

## A Supplemental Guide to the Maryland Challenge Process version 1.0

### 1. Introduction

This document was created to be supplemental to our [user guide](#) found on the [Office of Statewide Broadband's website](#) and will reference the user guide throughout.

### 2.1 Portal Data

There are several data files on the portal. This section will expand on what these files are and what they contain. The location\_id in the data can be tied to the costquest fabric data acquired through a license with costquest to access other fields such as the address of each location.

### 2.2 Data Description and Data Dictionary

This data is available for public download on the [Data Download | FCC National Broadband Map](#) website. The data dictionary can be found at [broadband-map-data-downloads.pdf | Powered by Box](#) in section '3.1.1 Fixed Broadband Availability data'. These files contain the data on broadband technologies the FCC considers reliable. The highest broadband speed given to a location by any of these technologies will be what is used to judge the 'status' of a location as served, unserved, or underserved. This dataset takes the highest download speed from each technology to assess the status of a location. If there are equal speeds from different providers for each location this dataset will only show one of the providers for the purposes of this challenge.

1. The first file 'County name Availability.csv' contains all unfunded locations in Maryland. These locations could be served, unserved, or underserved.
2. The second file 'County name Enforceable Commitments.csv' contains all locations that currently have funding in Maryland. These locations have a status as served, unserved, or underserved however they are not currently being considered for future funding due to Maryland's efforts in deduplication of funding.
3. The third file "CAI\_County\_name.csv" contains the current list of unserved CAIs eligible for funding in Maryland. These CAIs were selected based on the categories outlined in the OSB's User Guide and IPV1.

### 2.3 CSV Template for challenge and rebuttal submissions

**A CSV template has been uploaded to the Portal to facilitate challenges. The CSV template is called 'MD Challenge and Rebuttal Template'.** This template will be used for challenges and bulk challenges. This template contains 3 fields. The first field 'location\_id' field that will contain the ID for the locations being challenged. The second field 'Status' indicates the current status of the challenged location. This should be one of these four Categories - Served, Unserved, Underserved, or Enforceable Commitment. The third field is the code for the challenge being submitted. The code for each allowable challenge can be found in table 2 within our [user guide](#). The column name is 'Code'.

### 3.1 Submitting Challenges

The data available for download is there to provide support to challengers in the challenge process. When submitting a challenge there are a few requirements. Locations for a challenge should all be of the same challenge type. If there are locations you want to submit under a different challenge type make a separate challenge. Our portal allows challengers to submit .Zip files. If a challenge requires several different files to be submitted, send them to a Zip file and submit the Zip file that is generated. Below are specific guidelines for a challenge. The challenge phase ends on August 15th.

### 3.3 Files Necessary for Submission

**Compiling files into a Zip file will be necessary to upload challenges onto the portal. Challenges must be submitted by county and challenge type.**

1. The first file that needs to be uploaded is the CSV template that contains the list of the locations' 'location\_id' being challenged. If select units within a location are being rebutted this should be clarified in the evidence of the challenge. **If a location does not have a location id then it cannot be challenged. This process does not add or remove locations from the fabric. The challenges that add or remove locations from the fabric should be sent to the FCCs Broadband Data Collection (BDC).**
2. The second fill being submitted should be a PDF that includes evidence for each location being challenged. This will differ for each challenge type. The PDF should clearly show what location the evidence is being provided for through the location id and the address. Please see table 2 under the column labeled 'Specific examples of required evidence' in our [user guide](#) for specific examples of evidence required for challenges.

### 3.3 Bulk challenges

Bulk challenges can be submitted in the portal but must follow the guidelines outlined. Bulk challenges must only contain locations consisting of one challenge type. If you have locations of varying challenge types, submit a challenge for each challenge type. If a location has more than one challenge type being submitted it will have to be included in a separate challenge file under the category of the specified challenge type. **It is important to ensure accuracy in bulk challenges. If a bulk challenge is deemed to be significantly inaccurate, the entirety of the challenge will be rejected.**

### 4. Community Anchor Institutions (CAI)

Community Anchor institutions differ slightly from other data sets. When challenging the status of a CAI, follow the same guidelines for challenge submissions in the process outlined in sections 3.1 to the 3.3 of this document. Examples of evidence can be found in table 2 of our [user guide](#). When challenging whether a location is or is not a CAI challengers will follow the guidelines of the categories outlined in section '9.2 CAI Categories' within our [user guide](#).

## 5. Area and MDU challenges

An area challenge is triggered if six or more broadband serviceable locations using a particular technology and a single provider within a census block group are challenged. An MDU challenge requires challenges for one unit for MDUs having fewer than 15 units, for two units for MDUs of between 16 and 24 units, and at least three units for larger MDUs. Here, the MDU is defined as one broadband serviceable location listed in the Fabric. An MDU challenge counts towards an area challenge (i.e., six successful MDU challenges in a census block group may trigger an area challenge).

For example, a complex of apartment buildings may be represented by multiple BSLs in the Fabric. Each type of challenge and each technology and provider is considered separately, e.g., an availability challenge (A) does not count towards reaching the area threshold for a speed (S) challenge. If a provider offers multiple technologies, such as DSL and fiber, each is treated separately since they are likely to have different availability and performance.

Area challenges for availability need to be rebutted 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 a representative, random sample of the area in contention, but no fewer than 10, 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 is reaching all units and is of sufficient quality to support the claimed level of service.

## 6. Submitting Rebuttals

After the challenge phase is completed the Rebuttal phase will begin on August 16th. Providers who have been challenged will have 30 days after notification of challenge is received to submit evidence of a rebuttal. OSB plans to send out all challenge notifications to providers on the first day of the Rebuttal phase, August 16th. Examples of permissible evidence for rebuttals can be found in table 2 of our [user guide](#) under the column labeled 'Permissible rebuttals'. An important note to the rebuttal process is Area and MDU challenges. If challenges have triggered Area or MDU challenges the required evidence for rebuttal will change. These details can be found in this document in the section 5 titled 'Area and MDU Challenges' or in section '10.1 Area and MDU challenges' found in the [user guide](#).

When submitting Rebuttals this method the below method should be followed.

1. The first file that needs to be uploaded is the CSV template that contains the list of the locations' 'location\_id' being rebutted. If select units within a location are being rebutted this should be clarified in the evidence of the rebuttal.

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2. The second fill being submitted should be a PDF that includes evidence for each location being rebutted. This will differ for each challenge type. The evidence should clearly show what location the evidence is being provided for through location id and address. Please see table 2 in our [user guide](#) for specific examples of evidence required for rebuttals. These can be found in table 2 of our user guide under the column labeled 'Specific examples of required evidence'.