

## **Indiana Broadband Office**

### **Policy on Location Eligibility Changes Post-Challenge Process**

#### Overview

The Indiana Broadband Office has an obligation to ensure universal coverage to all unserved and underserved locations in Indiana, as identified in its approved Challenge Process. The IBO will do so through its Subgrantee Selection process, which is currently underway. However, Challenge Processes are imperfect, and the IBO recognizes that there may be a limited number of locations currently on its eligible address list that already receive appropriate, qualifying service.

In Requirement 7 of the NTIA's [Final Proposal Guidance](#), states are permitted to identify BEAD-eligible locations that are not being served through a BEAD project and explain the reason for not including those locations in a BEAD project. Each individual location must be identified with a specific reason code and have accompanying evidence to show that it should not be included in a BEAD project. The NTIA's guidance specifies that "the reason codes should be applied in a narrow set of circumstances."<sup>1</sup>

The remainder of this document provides the Indiana Broadband Office's plan for identifying locations that are listed as eligible in its approved Challenge Process results but will not be part of a BEAD project.

#### Implementation

Internet service providers have a limited timeframe to submit locations that they believe meet the requirements of the reason codes detailed below. When submitting locations, they must also provide the appropriate accompanying evidence to prove that the reason code should be applied to each location.

Internet service providers must submit this information to the Indiana Broadband Office at [indianabroadband@iot.in.gov](mailto:indianabroadband@iot.in.gov) **by January 24, 2025, at 11:59 PM**. There will not be another opportunity to do so.

The Indiana Broadband Office will evaluate all submissions and determine whether the locations and evidence provided meet the standards set forth by the NTIA. The office will make all changes at its own discretion based on the evidence provided and the circumstances that lead to the location's classification.

It is the Indiana Broadband Office's intent to utilize this process to identify:

- Geographic areas with a large number or percentage of locations that should not be served via a BEAD project.

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<sup>1</sup> BEAD Final Proposal Guidance, page 38.

- Areas that were attempted to be addressed during the Challenge Process but were ultimately inadequately classified.

The IBO **does not** intend to utilize this complex and time-intensive process to identify small numbers of locations, individual, stand-alone locations, or locations that should have been addressed during the Challenge Process.

The Indiana Broadband Office will review and make determinations on all submitted locations before the first round of Subgrantee Selection closes on February 12, 2025, at 11:59 PM. The IBO will aggregate its own list of locations that meet the reason code requirements and should be addressed via this process. The office will not award any of these locations during the first round of Subgrantee Selection and will remove them from the eligible address list in preparation for the second round.

Reason Codes and Evidence Standard

The IBO has established four reason codes that internet service providers may identify as the reason for submitting each location. The table below details each reason code and the acceptable evidence to support the location claim.

<b>Reason Code</b>	<b>Evidence Objective</b>	<b>Acceptable Evidence</b>
1: Location should not have a broadband connection	Evidence must demonstrate that the location is not a business or residential location at which internet service can be installed and that there is no demand for such service	Photographic evidence of location AND an attestation from the unit of government or property owner. Any photographic evidence must be a JPEG, timestamped, and geocoded.
2: Location does not need mass-market broadband service due to nature of use	Evidence must demonstrate that the location does not have demand for mass-market broadband service	Photographic evidence of location AND an attestation from the unit of government or property owner. Any photographic evidence must be a JPEG, timestamped, and geocoded.
4: Location is already served by an enforceable commitment	Evidence must demonstrate that the location is already served, or planned to be served, through an enforceable commitment	Must include all the following: <ul style="list-style-type: none"> <li>• Name of the grant program</li> <li>• Address to FCC Location ID matching that occurred</li> <li>• Evidence of the grant agreement or award</li> </ul>
5: Location is already served by a privately funded network	Evidence must unequivocally demonstrate the location is already served with qualifying broadband, or could be connected within 10	Must include one or more of the following: <ul style="list-style-type: none"> <li>• Evidence of subscription, which must include a</li> </ul>

	<p>days of a request with a standard installation fee</p>	<p>date, the address, the technology type, and the speed tier. Any other personally identifiable information must be redacted.</p> <ul style="list-style-type: none"> <li>• Photographic evidence of infrastructure at location. Any photographic evidence must be a JPEG, timestamped, and geocoded.</li> <li>• Network diagram and map. Any network diagram must include an attestation by an officer of the provider.</li> </ul> <p>If an ISP plans to submit a map, please attempt to consolidate the map such that all or several locations submitted can be seen on a single map. The map/network diagram must have sufficient detail such that all locations can be identified, but this can include street and boundary information. Please do not submit individual maps for each location.</p>
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Submission Format

Internet service providers should submit an overview file and all evidence files to the Indiana Broadband Office at [indianabroadband@iot.in.gov](mailto:indianabroadband@iot.in.gov) by January 24, 2025, at 11:59 PM.

The overview file should be saved as a .csv or .xlsx and include the following fields:

- FCC location ID
- Optional: Address (please include if relevant or helpful)
- Reason code
- Name of evidence file

Conclusion

The Indiana Broadband Office has set a collection period during which internet service providers can provide a list of locations and evidence that a location currently on the eligible address list should not be awarded during BEAD Subgrantee Selection. This process will run at the office's

discretion and in compliance with the NTIA's guidance. Please direct any questions to [indianabroadband@iot.in.gov](mailto:indianabroadband@iot.in.gov).