



Alaska Statewide Broadband Advisory Board – August 21, 2023

Regular Board Meeting

Alaska Department of Commerce, Community & Economic Development

Meeting Details: https://teams.microsoft.com/l/meetup-join/19%3ameeting_ZmRjYzEzNzUtNTdlni00OTZmLWEyN2EtZjllNWY1YWZlZjJj%40thread.v2/0?context=%7b%22Tid%22%3a%2220030bf6-7ad9-42f7-9273-59ea83fca38%22%2c%22Oid%22%3a%22d2b433dd-fef1-4448-8cca-dff5c66bc3b3%22%7d

Meeting ID: 273 013 022 885; **Passcode:** z7NexK

Call In: 907-202-7104; **Phone Conference ID:** 921810091#

AGENDA

- I. Call to Order and Roll Call
- II. Approval of Agenda
- III. Declarations of Conflict of Interest
- IV. Approval of Minutes from Prior Meeting
- V. Subcommittee Reports
- VI. Staff Reports
- VII. Unfinished Business
- VIII. New Business
 1. Approval of Appointment of George (Tony) Dodge for Mechanical Engineer Position on Technical Working Group
 2. Approval of Appointment of Matthew Narus for Civil Engineer Position on Technical Working Group
 3. Approval to Continue Posting Aerospace Engineer Vacancy on Technical Working Group
 4. Approval to go to “Standby Status” for the Subcommittee to Establish a Technical Working Group
 5. Approval of Footnote 70 Letter to the National Telecommunications & Information Administration
 6. Discussion Item: Draft Digital Equity Plan
 7. Discussion Item: BEAD Initial Proposal Volume I Process
- IX. Public Comment
- X. Board Member Business from the Floor
- XI. Adjournment



Alaska Statewide Broadband Advisory Board

Alaska Department of Commerce, Community & Economic Development

Minutes for Regular Board Meeting- July 17, 2023, at 10:00 AM AKDT

These draft minutes were prepared by staff and have not yet been approved by the board.

Attendance

Present:

Members: Glenda Ledford (chair); Tara Sweeney, vice-chair; Michael Brase, Charles Carpenter, Bryce Edgmon, Anastasia (Ana) Hoffman, Thomas Lochner, Travis Million, Kathleen Moran, Christine O'Connor, and Laurel Shoop.

Staff: Anessa Feero, Administrative Specialist.

Members Absent: Lyman Hoffman, Steven Noonkesser, and Charlene Stern.

1. Call to Order and Roll Call

The Chair called the meeting to order at 10:00 am.

The secretary called the roll, and eleven members of the board were present. Quorum was met.

2. Review/Approve Agenda

Motion by T. Lochner to approve the draft agenda was presented. Seconded by A. Hoffman and approved unanimously.

3. Review/Approve Minutes from Prior Meetings

Motion by T. Million to approve the minutes from prior meetings. Seconded by T. Lochner and approved unanimously.

4. Update from the Subcommittee to Establish a Technical Working Group

Motion by A. Hoffman to enter Committee of the Whole to get an update from the Subcommittee to Establish a Technical Working Group. Seconded by K. Moran and approved unanimously.

C. O'Connor, as chair of the subcommittee, explained the selection process created to fill the Technical Working Group. Applications for each position were accepted, reviewed, and scored by every member of the subcommittee. It was noted that each of the candidates selected by the subcommittee has decades of project work experience in industry and at different Alaskan telecommunications companies. The subcommittee recommended the following people to the Technical Working Group.

- a. Expert in Microwave- Michael Willmon
- b. Expert in Satellite- Martin Marshall
- c. Expert in Fiber Optics- Matt Peterson
- d. Expert in Telecommunications- Daniel Kerschbaum

Martin Marshall was the only candidate in attendance and introduced himself to the board.

The subcommittee has not received any applications for the Aerospace Engineer vacancy.

Motion by A. Hoffman to exit Committee of the Whole. Seconded by K. Moran and approved unanimously.

Motion by T. Lochner to discuss the appointment recommendations from the subcommittee. Seconded by C. Carpenter and approved unanimously.

No objections were raised against any of the candidates presented. C. Carpenter reiterated that each of the candidates was very qualified.

Motion by T. Lochner to accept the four recommended candidates from the agenda into the Technical Working Group. Seconded by C. Carpenter and approved unanimously through roll call vote.

5. Requests from the Alaska Broadband Office

The board reviewed a document in the briefing packet titled, "Anticipated Challenges for the Alaska Broadband Office." T. Lochner presented the following subjects to the board: State Broadband Policy, Goals and Objectives, Project Proposal Processed and Criteria for Project Selection, Mapping and Data Collection and Sharing Efforts, projected Timeline for the Statewide Broadband Advisory Board Recommendations, and Digital Equity Considerations.

Motion by T. Lochner to enter Committee of the Whole to Discuss Broadband Policy, Goals and Objectives. Seconded by L. Shoop.

The board discussed in depth all the challenges presented. They requested more clarification on how the board members can be supportive to the goals of the broadband office.

The board was interested in submitting a Letter to NTIA explaining the challenges that the language in Footnote 70 provides. The Alaska Broadband Office offered to draft language for the board to begin this process.

Motion by T. Sweeney to exit Committee of the Whole. Seconded by C. Carpenter and approved unanimously.

6. Announcements

Chair G. Ledford read a Letter of Resignation from Stewart Ferguson from his position as Representative of the Health Care Community.

The National Telecommunications and Information Administration (NTIA) announced the state allocations for the Broadband Equity Access and Deployment (BEAD) grant program. The allocation to Alaska will be \$1,017,139,672.42.

7. Scheduling for Future Meetings

The board decided to have standing meetings every third Monday of the month, at 10:00 am AKST.

8. Public Comment

No public comment was provided.

9. Adjournment

Motion by A. Hoffman to adjourn. Seconded by C. Carpenter and approved unanimously.

Meeting adjourned at 11:34 am on July 17, 2023. The next meeting is August 21, 2023, at 10:00 am AKST.



Alaska Statewide Broadband Advisory Board Agenda Statement

Item Number:	VIII.1
Item Title:	Approval of Appointment of George (Tony) Dodge for Mechanical Engineer Position on Technical Working Group
Submitted By:	Christine O'Connor, Chair of Subcommittee to Establish a Technical Working Group
Recommendation:	Approve Appointment of George (Tony) Dodge for Mechanical Engineer Position on Technical Working Group
Attachments:	1. Applicant Letter of Interest

Summary Statement:

The Subcommittee to Establish a Technical Working Group met in July to review applications for the vacant positions of Mechanical Engineer, Civil Engineer, and Aerospace Engineer. George (Tony) Dodge Submitted his application for the position of Mechanical Engineer. Mr. Dodge has a strong background in mechanical engineering in Alaska in both the telecommunications and oil industries. He is currently employed with a telecommunications firm.

A copy of his letter of interest is attached for review by the Board.

The Subcommittee recommends the Board appoint Mr. Dodge to the position of Mechanical Engineer on the Technical Working Group.

July 6, 2023

Thomas Lochner
Director, Alaska Broadband Office
Department of Commerce, Community, and Economic Development
550 W 7th Avenue, Suite 1535
Anchorage, AK 99501

Subject: Letter of Interest - Technical Working Group, Broadband Advisory Board

Dear Mr. Thomas Lochner,

I am writing to express my interest in joining the Technical Working Group of the Broadband Advisory Board. I firmly believe that my qualifications and experiences make me an excellent candidate for this vacancy, and I am excited about the opportunity to contribute to the development and expansion of broadband infrastructure in Alaska. The key reasons why I am interested in joining the Technical Working Group are:

Passion for Bridging the Digital Divide: I am deeply passionate about ensuring equitable access to broadband services for all residents of Alaska. I firmly believe that reliable high-speed internet is crucial for economic development, education, healthcare, and overall community well-being.

Expertise in Technology and Telecommunications: With 20 of experience in the telecommunications industry, I have developed a strong understanding of the technical aspects and challenges related to broadband deployment. I have managed projects and teams of engineers to develop and execute telecommunications infrastructure projects and am currently the Director of Network Architecture for Alaska Communications.

Commitment to Collaborative Solutions: I am dedicated to working collaboratively with diverse stakeholders to develop effective strategies and solutions. Throughout my career, I have actively engaged in cross-functional teams, fostering cooperation, and achieving successful outcomes.

I obtained a Bachelor of Science in Mechanical Engineering from the University of Alaska Fairbanks in 2002 and am a licensed Mechanical Engineer in the State of Alaska (ME 11766). Please find my attached resume for a comprehensive overview of my relevant experience. I firmly believe that my qualifications and dedication to bridging the digital divide align with the goals and objectives of the Technical Working Group. By leveraging my experience in both urban and rural Alaska, I am confident that I can contribute effectively to the group's efforts in shaping Alaska's broadband future.

Thank you for your consideration. I look forward to the opportunity to discuss my application further. Should you require any additional information or have any questions, please do not hesitate to contact me.

Sincerely,



George (Tony) Dodge



Alaska Statewide Broadband Advisory Board Agenda Statement

Item Number:	VIII.2
Item Title:	Approval of Appointment of Matthew Narus for Civil Engineer Position on Technical Working Group
Submitted By:	Christine O'Connor, Chair of Subcommittee to Establish a Technical Working Group
Recommendation:	Approve Appointment of Matthew Narus for Civil Engineer Position on Technical Working Group
Attachments:	1. Applicant Letter of Interest

Summary Statement:

The Subcommittee to Establish a Technical Working Group met in July to review applications for the vacant positions of Mechanical Engineer, Civil Engineer, and Aerospace Engineer. Matthew Narus submitted his application for the position of Civil Engineer. Mr. Narus has a diverse background in environmental engineering and project management in Alaska across multiple industries. He is currently working with the telecommunication industry.

A copy of his letter of interest is attached for review by the Board.

The Subcommittee recommends the Board appoint Mr. Narus to the position of Civil Engineer on the Technical Working Group.

July 5, 2023

Alaska Broadband Office
Department of Commerce, Community and Economic Development
Anchorage, AK 99503

Re: Civil Engineer Opening
State Broadband Technical Working Group

To Whom It May Concern:

Please find attached my application materials for the open Civil Engineer position on the Technical Working Group (Advisory Board) for the State Broadband Office. I am eager to support the Broadband Office with their mission to improve internet connectivity across the state. I recognize the importance of this mission, especially for the remote and rural regions of the state. I have first hand experience of the challenges posed to these areas. Many of Kuna's clients are located in rural Alaska that lack broadband capabilities, making communications challenging. Both this summer and last summer I have also struggled with hiring and implementing training for numerous seasonal Kuna employees from communities such as Noatak that lack modern broadband. This limitation has led to the costly requirement to send a trainer to the community in lieu of conducting training over the internet.

I believe my broad based engineering experience and background, coupled with my environmental expertise makes me an ideal fit for the civil engineer position on the working group. I have direct experience with various civil engineering projects, designs, and site development. I have also led numerous permitting and other infrastructure projects. My experience with feasibility studies, also affords me an ability to critically review various elements of broadband development. My environmental expertise will be valuable for the group as permitting issues are a key factor for any project in Alaska. Knowledge of how to manage the permitting processes and various agencies is crucial to achieving project success.

I also have significant board experience, currently leading the Building Committee for St. John United Methodist Church (Anchorage) and serving as a board member for the Society of American Military Engineers.

I look forward to hearing from you on this position and serving with the Working Group to improve broadband connectivity for Alaska.

Sincerely,

A handwritten signature in black ink, appearing to read "M. J. [unclear]".



Alaska Statewide Broadband Advisory Board Agenda Statement

Item Number:	VIII.3
Item Title:	Approval to Continue Posting Aerospace Engineer Vacancy on Technical Working Group
Submitted By:	Christine O'Conner, Chair of the Subcommittee to Establish Technical Working Group
Recommendation:	Approve Continuation of Posting Aerospace Engineer Vacancy on Technical Working Group
Attachments:	None

Summary Statement:

No applications have been received for the position of Aerospace Engineer on the Technical Working Group. The Subcommittee is recommending the posting be continued until the vacancy is filled. Upon receipt of one, or more applications the Subcommittee will reconvene to handle the review and make a recommendation to the full Board.

Broadband Office staff are open to any recommendations for candidate solicitation that the Board may have.



Alaska Statewide Broadband Advisory Board Agenda Statement

Item Number:	VIII.4
Item Title:	Approval to go to "Standby Status" for the Subcommittee to Establish Technical Working Group
Submitted By:	Christine O'Connor, Chair of the Subcommittee to Establish Technical Working Group
Recommendation:	Approve "Standby Status" for the Subcommittee to Establish Technical Working Group
Attachments:	None

Summary Statement:

The Statewide Broadband Advisory Board appointed a subcommittee to establish the Technical Working Group provided for in House Bill 363. With the appointments (expected at this meeting) to the Mechanical and Civil Engineer positions, the eight-member Technical Working Group is fully seated, save the position of Aerospace Engineer. Pending Board approval at this meeting, the position will remain posted until filled.

To the degree possible, the Subcommittee has fulfilled its role to establish the Technical Working Group. It is recommended the Subcommittee go into "Standby Status." If and when one or more applications for the Aerospace Engineer position are received the Subcommittee can reconvene to review applications and make a recommendation to the full Board.



Alaska Statewide Broadband Advisory Board Agenda Statement

Item Number:	VIII.5
Item Title:	Approval of Footnote 70 Letter to National Telecommunications & Information Administration
Submitted By:	Thomas Lochner, Director Melissa Kookesh, Tribal Liaison
Recommendation:	Approve Footnote 70 Letter to National Telecommunications & Information Administration
Attachments:	1. Draft Footnote 70 Letter from SBAB to NTIA; 2. Footnote 70 Letter from ANCSA Regional Association to NTIA

Summary Statement:

At the July 17, 2023 meeting the Statewide Broadband Advisory Board requested staff prepare a draft letter from the Board to NTIA regarding concerns associated with Footnote 70. With the assistance of the Department of Law, that letter has been drafted by staff for review and approval by the Board.

Staff looks forward to Board feedback on the letter. For reference, staff has also included a copy of the letter of the same subject submitted to NTIA by the ANCSA Regional Association.



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Commerce, Community,
and Economic Development

ALASKA BROADBAND OFFICE

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August 17, 2023

The Honorable Alan Davidson
Assistant Secretary of Commerce for Communications and Information
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Dear Secretary Davidson:

The State of Alaska Broadband Advisory Board (SBAB) is incredibly thankful for the infrastructure the National Telecommunications and Information Administration (NTIA) Broadband Equity, Access, and Deployment (BEAD) program will bring to Alaska, and the opportunities that will follow. The SBAB is proud to do our part to help ensure "Internet for All." As a board, we are concerned the entire program, and ultimate infrastructure build out, will be negatively impacted by specific language in the Notice of Funding Opportunity (NOFO) that potentially creates significant challenges for the BEAD projects in Alaska.

Graciously, the NOFO requires plans to deploy broadband to Unserved and Underserved project areas on Tribal Lands to include a "Resolution of Consent from each Tribal Government, from the Tribal Council or other governing body, upon whose Tribal Lands the infrastructure will be deployed."⁷⁰ This language alone is standard and expected. However, Footnote 70 in the NOFO reads:

"In the case of consortiums, a Tribal resolution is required from each Tribal Government on whose Tribal Lands the infrastructure will be deployed. For projects deploying to locations on Tribal Lands in Hawaii, consent must be obtained from the Department of Hawaiian Home Lands. *For projects deploying to locations in Alaska, with the exception of deployments on the Metlakatla Reservation, an Eligible Entity must gain the consent (by Tribal resolution) of 51 percent or more of the federally recognized tribal governments in the Alaska Native Region in which the infrastructure will be deployed* (emphasis added). Consent from the Metlakatla Reservation will not be required for deployments in the Southeast Alaska Region Village..."

If it is the intent for each Tribal Government that owns the land to be given decision making power over their own land, then Footnote 70 misses the mark. While the State of Alaska recognizes and acknowledges that Tribal Governments are all sovereign, each have varying levels of landholdings, if any at all. The land surface rights in and around an Alaska native community are owned by the Village Corporation and the sub-surface rights are owned by the Regional Corporation per the Alaska Native Claims Settlement Act of 1971. Unless a Village Corporation has given land to a Tribal Government,

Footnote 70 inappropriately mandates non-landowners grant consent outside of their jurisdictional authority, on behalf of landowners, to broadband infrastructure projects proposed within a specific region.

Additionally, the language in Footnote 70 doesn't consider the size and diversity within each Alaska Native Corporation Region. For example, Doyon, Limited is one regional corporation of twelve in the state of Alaska. This region of interior Alaska alone includes approximately 172 million acres of land, of which Doyon owns 12.5 million acres. There are 26 Village Corporations and 38 Federally Recognized Tribes within this Region. It would be inappropriate for one Tribe in this region to be subject to a project to which they did not individually consent, just because 20 other tribes (51% of the region) gave consent.

The SBAB anticipates this confusing caveat will be prohibitive to the successful deployment of the BEAD program in Alaska. Significant challenges are anticipated:

1. Interest in the BEAD grant will be stifled among bidders who see this unusual consent requirement as too high of a barrier of entry.
2. It might create arbitrage amongst the approving parties further delaying the process or dissuading potential bidders.
3. Several of the affected communities meet infrequently and it may cause delays in having their voices heard.

The SBAB is charged with making recommendations to the State of Alaska on the behalf of the communities we represent. In service of that, we now offer a recommendation to the NTIA to allow for a waiver from enforcement of Footnote 70 on a region-by-region basis.

The State Broadband Advisory Board appreciates any thoughtful consideration given to this request and looks forward to a timely response from National Telecommunications and Information Administration Leadership. Please reach out to me directly with any questions at gledford@cityofwasilla.gov.

Best regards,

Glenda Ledford, Chair
Statewide Broadband Advisory Board



ANCSA REGIONAL
ASSOCIATION

The Honorable Alan Davidson
Assistant Secretary of Commerce for Communications and Information
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

July 18, 2023

Dear Assistant Secretary Davidson:

On behalf of the ANCSA Regional Association (ARA), I am writing to provide feedback regarding an Alaska-specific rule that has the potential to significantly impact our Alaska Native communities. We appreciate your commitment to Alaska and believe maintaining open communication is the best way to advance our common goal of vastly improved connectivity statewide.

ARA represents the twelve Alaska Native regional corporations created by Congress under the Alaska Native Claims Settlement Act (ANCSA) of 1971. Together, these organizations are responsible for supporting the economic, social, and cultural well-being of over 160,000 Alaska Native people; and in fifty-two short years have become a vital part of our state's economy, philanthropic community, and culture.

Following review, ARA has concerns about the implementation of the rule known as "Footnote 70" and its use in the development of the Alaska Broadband Equity, Access, and Deployment (BEAD) Program map. We believe Footnote 70 was promulgated to acknowledge and protect Tribal sovereignty in funding decisions, a just and worthy effort that ARA wholeheartedly supports; however, the language unfortunately creates the potential for significant practical challenges in funding deployment for Tribal projects depending on how Footnote 70 is interpreted and applied.

It is our understanding that construction of NTIA-funded Tribal broadband projects in our state are contingent upon formal written support from the majority of Tribal councils of the federally recognized Tribes in the project region. We sincerely appreciate and support the attempt to seek input from a broad range of Alaska Native stakeholders, but believe this requirement, as laid out in Footnote 70, does not account for the unique Tribal framework of Alaska. With 229 federally recognized Tribes dispersed across our vast state, experience has shown us that the lack of telecommunications infrastructure in rural Alaska, the busy rhythms of Traditional life, and workforce challenges make it exceedingly difficult to contact many Tribes. Much of the challenge stems from the fact that regions in Alaska are often the size of other large states, and a project in one part of a region may have little significance to Tribes in small communities – often spread across thousands of square miles – in other parts of the same region.

In instances where a Tribal resolution or letter of consent is not received, we ask the NTIA to utilize its discretion in interpreting Footnote 70 to accept documented, good-faith efforts to provide Tribal consultation to ANCs and all 229 federally recognized Tribes.

We want to thank the NTIA staff for their outreach and Tribal consultation efforts; and also bring to your attention, in Alaska, Alaska Native Corporations (ANCs) are the landowners charged with managing the Alaska Native-owned land and resources for the betterment of our Alaska Native people. Therefore, the Federal government is under obligation to conduct consultation with them in the same manner as it does with Tribes. While Tribes and ANCs may represent the same body of Alaska Native people, each play an important and distinct role to make up the mosaic of Alaska Native affairs. It is critically important that Federal agencies engage ***both*** Tribal entities and the ANCSA Corporations as required by EO 13175, Congress, and OMB. ANCs have a variety of experience, vast traditional knowledge, resource development expertise, institutional knowledge, and subsistence understanding - all of which are critical components for Federal agencies to understand and incorporate into Federal decision-making. We hope further discussions with Tribes and other Alaska Native stakeholders can result in flexible solutions that engage impacted parties while also allowing for the efficient execution of projects, which is everyone's ultimate goal.

Our rural and Alaska Native communities have long navigated the challenges of isolation and limited connectivity. By working together to bring these communities into the digital age, we can ensure a brighter future for all Alaskans and Alaska Native people.

Sincerely,



Kim Reitmeier
President
ANCSA Regional Association

cc: Evan Feinman, Director, NTIA
Tim Stelzig, Regional Director, NTIA
Tyler Sachtleben, Broadband Program Specialist, NTIA
Alaska Statewide Broadband Advisory Board, *through Anessa Feero*
Tom Lochner, Director, Alaska Broadband Office
Lisa Von Barga, Deputy Director of Broadband, Alaska Broadband Office
Melissa Kookesh, Tribal Liaison, Alaska Broadband Office



Alaska Statewide Broadband Advisory Board Agenda Statement

Item Number:	VIII.6
Item Title:	Discussion Item: Draft Digital Equity Plan
Submitted By:	Lisa Von Barga, Deputy Director
Recommendation:	None. Discussion item only.
Attachments:	None

Summary Statement:

The Alaska Broadband Office (ABO) officially received the Draft Digital Equity Plan from the Rasmuson Foundation on August 14, 2023. The Plan is now in the internal review process with ABO staff. Following that it will go to Department of Commerce and Governor's Office leadership for review. This process is anticipated to last about two weeks. Upon completion the Draft Digital Equity Plan will be posted and distributed for public review and feedback for a thirty-day period. Broadband Office staff will email the Draft Plan directly to members of the Board so members will have an opportunity to provide comments directly to staff.

Public comments will be reviewed and incorporated into the Plan as appropriate. The Plan will then be submitted to the National Telecommunications & Information Administration for review and approval.

The Final Plan is due to NTIA on September 30, 2023. The timing of the review by NTIA is unknown.

The approved Digital Equity Plan makes the Alaska Broadband Office eligible to apply for State Digital Equity Capacity Grant funding. The Notice of Funding Opportunity (NOFO) for the Capacity Grant program is expected to be released by NTIA in January. Capacity Grant funding is formula based using the same qualifying criteria as the Digital Equity Planning Grant. The ABO anticipates Alaska will receive between \$10-\$13 Million under the Capacity Program. The methodology of how the Capacity Grant funding will be dispersed by the ABO is yet to be determined and will in large part be dictated by the program requirements outlined in the upcoming NOFO.



Alaska Statewide Broadband Advisory Board Agenda Statement

Item Number:	VIII.7
Item Title:	Discussion Item: BEAD Initial Proposal Volume I Process
Submitted By:	Lisa Von Bargaen, Deputy Director
Recommendation:	None. Discussion item only.
Attachments:	None

Summary Statement:

The allocation of BEAD funding to the states and territories on June 30, 2023 started the 180-day timeframe in which Initial Proposals must be completed and submitted to NTIA by December 30, 2023. The Alaska Broadband Office (ABO) has established a more accelerated schedule as is evident throughout this summary.

NTIA has separated the Initial Proposal into two volumes: Volume I (In-State Challenge) and Volume II (In-State Grant Program). The volumes may be submitted separately with Volume I submitted in advance of Volume II, but NTIA will not approve Volume I until Volume II has been submitted.

Volume I

The In-State Challenge process finalizes the locations, both individual Broadband Serviceable Locations (BSLs) and Community Anchor Institutions (CAIs), that may be included in broadband infrastructure deployment projects using Broadband Equity, Access, and Deployment (BEAD) funding. The FCC's Broadband Data Map serves as the baseline upon which challenges are submitted.

Challenges may only be submitted by four different types of entities: Tribal Governments, Local Governments, Non-Profit Organizations, and Internet Service Providers (ISPs). As required by NTIA, challenges must be submitted through an online portal. The ABO will be conducting technical assistance outreach to the four types of entities which may submit challenges, so they understand the process.

There are four different types of challenges that can be submitted:

1. Broadband Serviceable Locations (BSLs): The availability of service may be challenged – whether a BSL is considered unserved, underserved, or served. The existence of a BSL included, or missing, from the map may not be challenged.
2. Community Anchor Institutions (CAIs):
 - a. Availability of service – whether a CAI has symmetrical 1 Gig service.
 - b. Existence of a CAI on the map/list – if a CAI should or should not be included based on the federal definition.
3. Enforceable Commitment: If a BSL or CAI is included in a project that has been funded (but not completed) through another federal grant or loan program (e.g., Tribal Broadband Connectivity Program or USDA ReConnect).

4. Project: If a BSL or CAI is included in a project already scheduled and funded (but not completed) by an existing ISP or utility.

There are three phases of the challenge process once it begins.

- Phase I: Challenges are submitted
- Phase II: Challenges are reviewed by ISPs and are accepted or rebutted
- Phase III: Rebutted challenges are adjudicated by the ABO

Below is a **draft estimated** timeline for the full Volume I process. This timeline could shift significantly depending on the length of time for the two review periods by NTIA. The two review periods are highlighted below in gray.

8.25.2023	Submittal of Draft Volume I to Commerce/Governor's Office Leadership
8.25.2023 – 9.08.2023	Commerce/Governor's Office Leadership Review of Draft Volume I
9.08.2023 – 9.12.2023	ABO Incorporating Edits
9.12.2023 – 10.11.2023	30-Day Public Comment Period of Draft Volume I
10.11.2023 – 10.13.2023	Incorporation of Public Comments into Draft Volume I
10.13.2023	Submittal of Volume I to NTIA
10.13.2023 – 11.13.2023	Estimated Review & Approval Period by NTIA of Volume I
11.13.2023 – 12.13.2023	Publication of Eligible Locations & Challenge Process <i>(Robust notification of Tribal/Local Governments, Non-Profits, and ISPs)</i>
12.14.2023	In-State Challenge Process Officially Begins
12.14.2023 – 1.16.2024	Challenge Portal Open
12.14.2023 – 2.16.2024	ISP Rebuttal Period
12.14.2023 – 3.17.2024	ABO Adjudication of ISP-Rejected Challenges
3.18.2024 – 3.20.2024	Final Challenge Packet Prepared
3.20.2024 – 4.03.2024	Commerce/Governor's Office Leadership Review of Final Challenge Results
4.03.2024 – 4.05.2024	ABO Incorporating Edits
4.05.2024	Submittal of Final Challenge Results to NTIA
4.05.2024 – 5.05.2024	Estimated Review & Approval Period by NTIA of Final Challenge Results
5.05.2024 – 7.05.2024	60-Day Public Posting of Final Approved Challenge Results ¹

Some components of Volume II, and the In-State Grant Program, will be running concurrent to this process. Those dates have yet to be determined and will be reported to the Board when a timeline estimate has been established for the 17 remaining components included in Volume II.

¹ The ABO must post the final, approved Challenge results for 60 days prior to any awards being made under the BEAD program.