



Office of the
Chief Information Officer

The Department of Management

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Broadband Map v5 Community & Provider Challenge Instructions

The following instructions are provided for communities and communication service providers seeking to challenge the State of Iowa Broadband Availability Map v5 (“Map v5”) (published at <https://ocio.iowa.gov/broadband-availability-map-version-5>). Residents who wish to challenge Map v5 can access the form directly through the Map. Supplemental materials can be found at <https://ocio.iowa.gov/broadband-availability-map-version-5>.

The challenge window is 30 calendar days; all challenges must be received by September 2, 2022. When submitting a challenge, evidence must be submitted for every location challenged in support of changing the reported service and, if applicable, the likely eligible or likely ineligible status at any location. Documentation that is speculative, generalized, or vague will not be sufficient. You may use the Sworn Statement/Survey provided as a template for gathering evidence concerning the conditions of broadband at locations being challenged. Supporting documentation must be collected and submitted as part of a single pdf file. Reference to the page number of the pdf must be noted in the applicable columns of the Challenge Form. Challenged locations without a referenced page number will not be evaluated. For pdfs exceeding the upload threshold of 25 MB, please email ociogrants@iowa.gov to receive a link to our OneDrive folder for document submission.

In establishing the preliminary designation being “likely eligible” or “likely ineligible” on Map v5, the Office considers the following conditions:

1. Speed *and* Technology Type - existing reported speeds of 100/20 where offered via wireline service are considered. (Note: please see the [Special Statement on Broadband Map v5 and Federal Program Eligibility](#).)
2. Previous Incentive - disqualifying prior federal or state incentives are considered.
3. Reliability - reliability and consistency of existing service is considered. (Note: initially all reported service on Map v5 is presumptively considered reliable and consistent. Supporting evidence must be provided by a challenger to change the eligibility determination on the basis of reliability and consistency.)

Therefore, to change the “likely eligible” or “likely ineligible” status, one or more of those conditions must be impacted such that the preliminary designation of eligibility status can be changed by the Office. For example, a challenge to the reported speed at a location, must show that no current service is facilitated greater than or equal to 100 mbps download / 20 mbps upload wireline service for the Office to change a preliminary determination from “likely ineligible” to “likely eligible.”

Under future federally-funded NOFAs, a location may be eligible for buildout if it is designated unserved or underserved. A location may be deemed unserved when it receives service speeds at less than 25/3. A location may be deemed underserved when it receives service speeds at 25/3 or greater but less than 100/20. A location may be deemed served when it receives service speeds at 100/20 and greater. **Note: under some federal programs, the technology type—wireline vs wireless—is also considered when evaluating eligibility. A “likely eligible” preliminary determination issued by the Office does not indicate that a location would be eligible under all federal funding programs that may be administered by the Office.**

The Office will notify affected parties by posting to the website any notice of challenge received. Final agency decisions shall become final unless, within 30 days of the posting of a final decision, a challenger or person or party aggrieved or adversely affected requests a contested case proceeding pursuant to Iowa Administrative Code chapter 129-6.

Concerning BEAD eligibility:

It is the Office’s current understanding that Broadband Map v5 will NOT be used as the basis for eligibility determinations under the National Telecommunication & Information Administration’s (“NTIA”) upcoming Broadband, Equity, Access, and Deployment (“BEAD”) program. These determinations will be made by NTIA with reference to maps being developed by the Federal Communications Commission (“FCC”). However, the Office may use the data established in Broadband Map v5 to develop challenges to the FCC map used to establish final allocations and eligibility determinations under the BEAD program.

As set forth on Broadband Map v5, “likely eligible” vs “likely ineligible” determinations do not reflect a guarantee or final determination that such locations will be deemed eligible by the FCC or NTIA under the BEAD program. The Office is aware that locations with 100 mbps download / 20 mbps upload or faster wireless service are ineligible under the BEAD program guidelines and asks that challengers DO NOT submit challenges solely on the basis that locations without wireline service but reporting 100 mbps download / 20 mbps upload wireless service or faster are ineligible under BEAD and should be reported as “likely ineligible” on Broadband Map v5.

The Office understands the BEAD guidelines and recognizes that 100 mbps download / 20 mbps upload service or faster results in ineligibility under BEAD regardless of whether the technology present is wireless or wireline. Any preliminary determination of “likely eligible” affixed to a location reporting 100 mbps download / 20 mbps upload or faster wireless only service is intended to signal that the Office believes such locations may be eligible under other (i.e., not BEAD) federal programs with different eligibility standards. If the Office officiates the distribution of federal funds under programs other than BEAD, the Office will release final eligibility GIS layers that reflect the conditions of eligibility under those federal funding sources at the time such grant opportunities are posted, which may reflect that locations with 100 mbps download / 20 mbps upload wireless only service are eligible.

How to Use the Challenge Form

Go to the Map at <https://iowa.maps.arcgis.com/apps/webappviewer/index.html?id=f454e1dd4e1c405787b5f35c56bcfee3>. You must acknowledge the Office’s Special Statement of Broadband Map v5 and Federal Program Eligibility disclaimer. Zoom into the area in which you have challengeable address locations by clicking the **+** on the left side of the Map. Open the challenge form at https://ocio.iowa.gov/sites/default/files/community_and_provider_challenge_form.xlsx.

1. Summary Tab

Review the information on the summary tab. This information describes the challenge process including potential reasons this Office may not evaluate a challenge. You must affirmatively acknowledge by checking the corresponding box all acknowledgments in the white cells. Without these acknowledgements, the entire challenge may not be evaluated.


2. Attestation Tab

Enter the challenger and contact information in sections A and B. In section C, you may enter an explanation if the Challenge Form is not sufficient to capture the nature of your challenge or if additional explanation is required. Finally, you must sign and date the Attestation. Typing your name in the Authorized Signature box represents your signature and your attestation to the veracity of the statements made in the Challenge Form.

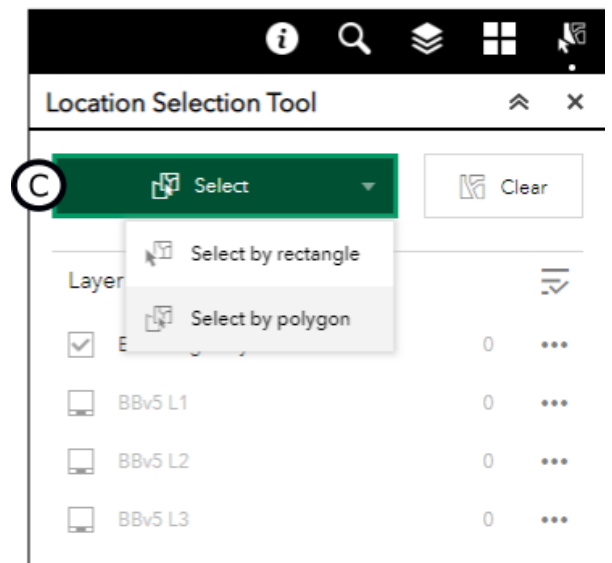
3. Challenge Form Tab

Map v5 reports service on a location-based level. All challenges must be to an address location.

Selecting Challenge Locations

Click the Location Selection Tool  in the upper-corner of the map.

The Location Selection Tool will open. Make sure the layer called BBv5 Eligibility has been checked and is not grayed-out. If the checkbox for BBv5 Eligibility is grayed out, zoom in on the map until the box is no longer grayed out, and then make sure it is checked.



There are 2 tools for selecting locations on the map. Click the green Select box to choose between using either the rectangle or polygon tool (C on image above) to select the map address locations .

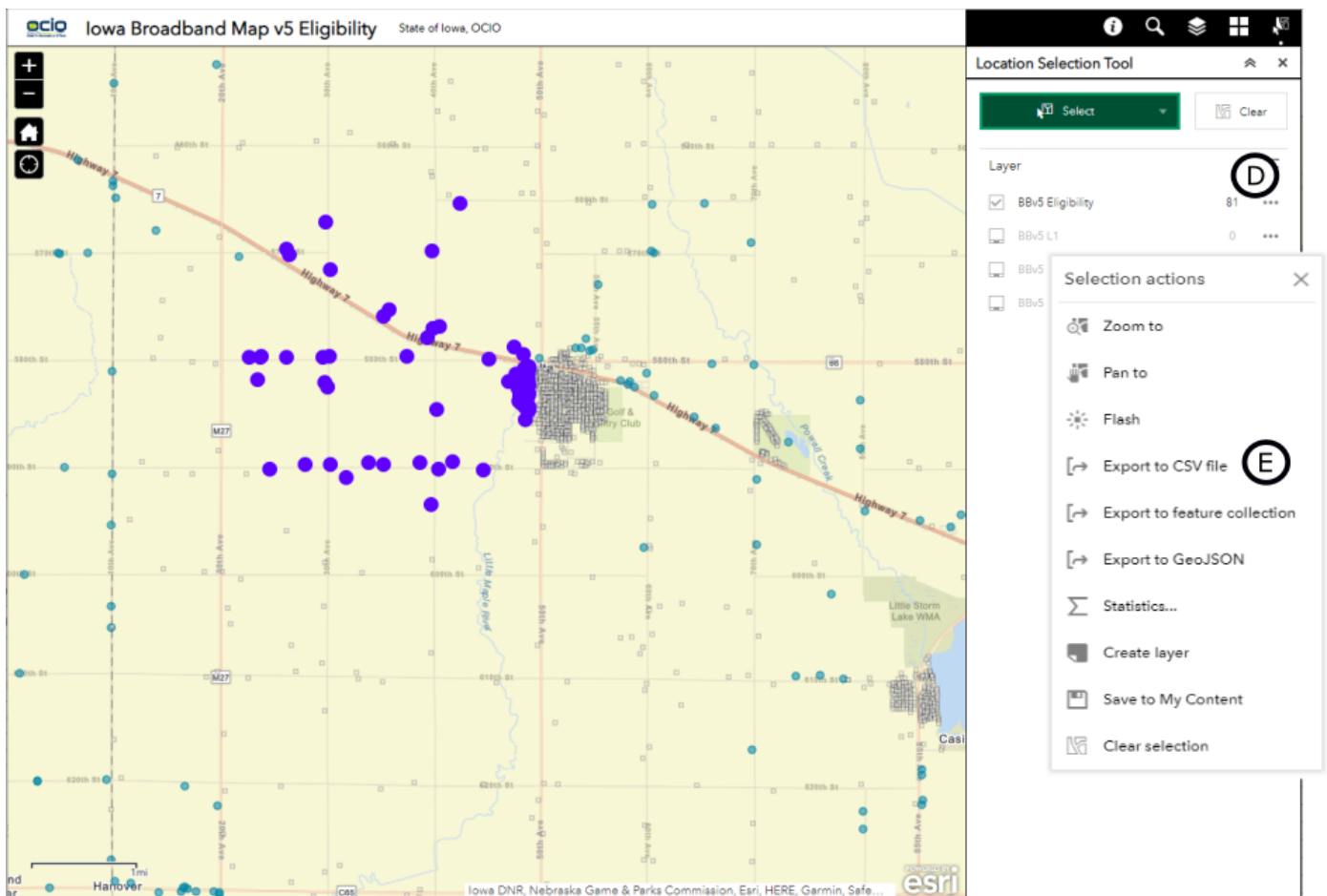
Selecting with Rectangle Option - click and hold the arrow, dragging over the area of the map you wish to challenge. All addresses within that area will highlight blue.

Selecting with Polygon Option - click the map at intervals to establish the perimeter of the area you wish to challenge. Double-click to close the polygon to establish the area you wish to challenge. All addresses within that area will highlight blue.

Use either of the select tools to select the locations to be challenged. All locations selected will be blue on the map. The number of selected locations will appear to the right of the BBv5 Eligibility layer. See D on the image below.

Export Challenge Locations to CSV

To export selected locations, click on the ellipsis (...) on the right-side menu (see D on image below). Choose the option to Export to CSV file (see E on image below). You will be prompted to save the file. Note the location where the file is saved. The default name is features.csv.



Adding address locations to the challenge form

Open the CSV that was just exported and downloaded. Copy columns B-F (IA Location ID through Zip Code) and paste into the tab titled Challenge Form. Click on the first blank cell below the headings in the table and paste the cells at this location. (See image.)

	A	B	C	D	E	F
1	IA Location ID	Street Address	City	State	ZIP Code	No. of Units at address (house, manufactured housing, multi-residential units)
2						
3	382830	5844 40TH AVENUE	ALTA	IA	51002	
4	477264	373 580TH STREET	ALTA	IA	51002	
5	548373	1005 WEST 2ND STREET	ALTA	IA	51002	
6	583496	410 590TH STREET	ALTA	IA	51002	
7	607471	427 590TH STREET	ALTA	IA	51002	
8	858212	440 590TH STREET	ALTA	IA	51002	
9	1195189	383 590TH STREET	ALTA	IA	51002	
10	1305634	453 580TH STREET	ALTA	IA	51002	
11						
12						
13						

Entering the challenge information

Once the address locations are pasted into the Challenge Form, fill out the remaining columns.

Enter the **Number of Units at address** in Column F. For single-family homes or businesses, enter 1. For multi-residential units, enter the appropriate number.

Next, choose a **Basis for Challenge**. There are 13 predetermined bases that may impact the eligibility status of an address location. Note that some of the bases are not sufficient for challenges to the FCC map. Options 11-13 should only be used for providers self-reporting. For Option 13, the agreement must be uploaded as evidence with the corresponding page numbers noted in Column R Other. If you are a provider reporting that you do not offer service to an address location, choose Option 5 - Reported service type does not exist. It is only when a provider is reporting that it does not offer service that supporting evidence is not required.

Next, choose a **Challenge Detail**. If you are a Community submitting this challenge, or a Provider submitting a challenge to dispute another provider’s service, choose “Provider or Community: I am challenging a broadband provider.” If you are a provider disputing information on the Map for your own service, choose the appropriate option beginning “Provider only.”

Depending on the Challenge Detail chosen, subsequent columns will be required to be filled out. For a Provider or Community, **columns L and M** must be filled out. This information represents what you believe the map should display. In column L, choose whether you believe the location is served, underserved, or unserved depending on the speed you believe is actually facilitated at that location. In column M, indicate the technology type you believe is facilitated at that address location.

If you are a provider reporting on your own service, you must fill out **columns I-K**. You will have to provide the fastest download and upload speed, and the technology type you are offering at that location. If you selected Provider only: I do not facilitate service to this location, enter 0 in columns I and J, and No Service in column K. If you are reporting that you facilitate service at a faster speed than reflected on the Map, or the Map does not reflect that you are facilitating service to an address location, choose Provider only: The Map does not correctly reflect service that I facilitate to this location.

Last, in order for your challenge to be evaluated, **evidence** must be provided in support of your challenge. Every location challenged must have a supporting piece of evidence. This evidence must be noted in the challenge form in columns N-Q, depending on the type of evidence you are offering for that address location. Enter the page number of the evidence into the corresponding cell for every location. Only in the case where a provider is reporting that it does NOT facilitate service to an address location on the map is evidence not required. If you are a provider challenging speeds for your own service, you must explain why you are reporting speeds differently now than when information was collected earlier this year in the Affirmation Tab.

Sample Challenge Form:

1	Basis for Challenge	Challenge Detail	I Fastest download speed in Mbps for this type of service	J Fastest upload speed in Mbps for this type of service (Enter 0)	K Technology Type	L Service Conditions The Map Should Reflect		M Evidence: Upload all supporting information for this location in a single PDF. Enter the page number					
						M Is this location served, underserved, or unserved?	N Technology Type	O Affidavit from resident at location	P Survey responses	Q Broadband study expressly citing location	R Speed test at this location	S Other	
3	11 - Provider not reflected on the map	Provider only: The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber								1
4	12 - Provider facilitates speeds faster than that reported	Provider only: The Map does not correctly reflect service that I facilitate to this location	50	5	DSL								2
5	5 - Reported service type (e.g., wireless/FTTH) does not match	Provider only: I do not facilitate service to this location	0	0	No Service								
6	7 - User perception of slow service (e.g., in-home speed test)	Provider or Community: I am challenging a broadband provider				Underserved (< 25/3)	Wireless	3				4	
7	6 - Reported speed not available for purchase (speed test)	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available)	Wired & Wireless	8					
8	10 - User perception of unreliable service (required speed test)	Provider or Community: I am challenging a broadband provider				Underserved (< 25/3)	Wireless		5				
9	5 - Reported service type (e.g., wireless/FTTH) does not match	Provider or Community: I am challenging a broadband provider				Underserved (< 25/3)	No Service	6					
10	13 - Provider holds an enforceable state/federal agreement	Provider only: The Map does not correctly reflect service that I facilitate to this location	100	100	Fixed Wireless								7

Evidence

Every location must have supporting evidence to be challenged. This evidence may include: a sworn statement or survey response from the resident or business owner at the location, a broadband study that expressly cites the address being challenged, or a speed test. You may

use the sworn statement/survey response template found at https://ocio.iowa.gov/sites/default/files/documents/2022/08/sworn_statement_survey_template_0.pdf.

For providers claiming to facilitate service to an address location on the Map, at least one of the following must be provided as evidence of completion:

1. Locations served or could be served in a KML, KMZ or Shapefile format
2. Addresses served or could be served in a spreadsheet, which includes:
 - a. Address, city, state, and zip
 - b. Latitude/longitude coordinates
3. CAD file or shapefile depicting built infrastructure (fiber, conduit, enclosures, structures, etc.)
4. For wireless projects: Tower locations, including height, and approximate effective radius that can serve the speeds declared. The radius measurement unit must be stated (feet, miles, meters, kilometers).

All documentation must be saved into ONE pdf. However, if you are submitting information evidencing service you provide to an address location (from the list above), you can attach that separately to your email. If the size of the pdf is too large to attach to email, please email ociogrants@iowa.gov to receive a link to our OneDrive folder for document submission.

Example of Evidence Citations (without columns I-M):

Basis for Challenge	Challenge Detail	Supporting Information: {Upload all supporting information for this location in a single PDF. Enter the page number(s) in the cell below identifying the exact location of the proof in the PDF.}			
		Sworn Statement/ Survey Response	Broadband study expressly citing location	Speed test at this location	Other
11-Provider not reflected on the map	Provider only: The Map does not correctly reflect service that I facilitate to this location				1
12-Provider facilitates speeds faster than that reported on the map	Provider only: The Map does not correctly reflect service that I facilitate to this location				2
5-Reported service type (e.g., wireless/FTTH) does not exist	Provider only: I do not facilitate service to this location				
7-User perception of slow service (e.g., in-home speed test, sworn statement required)	Provider or Community: I am challenging a broadband provider	3			4
6-Reported speed not available for purchase (speed not offered)	Provider or Community: I am challenging a broadband provider	7			
10-User perception of unreliable service (required sworn statement or survey response)	Provider or Community: I am challenging a broadband provider				
5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider	5			
13-Provider holds an enforceable state/federal agreement to construct service at this location	Provider only: The Map does not correctly reflect service that I facilitate to this location				6

4. Reporting an address not on the Map

If you are challenging a location that is not on the map, use the tab titled **Location Not Present on Map**. Here you can also report when the dot on the map is not accurately positioned above the structure it's supposed to represent.

If you're reporting a location inaccurately positioned, enter the **IA Location ID**. If you're reporting a missing address location, skip the IA Location ID and enter the address.

Enter the **Building Type** (Residential, Business, or Both).

Enter the **Number of Units at address** in Column F. For single-family homes or businesses, enter 1. For multi-residential units, enter the appropriate number.

Enter the **Basis** for this challenge; you'll choose one of 7 options. For addresses missing from the Map, you'll choose 1 - Missing Broadband Serviceable Location. For addresses inaccurately placed on the Map, you'll choose 5 - Location is Not Within Footprint of the Correct Building. If you're making a challenge based on any other option, please contact this Office for further instruction.

Enter the **Fastest download and upload speed** for the type of service facilitated at that address location. If service is not facilitated, enter 0 in columns I and J, and No Service in column K.

Evidence must be provided for all served address locations when reported by the provider. Evidence is referenced by page number in columns L-O.

How to Submit Your Challenge

To submit a challenge, email ociogrants@iowa.gov with the Map v5 Challenge Form (Excel), a pdf of evidence supporting your challenge, and if applicable, supporting information for service that you as a provider are facilitating to an address location. Please title your email "Map v5 Challenge - 'Challenger Name'" using your company, organization, or community name.