenge – Code A

Availability – Service Is Available challenges may be rebutted with evidence of the same type as that which is acceptable for submission as evidence to support an Availability – Service Is Not Available Challenge.

¹ A mobile test unit is a testing apparatus that can be easily moved, which simulates the equipment and installation (antenna, antenna mast, subscriber equipment, etc.) that would be used in a typical deployment of fixed wireless access service by the provider.

Rebuttal Reason	Acceptable Evidence (maximum days from evidence collection)
Provider failed to schedule a service installation within 10 business days of a request.	<ul style="list-style-type: none"> • Text message, email, or letter from provider (60 days) • Voicemail transcript from provider (60 days) • Documentation of phone call or in-person interaction (60 days) • Other types of evidence (60 days)
Provider did not install the service at the agreed-upon time.	<ul style="list-style-type: none"> • Text message, email, or letter from provider (60 days) • Voicemail transcript from provider (60 days) • Documentation of phone call or in-person interaction (60 days) • Other types of evidence (60 days)
Provider requested more than the standard installation fee to connect the location.	<ul style="list-style-type: none"> • Text message, email, or letter from provider (365 days) • Other types of evidence (365 days)
Provider denied the request for service.	<ul style="list-style-type: none"> • Screenshot from provider website (60 days) • Text message, email, or letter from provider (60 days) • Voicemail transcript from provider (60 days) • Documentation of phone call or in-person interaction (60 days) • Other types of evidence (60 days)
Provider does not offer the technology entered above at this location.	<ul style="list-style-type: none"> • Screenshot from provider website (60 days) • Text message, email, or letter from provider (60 days) • Voicemail transcript from provider (60 days) • Documentation of phone call or in-person interaction (60 days) • Other types of evidence (60 days)
Provider does not offer the speed(s) shown on the Broadband Map for purchase at this location.	<ul style="list-style-type: none"> • Screenshot from provider website (60 days) • Text message, email, or letter from provider (60 days) • Voicemail transcript from provider (60 days) • Documentation of phone call or in-person interaction (60 days) • Other types of evidence (60 days)
No wireless signal is available at this location (only for technology codes 71 and 72) ⁹ .	<ul style="list-style-type: none"> • Infrastructure related evidence (180 days) • Screenshot from provider website (60 days) • Text message, email, or letter from provider (60 days) • Voicemail transcript from provider (60 days) • Documentation of phone call or in-person interaction (60 days) • Other types of evidence (180 days)
New, non-standard equipment had to be constructed at this location.	<ul style="list-style-type: none"> • Infrastructure related evidence (180 days) • Text message, email, or letter from provider (365 days) • Voicemail transcript from provider (60 days) • Documentation of phone call or in-person interaction (60 days) • Other types of evidence (365 days)

Additionally, other evidence may be submitted to rebut an Availability – Service Is Available challenge. Acceptance or rejection of the rebuttal evidence will be at the discretion of the MIHI office.

Speed Test Challenge Rebuttal – Code S

Only the service provider whose service speed has been challenged can submit a speed test rebuttal. For an individual location, the service provider can submit countervailing speed test from their own network management system as evidence showing sufficient speed. The speed test results must include:

- Time and date the speed test was conducted (must be within the last 60 days).
- Location of the speed test or the provider-assigned internet protocol (IP) address identifying the residential gateway where the test is conducted.
- Download and upload speeds.
- Additionally, other evidence may be submitted for rebuttal to show sufficient speed. Acceptance or rejection of the rebuttal evidence will be at the discretion of the MIHI office.

A service provider may rebut an area or MDU speed test challenge by providing speed tests, in the manner described above, for at least 10% of the customers in the challenged area or MDU. The customers must be randomly selected. Providers must apply the 80/80 rule, i.e., 80% of these locations must experience a speed that equals or exceeds 80% of the speed threshold. For example, 80% of these locations must have a download speed of at least 20 Mbps (that is, 80% of 25 Mbps) and an upload speed of at least 2.4 Mbps to meet the 25/3 Mbps threshold and must have a download speed of at least 80 Mbps and an upload speed of 16 Mbps to be meet the 100/20 Mbps speed tier. Only speed tests conducted by the provider between the hours of 7 pm and 11 pm local time will be considered as evidence for a challenge rebuttal.

MIHI will apply the same approach described in the Availability rebuttal section above to select random locations for speed test.

Latency Challenge Rebuttal – Code L

Only the service provider whose latency has been challenged can submit a countervailing speed test showing latency at or below 100ms. For an individual location, the service provider can submit countervailing speed test from their own network management system or the CAF performance measurements as evidence showing reasonable latency. The speed test results must include:

- Time and date the speed test was conducted (must be within the last 60 days)
- Location of the speed test or the provider-assigned internet protocol (IP) address identifying the residential gateway where the test is conducted.
- Latency results.
- Other evidence may be submitted for rebuttal to show latency at or below 100ms. Acceptance or rejection of the rebuttal evidence will be at the discretion of the MIHI office.

A service provider may rebut an area or MDU latency challenge by providing speed tests, in the manner described above, for at least 10% of the customers in the challenged area or MDU. The customers must be randomly selected. Providers must apply the 80/100 rule, i.e., 80% of these locations must experience a latency that equals 100ms. Only speed tests conducted by the provider between the hours of 7 pm and 11 pm local time will be considered as evidence for a challenge rebuttal.

MIHI will apply the same approach described in the Availability rebuttal section above to select random locations for latency test.

Data Cap Challenge Rebuttal – Code D

Only the service provider whose service has been challenged can submit rebuttal to a data cap challenge. The provider must submit their terms of service for the challenged location showing that it does not impose an unreasonable data cap or offers another plan at the location without an unreasonable cap.

Additionally, a service provider can submit other evidence to demonstrate that a monthly data cap of less than 600 GB has not been imposed on a customer. Acceptance or rejection of the rebuttal evidence will be at the discretion of the MIHI office.

Technology Challenge Rebuttal – Code T

Only the service provider whose service has been challenged can submit rebuttal to a technology challenge. The provider can submit countervailing evidence from their network management system showing an appropriate residential gateway that matches the provided service.

Additionally, the provider can submit other evidence to demonstrate an appropriate residential gateway that matches the provided service. Acceptance or rejection of the rebuttal evidence will be at the discretion of the MIHI office.

Business Service Only Challenge Rebuttal – Code B

Only the service provider whose service has been challenged can submit rebuttal to a business only service challenge. The provider can submit documentation that the service listed in the BDC map is available at the challenged location to residential customers. Rebuttal evidence can include:

- A copy of the residential customer bill that shows that the location subscribes or has subscribed to the providers service within the last 12 months.
- A copy of an offer sent to the location that provides service is now available as a standard installation.
- Evidence from the provider's network management system showing an appropriate residential gateway that matches the provided service.
- Other evidence to demonstrate that the service at the challenged location is available to residential customers. Acceptance or rejection of the rebuttal evidence will be at the discretion of the MIHI office.

Enforceable Commitment Challenge Rebuttal – Code E

Any entity eligible to submit a challenge (Challenger) may rebut an enforceable commitment challenge. The Rebutter can submit documentation that demonstrates the provider has defaulted on their commitment or is otherwise unable to meet the commitment (e.g., is no longer a going concern). They may also submit evidence that the locations are in an area that are subject to an enforceable commitment to less than 100% of locations and the location(s) are not covered by that commitment. Evidence for this rebuttal may include:

- Text message, email, or letter from provider indicating they do not plan to meet their commitment.
- Voicemail transcript from provider indicating they do not plan to meet their commitment.
- Documentation of phone call or in-person interaction with the provider indicating they do not plan to meet their commitment.
- Documentation from the funding entity indicating the provider has defaulted on their commitment.

- Other evidence that demonstrates a provider has defaulted on their commitment or is otherwise unable to meet the commitment. Acceptance or rejection of the rebuttal evidence will be at the discretion of the MIHI office.

Not Part of Enforceable Commitment– Code N

No rebuttals may be submitted for Not Part of Enforceable Commitment Challenges.

Planned Service – Code P

Any entity eligible to submit a challenge (Challenger) may rebut a planned service challenge. The Rebutter can submit documentation showing that the provider is no longer able to meet the commitment (e.g., is no longer a going concern) or that the planned deployment does not meet the required technology or performance requirements. Evidence to rebut a planned service commitment may include:

- Construction contracts, permitting documentation, or similar evidence that indicate the deployment will not be completed by the June 30, 2024, or December 31, 2024, due date (dependent on technology being deployed)
- Other evidence that the deployment is not progressing as planned to meet the deadlines listed above. This can include project letters or other communications from the provider.
- If the challenge includes locations on Tribal Lands, Rebutter may provide evidence that there is no legally binding agreement between the relevant Tribal Government and the service provider for the location(s) at issue.
- Acceptance or rejection of the rebuttal evidence will be at the discretion of the MIHI office.

Location is a CAI – Code C

The CAI being challenged may rebut that the location does not fall within the definition of CAI defined in the approved version of Michigan’s Initial Proposal Volume I, or is no longer in operation. Evidence that may support this rebuttal can include:

- Location is a residence as documented by:
 - Property records or real estate listing showing the property as a single-family or multi-family dwelling.
 - Utility bills in the name of the occupant(s) showing usage consistent with residential occupancy.
 - Rental or lease agreement for the property.
 - Internet, cable, or phone bills indicating the location as a residential address.
- Location is a non-CAI business as documented by:
 - Screenshot of business’s website including their location (address)
 - Business registration documents such as a business license or tax identification number.
 - The property being listed as a commercial property in property records or real estate listings.
 - Photo of address and signage indicating the name and type of business at the location.
 - Business cards or promotional materials that list the location as the business address.
 - Invoices, receipts, or other financial documents referring to the location as the business address.
- Institution does not fall with the CAI definition and listed categories of CAI types (identify the institution type that the location should be listed as)
- Evidence that demonstrates that the location is no longer in operation:
 - Local news source indicating closure of CAI.
 - Confirmation from local government CAI is no longer in operation.

- Other evidence that demonstrates a location is not a CAI will be accepted at the sole discretion of the MIHI office.

Location is not a CAI – Code R

The CAI being challenged may rebut that the location falls within the definition of a CAI in the approved version of Michigan’s Initial Proposal Volume I, or is still operational. Evidence that may support this rebuttal must include:

- Official entity name of the institution
- The type of CAI, selecting from the categories defined above
- Explanation of how the institution facilitates greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals.
- Evidence that the location falls within the definitions of CAIs establish by MIHI in the Michigan BEAD Initial Proposal Volume I. This can include:
 - Registration documents.
 - Contact information to confirm CAI status.
 - Eligibility for FCC e-Rate or Rural Health Care Program.
 - Other evidence that demonstrates that the organization meets the requirements of the selected category of CAI.
- Other evidence that demonstrates a location is a CAI will be accepted at the sole discretion of the MIHI office.

CAI: Qualifying Broadband Unavailable – Code G

The CAI being challenged may rebut that the location does not receive 1 Gbps/1Gbps speed service. The rebuttal evidence must include that qualifying broadband is available to the CAI and is capable of delivering 1 Gbps/1Gbps speed or a connection that is readily scalable to 1 Gbps symmetrical speeds at a higher tier of service over the existing infrastructure. CAIs within 500 ft. of a FTTP network are considered to have 1 Gbps fiber available to their location. Evidence that may support this rebuttal may include:

- Screenshot from a provider’s website indicating 1Gbps/1Gbps service is available at the challenged location and/or fiber is located within 500 feet of the challenged location. Communication directly from provider confirming 1Gbps/1Gbps service is available at the challenged location and/or fiber is located within 500 feet of the challenged location.
- If there is an available Internet connection at the location, Rebutter must provide:
 - The name of current provider.
 - The technology delivered with the current services.
 - The speeds of the current plan.
- Other evidence to support fiber internet is available within 500 feet of the challenged location will also be accepted at the sole discretion of MIHI.

CAI: Qualifying Broadband Available – Code Q

Only the CAI being challenged may rebut that the location does receive 1 Gbps Service. The rebuttal evidence must include that qualifying broadband capable of delivering 1 Gbps/1Gbps speed or a connection that is readily scalable to 1 Gbps symmetrical speeds at a higher tier of service over the existing infrastructure is not available at the CAI. CAIs within 500 ft. of a FTTP network are considered to have 1 Gbps fiber available to their location. Evidence that may support this rebuttal may include:

- Screenshot from a provider's website indicating 1Gbps/1Gbps service is not available at the challenged location and/or fiber is not located within 500 feet of the challenged location.
- Communication directly from provider confirming 1Gbps/1Gbps service is not available at the challenged location and/or fiber is not located within 500 feet of the challenged location.
- If there is an available internet connection at the location, Rebutter must provide:
 - The name of current provider.
 - The technology delivered with the current services.
 - The speeds of the current plan.
- Other evidence to support fiber is NOT available within 500 feet of the challenged location may be accepted at the sole discretion of MIHI.