



Washington State
Department of
Commerce

INTERNET FOR ALL IN WASHINGTON

Initial Proposal Volume I

Broadband Equity, Access, and Deployment (BEAD) Program

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Note: Each section below includes the prompt from the National Telecommunications and Information Administration (NTIA) – the federal agency administering the BEAD program – to indicate what information the NTIA is requesting for each requirement. Although not all of these prompts require a written response, the Washington State Broadband Office (WSBO) has included a narrative for each prompt to provide additional context to the reader. The three types of requests include:

Attachment – The NTIA has asked the WSBO to submit document or file to satisfy the requirement.

Text Box – The NTIA has asked the WSBO to describe how it will satisfy the requirement.

Response – The NTIA has asked the WSBO to select either ‘yes’ or ‘no’ in response to a requirement.

DRAFT

EXECUTIVE SUMMARY

Building upon ongoing digital inclusion efforts, extensive public engagement efforts, and insight from local and tribal governments in Washington, the Washington State Broadband Office (WSBO) submits this Initial Proposal Volume I to fulfill the requirements outlined in the Broadband Equity, Access, and Deployment (BEAD) Program.¹ Volume I contains information for four Initial Proposal requirements – out of the 20 total Initial Proposal requirements, a list of which can be found in [Appendix 6.1](#) – including:

- **Requirement 3: Existing Broadband Funding** – Identifies existing broadband efforts funded by the federal government or an Eligible Entity within the jurisdiction of the state to minimize duplication of efforts or funding.
- **Requirement 5: Unserved and Underserved Locations** – Identifies unserved and underserved locations, including locations in applicable tribal lands, using the National Broadband Maps as of **August 29, 2023**.
- **Requirement 6: Community Anchor Institutions (CAIs)** – Defines CAIs and identifies those CAIs that lack access to 1 Gigabit per second (Gbps) symmetrical broadband.
- **Requirement 7: Challenge Process** – Discusses the WSBO’s decision to adopt the National Telecommunications and Information Administration’s (NTIA) model challenge process with the following modifications:
 - Locations considered “served” are locations with broadband speeds of 100 Megabits per second (Mbps) downstream and 20 Mbps upstream or higher. Locations that use digital subscriber line (DSL) as their broadband connection will be designated as “underserved.”
 - Locations initially considered “served” will be underserved if speed tests demonstrate that the location’s actual service speed is below 100 Mbps downstream and 20 Mbps upstream.
 - Location service status could be reconsidered using area or multiple dwelling unit (MDU) challenges.

The state of Washington will incorporate guidance received from the NTIA to ensure compliance with BEAD requirements. It will also consider feedback received from the public comment period on this draft of the Initial Proposal Volume I. The Initial Proposal Volume II will be released for public comment later and include all other requirements outlined in the BEAD Notice of Funding Opportunity (NOFO).²

¹ This follows the state’s submission of the Washington State BEAD Five-Year Action Plan which is publicly available at this link: <https://deptofcommerce.box.com/s/yr03ll1kw1rpd7x4w4wk0z5g6gdah90n>

² National Telecommunications and Information Administration (2022), Notice of Funding Opportunity: Broadband Equity, Access, and Deployment Program. Accessed at: <https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/BEAD%20NOFO.pdf>

Following the submission of the Initial Proposal Volumes I and II – and the NTIA’s approval of Volume I – the WSBO will begin the Challenge Process as outlined in [Chapter 4 – Requirement 7](#).

1. EXISTING BROADBAND FUNDING (REQUIREMENT 3)

Attachment 1.1.1: As a required attachment, submit the file identifying funding sources, a brief description of the broadband deployment and other broadband-related activities, the total funding, the funding amount expended, and the remaining funding amount available. Eligible Entities may copy directly from their Five-Year Action Plans.³

Similar to the information the Washington State Broadband Office (WSBO) included in the Washington State Broadband Equity, Access, and Deployment (BEAD) [Five-Year Action Plan](#), which it submitted on August 11, 2023, the WSBO has summarized existing broadband funding associated with broadband deployment within the state, located in [Appendix 6.2](#). This information includes:

- The **Funding Source** – The funding program and the governmental entity responsible for administering the program.
- The **Purpose** – A brief description of the funding’s role in expanding broadband availability.
- The **Total Funding** – The total amount of funding authorized for projects within the state of Washington.
- The **Expended Funding** – The total amount of funding awarded, and thereby committed, by the administering governmental entity to a specific project and grantee.
- The **Available Funding** – The amount of authorized funding remaining after accounting for all awarded funds.

For existing federal, state, or local funding for broadband deployment on tribal lands, only those awards accompanied by a tribal legally binding agreement, which includes a Tribal Government Resolution, will be considered for deduplication of funding. It is the responsibility of any recipients of an award to build out on tribal lands to produce the necessary documentation during the public comment period for Initial Proposal Volume I or during the Challenge Process itself.

³ NTIA (2023), NTIA Grants Application Portal: BEAD Initial Proposal Submission Guidance. Accessed at: [BEAD Initial Proposal NTIA Grants Portal Clickpath \(doc.gov\)](#)

2. UNSERVED AND UNDERSERVED LOCATIONS (REQUIREMENT 5)

In adhering to the National Telecommunications and Information Administration’s (NTIA) requirements, Volume I of Washington state’s Initial Proposal includes a list of all unserved and underserved locations in Washington. Consistent with the Broadband Equity, Access, and Deployment (BEAD) Notice of Funding Opportunity (NOFO):

- “Unserved” means a location that lacks reliable broadband service at a speed of at least 25 Mbps downstream and 3 Mbps upstream and latency levels low enough to support real-time, interactive applications.
- “Underserved” means locations that lack similar broadband service at speeds of at least 100 Mbps downstream and 20 Mbps upstream.

2.1 UNSERVED AND UNDERSERVED LOCATIONS LISTS

Attachment 1.2.1: As a required attachment, submit one CSV file with the location IDs of each unserved location, including unserved locations in applicable tribal lands.⁴

Attachment 1.2.2: As a required attachment, submit one CSV file with the location IDs of each underserved location, including underserved locations in applicable tribal lands.⁵

Using data from the Federal Communications Commission’s (FCC) National Broadband Map published **August 29, 2023**, the Washington State Broadband Office (WSBO) has included links to two Excel files, with the location IDs of all unserved and underserved locations, in **Appendix 6.3**.

2.2 NATIONAL BROADBAND MAP PUBLICATION DATE

Text Box 1.2.3: Identify the publication date of the National Broadband Map that was used to identify the unserved and underserved locations.⁶

The unserved and underserved locations identified in this document and its attachments are based on the National Broadband Map published on **August 29, 2023**. Consistent with NTIA guidance, the publication date of the National Broadband Map does not predate the submission of the Initial Proposal by more than 59 calendar days. For the Challenge Process, the WSBO will use updated data from the FCC’s National Broadband Map that is published no more than 59 calendar days in advance of the start of the Challenge Process.

⁴ *Ibid.*

⁵ *Ibid.*

⁶ *Ibid.*

3. COMMUNITY ANCHOR INSTITUTIONS (REQUIREMENT 6)

3.1 CAI STATUTORY DEFINITION

Text Box 1.3.1: Describe how the statutory definition of “community anchor institution” (e.g., schools, libraries, health clinics) was applied, how eligible CAIs were identified, and how network connectivity needs were assessed, including the types of CAIs that the Eligible Entity intends to serve.⁷

Following the statutory definition of “community anchor institution” (CAI) as defined in 47 USC 1702 (a)(2)(E), the Washington State Broadband Office (WSBO) applied the definition of a CAI to mean a school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, public housing organization (including any public housing agency, U.S. Department of Housing and Urban Development-assisted housing organization, or tribal housing organization), or community support organization that facilitates greater use of broadband service by vulnerable populations, including, but not limited to, low-income individuals, unemployed individuals, children, the incarcerated, and aging individuals (aged 60 years or older). In addition, the WSBO decided to include government buildings in its definition of CAIs.

The following definitions were used to identify the types of CAIs:

- **Schools:** Public and private K-12 schools associated with a Federal Communications Commission (FCC) E-Rate or National Center for Education Statistics (NCES) ID or those identified through the Washington State Board of Education.
- **Institutions of higher education:** Higher Education organizations with a NCES ID or those identified through the State Board for Community and Technical Colleges.
- **Libraries:** Libraries with an FCC E-Rate ID or those identified through the Washington Secretary of State’s Washington Library Locations list.
- **Health clinic, health center, hospital, or other medical providers:** Health care facilities with a Centers for Medicare and Medicaid Services (CMS) identifier, including health clinics, hospitals, mental health facilities, and in/outpatient treatment centers.
- **Public safety entities:** Fire houses, emergency medical service (EMS), police stations, 911 public safety answering points (PSAP), detention centers, and correctional facilities.
- **Public housing organizations:** Public housing as determined by state Public Housing Agencies or housing listed on the National Housing Preservation Database.
- **Community support organizations:** Youth centers, senior centers, job training centers, and other organizations that facilitate greater use of broadband service by vulnerable populations, including, but not limited to, low-income individuals, unemployed individuals, children, the incarcerated, and aging individuals.

⁷ *Ibid.*

- **Government organizations:** The WSBO has expanded the CAI definition to include certain types of state, local, county, and tribal buildings that provide essential services to their community – requiring consistent and reliable broadband access. They include:
 - **State** – The WSBO included CAIs that offer technical or educational services. Specifically, this includes:
 - WorkSource: A statewide partnership of state, local, and nonprofit agencies that provides an array of employment and training services to job seekers and employers in Washington.⁸ WorkSource uses online platforms for job posting, helping job seekers research industries, develop resumes, and submit job applications.
 - Washington State Department of Social and Health Services (DSHS) community service offices: Locations help eligible individuals and families apply for federal benefits while accessing services such as workforce development or emergency programs.⁹ Public computers are in office lobbies for DSHS business use and include online access to Working Connections Child Care services.
 - Community corrections: Juvenile and adult rehabilitation and reentry offices provide health, educational, counseling and employment services. These reentry facilities need broadband to help incarcerated individuals access educational resources, apply for jobs, and develop digital literacy skills.
 - **Local** – The WSBO included city and town halls because they serve as a base for essential local government administration and as the primary connection point between local communities and government. City and town halls allow citizens to access and interact with policymakers, fully participate in council meetings and the democratic process, and address administrative matters related to housing, business, social services support, and recreation. These services are critical to community health and wellbeing and cannot function in modern society without access to adequate broadband services.
 - **County** – The WSBO included county courthouses because they function as the center of the county judiciary process and often serve as the county’s administrative core. Information technology and broadband services enhance these functions by allowing community members to routinely access broadband services at these locations to participate in the judiciary process and address administrative activities, such as housing applications, permitting, and licensing, as well as social services support.

⁸ WorkSourceWA (2023), About Us. Accessed at: [WorkSourceWA](#)

⁹ Washington State Department of Social and Health Services (n.d.), Services We Offer. Accessed at: [Services We Offer | DSHS \(wa.gov\)](#)

- **Tribal** – The WSBO included the administrative offices of any federally recognized tribal entities that provide essential services to tribal members and offer a place for tribal communities to convene and access information and services online and in person.

A more detailed table identifying the data sources for various CAI subcategories is linked in [Appendix 6.4](#).

The WSBO acknowledges that this list will likely not include every CAI that meets the above criteria and strongly encourages organizations to review this draft list for completeness.

Youth Centers, Job Training Centers, and Senior Centers: The WSBO has specifically identified senior centers, job training centers, and youth centers as organizations facilitating greater broadband use. Through Community Action Plans submitted by Washington counties and tribes, 19 of those plans identified senior centers as community support organizations that would increase broadband use for aging populations. In public engagement sessions throughout the state, many older participants shared hesitancy around connecting to broadband service. The reasons behind this shared sentiment varied from cybersecurity concerns to a lack of broadband availability at home to limited broadband device adoption. Providing senior centers with 1 Gbps speeds can facilitate a safe space for digital skills training sessions targeted towards aging individuals, giving them the tools to participate in the digital society and economy.

Job training centers have also been identified as community support organizations, as they are integral to upskilling workers in Washington state and providing them with a platform to increase their digital literacy and digital skills. Equipping job training centers with 1 Gbps symmetrical broadband service will enable more trainees to connect to broadband at the job training center and to pursue skills training online. Furthermore, for those Washingtonians without broadband service at home, a job training center can provide them with the connectivity needed for a successful job search and application submission. Job training centers serve all Washingtonians.

Finally, of the Community Action Plans submitted by Washington counties and tribes, nine of those plans identified youth centers as community support organizations, as they serve as a safe space for diverse, young community members. Supplying youth centers with 1 Gbps speeds will bridge the divide for those in low-income households or rural communities, for which broadband service may not be available at home. Broadband service is essential for Washington's youth as more K-12 schoolwork is online, giving those without reliable broadband outside the classroom a place to complete homework.

However, the public is welcome to request that additional organizations be added to the list, provided that they meet the BEAD definition of an organization that facilitates greater use of broadband service by vulnerable populations, including, but not limited to, low-income individuals, unemployed individuals, children, the incarcerated, and aging individuals. The WSBO will review any submissions and determine inclusion during the public comment period and as part of the Challenge Process. The ultimate goal is to identify CAIs without access to 1 Gbps symmetrical speeds of broadband service. Please review the Challenge Process guidance in the next chapter, which outlines how to request to add a location as a CAI. A list of CAIs that the WSBO identified

according to the definitions above is linked in [Appendix 6.5](#). To assess the network connectivity needs of the types of eligible CAIs listed above, the WSBO:

- **Conducted a geospatial proximity analysis:** The WSBO conducted a geospatial proximity analysis to determine each CAI’s proximity to broadband serviceable locations (BSLs) served with 1 Gbps symmetrical service under the assumption that a CAI located within 100 feet of a BSL would have the same broadband speed as that BSL. To perform this analysis, the WSBO uploaded the FCC’s National Broadband Map, published **August 29, 2023**, and the comprehensive list of statewide CAIs, with location coordinates, into GIS software. The locations of the CAIs were then compared against known, unserved and underserved BSLs. If a CAI overlapped with a known unserved or underserved BSL, the CAI was marked as either unserved or underserved based on the speeds associated with that point, and the point’s location ID was assigned to the CAI.
- **Will make updates through the public comment process:** The WSBO will also allow CAIs to request to be added to the list of CAIs or to update broadband speeds for their institution as part of [public comment](#), which may differ from the initial geospatial proximity analysis described.

3.2 ELIGIBLE CAI LIST

Attachment 1.3.2: As a required attachment, submit the CSV file (names cai.csv) that lists eligible community anchor institutions that require qualifying broadband service and do not currently have access to such service to the best of the Eligible Entity’s knowledge.¹⁰

Using this methodology and the feedback received, the WSBO compiled the list of those CAIs that likely do not have 1 Gbps symmetrical broadband service. The initial draft list is made available within this document – a link is included in [Appendix 6.6](#) – and is subject to change based on the completion of public comment and further analysis.

¹⁰ NTIA (2023), NTIA Grants Application Portal: BEAD Initial Proposal Submission Guidance. Accessed at: [BEAD Initial Proposal NTIA Grants Portal Clickpath \(doc.gov\)](#)

4. CHALLENGE PROCESS MODEL ADOPTION AND MODIFICATIONS (REQUIREMENT 7)

4.1 NTIA MODEL CHALLENGE PROCESS

Response 1.4.1: Select if the Eligible Entity plans to adopt the NTIA Challenge Process Model for Requirement 7.¹¹

The Washington State Broadband Office (WSBO) will adopt the NTIA’s model challenge process, as outlined in this chapter.¹²

4.2 MODIFICATIONS TO NATIONAL BROADBAND MAP

Text Box 1.4.2: If applicable, describe any modifications to classification of broadband serviceable locations in the Eligible Entity’s jurisdiction as “served,” “underserved,” or “unserved,” and provide justification for each modification.¹³

The WSBO intends to adopt the following optional challenge process modifications:

- **Digital Subscriber Line (DSL) Modifications:** The WSBO will treat locations that the National Broadband Map shows to have available qualifying broadband service (i.e., a location that is “served”) delivered via digital subscriber line (DSL) as “underserved.” This modification will better reflect the locations eligible for BEAD funding because it will facilitate the phase-out of legacy copper facilities and ensure the delivery of “future-proof” broadband service. This designation cannot be challenged or rebutted by the provider.¹⁴
- **Speed Test Modifications:** The WSBO will treat as “underserved” locations that the National Broadband Map shows to be “served” if rigorous speed test methodologies (i.e., methodologies aligned to the BEAD Model Challenge Process Speed Test Module) demonstrate that the “served” locations receive service that is materially below 100 Mbps downstream and 20 Mbps upstream. This modification will better reflect the locations eligible for BEAD funding because it will consider the actual speeds of locations. As described below, the provider can rebut such speed tests during the rebuttal period.¹⁵
 - More details on speed test requirements may be found in [Section 4.6 – Challenge Process Design](#).

¹¹ *Ibid.*

¹² NTIA (2023), NTIA BEAD Model Challenge Process. Accessed at: [BEAD Challenge Process Policy | Internet for All \(internet4all.gov\)](#)

¹³ NTIA (2023), NTIA Grants Application Portal: BEAD Initial Proposal Submission Guidance. Accessed at: [BEAD Initial Proposal NTIA Grants Portal Clickpath \(doc.gov\)](#)

¹⁴ NTIA (2023), NTIA BEAD Model Challenge Process. Accessed at: [BEAD Challenge Process Policy | Internet for All \(internet4all.gov\)](#)

¹⁵ *Ibid.*

4.3 ELIGIBLE ENTITY PLANNING TOOLKIT

Response 1.4.3: Select if the Eligible Entity plans to use the BEAD Eligible Entity Planning Toolkit to identify existing federal enforceable commitments.¹⁶

The WSBO has decided that it will use the BEAD Eligible Entity Planning Toolkit to identify existing federal enforceable commitments.¹⁷

4.4 ENFORCEABLE COMMITMENTS IDENTIFICATION

Text Box 1.4.4: Describe the process that will be used to identify and remove locations subject to enforceable commitments.¹⁸

The WSBO will enumerate locations subject to enforceable commitments by using the BEAD Eligible Entity Planning Toolkit and consult at least the following data sets:

1. The Broadband Funding Map published by the Federal Communications Commission (FCC) pursuant to IIJA § 60105.
2. Data sets from state broadband deployment programs that rely on funds from the Capital Projects Fund and the State and Local Fiscal Recovery Funds administered by the U.S. Treasury.
3. Washington state and local data collections of existing enforceable commitments.

The WSBO will make its best effort to create a list of broadband serviceable locations (BSLs) subject to enforceable commitments based on state/territory or local grants or loans. If necessary, the WSBO will translate polygons or other geographic designations (e.g., a county or utility district) describing the area to a list of Fabric locations. The WSBO will submit this list, in the format specified by the FCC Broadband Funding Map, to NTIA.

For existing federal, state, or local funding for broadband deployment on tribal lands, only those awards accompanied by a tribal legally binding agreement, which includes a Tribal Government Resolution, will be considered for deduplication of funding. It is the responsibility of any recipients of an award to build out on tribal lands to produce the necessary documentation during the public comment period for Initial Proposal Volume I or during the Challenge Process itself.

The WSBO will review its repository of existing state and local broadband grant programs to validate the upload and download speeds of existing binding agreements to deploy broadband infrastructure. In situations in which the state of Washington or local program did not specify broadband speeds or when there was reason to believe a provider or entity that has established a contract with the state to provide broadband service to end users deployed higher broadband speeds than required, the WSBO will reach out to the contracted entity to verify the deployment

¹⁶ NTIA (2023), NTIA Grants Application Portal: BEAD Initial Proposal Submission Guidance. Accessed at: [BEAD Initial Proposal NTIA Grants Portal Clickpath \(doc.gov\)](#)

¹⁷ NTIA (2023), NTIA BEAD Model Challenge Process. Accessed at: [BEAD Challenge Process Policy | Internet for All \(internet4all.gov\)](#)

¹⁸ NTIA (2023), NTIA Grants Application Portal: BEAD Initial Proposal Submission Guidance. Accessed at: [BEAD Initial Proposal NTIA Grants Portal Clickpath \(doc.gov\)](#)

speeds of the binding commitment. The WSBO will document this process by requiring grantees to sign a binding agreement certifying the deployed broadband speeds.

The WSBO drew on these grantee agreements and its existing database on state and local broadband funding programs' binding agreements to determine the set of Washington state and local enforceable commitments.¹⁹

4.5 ENFORCEABLE COMMITMENTS LIST

Attachment 1.4.5: As a required attachment, submit the list of the federal, state/territorial, and local programs that will be analyzed to remove enforceable commitments from the set of locations eligible for BEAD funding.²⁰

According to BEAD Initial Proposal Guidance, because the WSBO has decided to use the BEAD Eligible Entity Planning Toolkit, it will list the state or local programs that it will use to identify existing enforceable commitments. The WSBO has compiled this list based on the funding programs previously documented under [Chapter 1 – Requirement 3](#). A link is included in [Appendix 6.7](#).

4.6 CHALLENGE PROCESS DESIGN

Text Box 1.4.6: Describe the plan to conduct an evidence-based, fair, transparent, and expeditious challenge process.²¹

Based on the NTIA BEAD Challenge Process Policy Notice and the WSBO's understanding of the goals of the BEAD program, the proposal represents a transparent, fair, expeditious, and evidence-based challenge process.²²

PERMISSIBLE CHALLENGES

The WSBO will only allow challenges on the following grounds:

- The identification of eligible community anchor institutions, as defined by the Eligible Entity (see list of permissible challengers on next page),
- Community anchor institution BEAD eligibility determinations,
- BEAD eligibility determinations for existing BSLs,
- Enforceable commitments, or
- Planned service.

PERMISSIBLE CHALLENGERS

During the BEAD Challenge Process, the WSBO will only allow challenges from 501(c)(3) nonprofit organizations, units of local and tribal governments, and broadband service providers.

¹⁹ NTIA (2023), NTIA BEAD Model Challenge Process. Accessed at: [BEAD Challenge Process Policy | Internet for All \(internet4all.gov\)](#)

²⁰ NTIA (2023), NTIA Grants Application Portal: BEAD Initial Proposal Submission Guidance. Accessed at: [BEAD Initial Proposal NTIA Grants Portal Clickpath \(doc.gov\)](#)

²¹ *Ibid.*

²² NTIA (2023), NTIA BEAD Model Challenge Process. Accessed at: [BEAD Challenge Process Policy | Internet for All \(internet4all.gov\)](#)

CHALLENGE PROCESS OVERVIEW

The Challenge Process conducted by the WSBO will include four phases and two internal turnaround buffers, spanning approximately 117 calendar days.²³

1. **Publication of Eligible Locations:** Before beginning the Challenge Phase, the WSBO will publish the set of locations eligible for BEAD funding, which consists of the locations resulting from the activities outlined in Sections 5 and 6 of the [NTIA BEAD Challenge Process Policy Notice](#) (e.g., administering the deduplication of funding process). The office will also publish locations considered served, as they may be challenged. The tentative timeline for the Publication of Eligible Locations phase is April 1, 2024 – April 7, 2024.
2. **Challenge Phase:** During the Challenge Phase, the challenger will submit the challenge through the WSBO’s challenge portal. This challenge will be visible to the service provider whose availability and performance are contested. The portal will notify the provider of the challenge through an automated email, including related information about the timing of the provider’s response. After this stage, the location will enter the “challenged” state.
 - a. **Minimum Level of Evidence Sufficient to Establish a Challenge:** The challenge portal will verify that the address provided can be found in the Fabric and is a BSL. The challenge portal will confirm that the challenged service is listed in the National Broadband Map and meets the definition of reliable broadband service. The challenge will confirm that the email address is reachable by sending a confirmation message to the listed contact email. For scanned images, the challenge portal will determine whether the quality is sufficient to enable optical character recognition (OCR). For availability challenges, the WSBO will manually verify that the evidence submitted falls within the categories stated in the NTIA BEAD Challenge Process Policy Notice and the document is unredacted and dated.
 - b. **Timeline:** Challengers will have 30 calendar days to submit a challenge from the time the initial list of unserved and underserved locations, community anchor institutions, and existing enforceable commitments are posted. The tentative timeline for the Challenge Phase is April 8, 2024 – May 7, 2024.
3. **Internal Turnaround Buffer:** The WSBO has built-in ten days to validate the challenges and send them to the challenged service provider. The tentative timeline for the Internal Turnaround Buffer is May 8, 2024 – May 17, 2024.
4. **Rebuttal Phase:** Only the challenged service provider may rebut the reclassification of a location or area with evidence, causing the location or locations to enter the “disputed” state. The challenge is sustained if a challenge that meets the minimum level of evidence is not rebutted. A provider may also agree with the challenge and thus transition the

²³ The NTIA BEAD Challenge Process Policy Notice allows up to 120 calendar days. Broadband offices may modify the model challenge process to span up to 120 days, as long as the timeframes for each phase meet the requirements outlined in the NTIA BEAD Challenge Process Policy Notice.

location to the “sustained” state. Providers must regularly check the challenge portal notification method (e.g., email) for notifications of submitted challenges.

- a. **Timeline:** The rebuttal period begins once the provider is notified of the challenge and thus may occur concurrently with the challenge phase. After receiving a challenge notification, providers will have 30 calendar days to provide rebuttal information to the WSBO. The tentative timeline for the Rebuttal Phase is April 8, 2024 – June 16, 2024.
5. **Final Determination Phase:** During the Final Determination phase, the WSBO will make the final determination of the classification of the location, either declaring the challenge “sustained” or “rejected.”
 - a. **Timeline:** Following the intake of challenge rebuttals, the WSBO will make a final challenge determination within 30 calendar days of the challenge rebuttal. Reviews will occur on a rolling basis as challenges and rebuttals are received. The tentative timeline for the Final Determination Phase is June 17, 2024 – July 16, 2024.
 6. **Internal Turnaround Buffer:** The WSBO has built-in ten days for additional public posting, if necessary. The tentative timeline for the Internal Turnaround Buffer is July 17, 2024 – July 26, 2024.

EVIDENCE & REVIEW APPROACH

To ensure that each challenge is reviewed and adjudicated based on fairness for all participants and relevant stakeholders, the WSBO will review all applicable challenge and rebuttal information in detail without bias before deciding to sustain or reject a challenge. The WSBO will document the standards of review to be applied in a Standard Operating Procedure and will require reviewers to document their justification for each determination. The WSBO plans to ensure reviewers have sufficient training to apply the review standards uniformly to all challenges submitted. The WSBO will also require that all reviewers submit affidavits to ensure no conflict of interest in making challenge determinations. As noted in the Challenge Process Overview, the WSBO has added internal turnaround buffer days to validate the information submitted and support smooth transitions between phases. Unless otherwise noted, “days” refers to calendar days.

The table below outlines each challenge type that will be accepted, in addition to their code and description. For each accepted challenge type, the table also provides specific examples and outlines permissible rebuttals.

Code	Challenge Type	Description	Specific Examples	Permissible rebuttals
A	Availability	The broadband service identified is not offered	<ul style="list-style-type: none"> • Screenshot of provider webpage. • A service request was refused within the last 180 days (e.g., an email or letter from a 	<ul style="list-style-type: none"> • Provider shows that the location subscribes or has subscribed within the last

Code	Challenge Type	Description	Specific Examples	Permissible rebuttals
		at the location, including a unit of a multiple dwelling unit (MDU).	<p>provider).</p> <ul style="list-style-type: none"> • Lack of suitable infrastructure (e.g., no fiber on poles). • A letter or email dated within the last 365 days that a provider failed to schedule a service installation or offer an installation date within 10 business days of a request.²⁴ • A letter or email dated within the last 365 days indicates that a provider requested more than the standard installation fee determined by the WSBO to connect this location or that a Provider quoted more than the provider's standard installation charge to connect service at the location. <i>Note:</i> Providers receiving BEAD funding cannot charge end users a connection fee that their BEAD funding request should already cover. 	<p>12 months, e.g., with a copy of a customer bill.</p> <ul style="list-style-type: none"> • If the evidence was a screenshot and believed to be in error, a screenshot that shows service availability. • The provider submits evidence that the service is now available as a standard installation, e.g., via a copy of an offer sent to the location.
S	Speed	The actual speed of the service tier falls below the unserved	Speed test by subscriber using M-Lab, showing the insufficient speed, and meeting the	Provider has countervailing M-Lab speed test evidence showing sufficient speed,

²⁴ A standard broadband installation is defined in the Broadband DATA Act (47 U.S.C. § 641(14)) as “[t]he initiation by a provider of fixed broadband internet access service [within 10 business days of a request] in an area in which the provider has not previously offered that service, with no charges or delays attributable to the extension of the network of the provider.”

Code	Challenge Type	Description	Specific Examples	Permissible rebuttals
		or underserved thresholds. ²⁵	requirements for speed tests.	e.g., from their own network management system. ²⁶
L	Latency	The round-trip latency of the broadband service exceeds 100 milliseconds (ms). ²⁷	Speed test by a subscriber, showing excessive latency.	The provider has countervailing speed test evidence showing latency at or below 100 ms (e.g., from the provider's network management system or the CAF performance measurements). ²⁸
D	Data cap	The only service plans marketed to consumers impose an unreasonable capacity allowance ("data cap") on the consumer. ²⁹	<ul style="list-style-type: none"> • Screenshot of provider webpage. • Service description provided to the consumer. 	The provider has terms of service showing that it does not impose an unreasonable data cap or offers another affordable plan at the location without a speed reduction or an unreasonable

²⁵ The challenge portal must gather information on the subscription tier of the household submitting the challenge. Only locations with a subscribed-to service of 100/20 Mbps or above can challenge locations as underserved, while only locations with a service of 25/3 Mbps or above can challenge locations as unserved. Speed challenges that do not change the status of a location do not need to be considered. For example, a challenge that shows that a location only receives 250 Mbps download speed even though the household has subscribed to gigabit service can be disregarded since it will not change the status of the location to unserved or underserved.

²⁶ As described in the NOFO, a provider's countervailing speed test should show that 80% of a provider's download and upload measurements are at or above 80% of the required speed. See *Performance Measures Order*, 33 FCC Rcd at 6528, para. 51. See BEAD NOFO at 65, n. 80, Section IV.C.2.a.

²⁷ *Performance Measures Order*, including provisions for providers in non-contiguous areas (§21).

²⁸ *Ibid.*

²⁹ An unreasonable capacity allowance is defined as a data cap that falls below the monthly capacity allowance of 600 GB listed in the FCC 2023 Urban Rate Survey (FCC Public Notice DA 22-1338, December 16, 2022). Alternative plans without unreasonable data caps cannot be business-oriented plans not commonly sold to residential locations. A successful challenge may not change the status of the location to unserved or underserved if the same provider offers a service plan without an unreasonable capacity allowance or if another provider offers reliable broadband service at that location.

Code	Challenge Type	Description	Specific Examples	Permissible rebuttals
				cap below the most recent FCC Urban Rate Survey (600GB for 2023).
T	Technology	The technology indicated for this location is incorrect.	Manufacturer and model number of residential gateway (CPE) that demonstrates the service is delivered via a specific technology.	The provider has countervailing evidence from their network management system showing an appropriate residential gateway that matches the provided service.
B	Business service only	The location is residential, but the service offered is marketed or available only to businesses.	Screenshot of provider webpage.	Provider documentation that the service listed in the Broadband Data Collection program (BDC) is available at the location and is marketed to consumers.
E	Enforceable Commitment	The challenger has knowledge that broadband will be deployed at this location by the date established in the	Enforceable commitment by the service provider (e.g., authorization letter, executed contract). In the case of tribal lands, the challenger must submit the requisite legally binding agreement between the relevant tribal government and the	Documentation that the provider has defaulted on the commitment or is otherwise unable to meet the commitment (e.g., end user testimonials, county

Code	Challenge Type	Description	Specific Examples	Permissible rebuttals
		deployment obligation.	service provider for the location(s) at issue (see Section 6.2 above).	commissioner letter, etc.).
P	Planned service	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.	<ul style="list-style-type: none"> Construction contracts or similar evidence of ongoing deployment and evidence that all necessary permits have been applied for or obtained. Contracts or a similar binding agreement between the WSBO and 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>i.e.</i>, a separate federal grant program), including the expected date deployment will be completed, which must be on or before June 30, 2024. 	Documentation that shows the provider can no longer 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.
N	Not part of the enforceable commitment.	This location is in an area subject to an enforceable commitment to less than 100% of locations and is not covered by	Declaration by service provider subject to the enforceable commitment.	Construction contracts or similar evidence of ongoing deployment that include the challenged location in the scheduled build to be completed on

Code	Challenge Type	Description	Specific Examples	Permissible rebuttals
		that commitment. (See BEAD NOFO at 36, n. 52.)		or before June 30, 2024. Service provider to provide KMZ file, list location fabric identification number (Fabric ID), and timeline demonstrating planned coverage.
C	The location is a community anchor institution (CAI)	The location should be classified as a CAI.	Evidence that the location falls within the definitions of CAIs set by the WSBO (a form will be available). ³⁰	Evidence that the location does not fall within the definitions of CAIs set by the WSBO or is no longer in operation (a form will be available).
R	Location is not a CAI	The location is currently labeled as a CAI but is a residence, a non-CAI business, or no longer in operation.	Evidence that the location does not fall within the definitions of CAIs set by the WSBO or is no longer in operation (a form will be available).	Evidence that the location falls within the definitions of CAIs set by the WSBO or is still operational (a form will be available).

AREA AND MDU CHALLENGE

The WSBO will administer area and multiple dwelling unit (MDU) challenges for challenge types A, S, L, D, and T. An area challenge reverses the burden of proof for availability, speed, latency, data caps, and technology if a defined number of challenges for a particular category, across all challengers, have been submitted for a provider. Thus, the provider receiving an area challenge or MDU must demonstrate that they are indeed meeting the availability, speed, latency, data cap

³⁰ For example, eligibility for FCC e-Rate or Rural Health Care program funding or registration with an appropriate regulatory agency may constitute such evidence, but the Eligible Entity may rely on other reliable evidence that is verifiable by a third party.

and technology requirement for all (served) locations within the area or all units within an MDU. The provider can use any of the permissible rebuttals listed above.

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 by at least three units or 10% of the unit count listed in the Fabric within the same broadband serviceable location, whichever is larger.

Each type of challenge and each technology and provider is considered separately, i.e., an availability challenge (A) does not count towards reaching the area threshold for a speed (S) challenge. Suppose a provider offers multiple technologies, such as DSL and fiber. In that case, each is treated separately since they will likely have different availability and performance.

Area challenges for availability need to be rebutted with evidence that service is available for all BSLs within the census block group, e.g., by network diagrams that show fiber or hybrid-fiber coaxial (HFC) infrastructure or customer subscribers. For fixed wireless service, the challenge system will offer a representative random sample of the area in contention, but no fewer than 10 locations, where the provider has to demonstrate service availability and speed (e.g., with a mobile test unit).³¹

SPEED TEST REQUIREMENTS

The WSBO will accept speed tests as evidence for substantiating challenges and rebuttals. Each speed test consists of three measurements taken on different days. Speed tests cannot predate the beginning of the challenge period by more than 60 calendar days.

Speed tests can take four forms:

1. A reading of the physical line speed provided by the residential gateway, i.e., DSL modem, cable modem (for HFC), optical network terminal (for fiber-to-the-home), or fixed wireless subscriber module.
2. A speed test reading is available from within the residential gateway web interface.
3. A reading of the speed test found on the service provider's web page.
4. A speed test is performed on a laptop or desktop computer within immediate proximity of the residential gateway using speed test applications. The WSBO and NTIA have selected the M-Lab speed test application for this use.

Each speed test measurement must include:

- The time and date the speed test was conducted.
- The provider-assigned internet protocol (IP) address, either version 4 or version 6, which identifies the residential gateway conducting the test.

³¹ 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.

Each group of three speed tests must include:

- The name and street address of the customer conducting the speed test.
- A certification of the speed tier the customer subscribes to (e.g., a copy of the customer's last invoice).
- An agreement, using an online form provided by the Eligible Entity, that grants access to these information elements to the Eligible Entity, any contractors supporting the challenge process, and the service provider.

The IP address and the subscriber's name and street address are considered personally identifiable information (PII). Thus, they are not disclosed to the public (e.g., as part of a challenge dashboard or open data portal).

Each location must conduct three speed tests on three different days; the days do not have to be adjacent. The median of the three tests (i.e., the second highest (or lowest) speed) is used to trigger a speed-based (S) challenge, for either upload or download. For example, suppose a location claims a broadband speed of 100 Mbps/25 Mbps and the three speed tests result in download speed measurements of 105, 102 and 98 Mbps and three upload speed measurements of 18, 26 and 17 Mbps. In that case, the speed tests qualify the location for a challenge since the measured upload speed marks the location as underserved.

Subscribers may conduct speed tests, but speed test challenges must be gathered and submitted by units of local or tribal government, nonprofit organizations, or a broadband service provider.

Subscribers submitting a speed test must indicate the speed tier they are subscribing to since speed tests can only be used to change the status of locations from "served" to "underserved," only speed tests of subscribers that subscribe to tiers at 100/20 Mbps and above are considered. If the household subscribes to a speed tier of 100/20 Mbps or higher and the speed test yields a speed below 100/20 Mbps, this service offering will not count towards the location being considered served. However, even if a particular service offering does not meet the speed threshold, the eligibility status of the location may not change. For example, suppose a location is served by 100 Mbps licensed fixed wireless and 500 Mbps fiber. In that case, conducting a speed test on the fixed wireless network that shows an effective speed of 70 Mbps does not change the status of the location from served to underserved.

The existing WSBO speed test portal, powered by M-Lab, will be modified to serve as a central hub for collecting necessary speed test data. Speed test data collected through the WSBO speed test portal will be made available to challenging entities for use in challenges. Use of the portal is not required, and challenging entities may utilize their data collection methods provided they align with program requirements.

A service provider may rebut an area speed test challenge by providing speed tests, as described above, for at least 10% of the customers in the challenged area. 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.³² 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 7:00 p.m. and 11:00 p.m. local time will be considered evidence for a challenge rebuttal.

TRANSPARENCY PLAN

The WSBO is developing an outreach plan for potential applicants and will begin broadly communicating the forthcoming challenge process as early as the release of Volume I (this document) for public comment until November 10, 2023. This will encourage the general public and potential challengers to consider this opportunity as early as possible. To support a Challenge Process that is transparent and open to public and stakeholder scrutiny, the WSBO will, upon approval from NTIA, publicly post an overview of the challenge process phases, challenge timelines, and instructions on how to submit and dispute a challenge. This documentation will be posted publicly for at least two months before opening the challenge submission window. The WSBO also plans to actively inform all units of local and tribal government of its challenge process and set up regular touchpoints and webinars to address any comments, questions, or concerns from local and tribal governments, nonprofit organizations, and internet service providers. The WSBO will use multiple strategies to increase public and potential challenger awareness of the timing and specific methods of submitting a challenge to support transparency. These strategies include, but are not limited to:

- Monthly WSBO public webinars. These webinars will be held online and broadcast on TVW on the fourth Wednesday of every month through the end of 2024. Registration is available on the [WSBO's website](#).
- Regularly scheduled WSBO Tribal Office Hours. These events are held on the last Thursday of every month at 11:00 a.m. For registration information, leaders and members of federally recognized tribes can contact the WSBO directly at internetforall@commerce.wa.gov.
- Communications to the public and potential challengers. Contact methods may include, but are not limited to, email, social media, and press releases.
- Communications to telecommunication companies. The WSBO will work with the Washington Utilities and Transportation Commission (UTC) to obtain and update contact information from the [UTC directory of telecommunication companies](#) so that providers can be notified of challenges. The WSBO will also review contact information from previously awarded federal and state grants.
- Focused outreach for local governments, including counties, cities, ports, and public utility districts. Focused outreach may include presenting at local government associations, including the Washington Public Utility District Association, Washington

³² The 80/80 threshold is drawn from the requirements in the CAF-II and RDOF measurements. See BEAD NOFO at 65, n. 80, Section IV.C.2.a.

State Association of Counties, Association of Washington Cities, and others. The WSBO will also continue to set up calls with broadband and network infrastructure leaders across government entities.

- Engagement with nonprofit partners through a focused communications campaign and speaking opportunities at regional meetings or forums. For example, the WSBO will engage with Digital Navigators to disseminate information on the Challenge Process to their communities.
- Engagement at regional conferences or meetings. These will include, but are not limited to, those hosted by Affiliated Tribes of Northwest Indians (ATNI), Washington Independent Telecommunications Association, Infrastructure Assistance Coordinating Council (IACC), Washington Association of Counties, and Association of Washington Cities.
 - IACC: October 24, 2023 – October 26, 2023
 - ATNI: January 28, 2024 – February 1, 2024
 - Other conference dates are to be determined.
- Regional outreach through Broadband Action Teams (BATs). The WSBO will collaborate with BATs to promote Challenge Process engagement and awareness.

The public and potential challengers may sign up on the WSBO website [Internet for All in Washington - Washington State Department of Commerce](#) for challenge process updates and newsletters. They can engage with the WSBO by a designated email address: InternetforAll@Commerce.wa.gov. Providers will be notified by an automatic email when a challenge has been received.

Beyond actively engaging stakeholders, including those listed above, the WSBO will also post all submitted challenges and rebuttals before final challenge determinations are made, including:

- The provider, nonprofit, or unit of local government or tribal government that submitted the challenge,
- The census block group containing the challenged broadband serviceable location (BSL),
- The provider being challenged,
- The type of challenge (e.g., availability or speed), and
- A summary of the challenge, including whether a provider submitted a rebuttal.

The WSBO will not publicly post personally identifiable information (PII) or proprietary information, including subscriber names, street addresses, or customer IP addresses. To ensure all PII is protected, the WSBO will review the basis and summary of all challenges and rebuttals to remove PII before posting them on the website. It will also adhere to any applicable state data and privacy legislation about protecting PII. Additionally, guidance will be provided to all challengers regarding which information they submit may be posted publicly.

The WSBO will treat information submitted by an existing broadband service provider designated as proprietary and confidential, consistent with applicable federal law. If any of these responses do contain information or data that the submitter deems to be confidential commercial information that should be exempt from disclosure under state open records laws or is protected under applicable state privacy laws, that information should be identified as privileged or confidential to the extent allowed pursuant to Washington Public Records Act RCW 42.56. Otherwise, the responses will be made publicly available.

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5. CONCLUSION

The public comment period is open for 30 days and will close on November 10, 2023. To comment on any section of this volume of Washington’s BEAD Initial Proposal, please visit the [Initial Proposal Volume I Public Comment Survey](#).

The WSBO is currently working on Volume II of the Initial Proposal, which will include additional information about the planning process, the subgrantee selection process, and other requirements associated with using BEAD funding. Please continue to monitor our website for the most up-to-date information on the BEAD process and [sign up for updates on the Internet for All in Washington mailing list](#).

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6. APPENDIX

6.1 INITIAL PROPOSAL REQUIREMENTS BY DOCUMENT

Document	Contents
Initial Proposal – Volume I	Requirement 3: Existing Broadband Funding – <i>may be satisfied by completion of the Five-Year Action Plan</i>
	Requirement 5: Unserved and Underserved Locations
	Requirement 6: Community Anchor Institutions (CAIs)
	Requirement 7: Challenge Process
Initial Proposal – Volume II	Requirement 1: Objectives – <i>may be satisfied by completion of the Five-Year Action Plan</i>
	Requirement 2: Local, Tribal, and Regional Broadband Planning Coordination – <i>may be satisfied by completion of the Five-Year Action Plan</i>
	Requirement 4: Local Coordination
	Requirement 8: Deployment Subgrantee Selection
	Requirement 9: Non-deployment Subgrantee Selection
	Requirement 10: Eligible Entity Implementation Activities
	Requirement 11: Labor Standards and Protections
	Requirement 12: Workforce Readiness
	Requirement 13: Minority Business Enterprises (MBEs)/ Women’s Business Enterprises (WBEs)/ Labor Surplus Firms Inclusion
	Requirement 14: Cost and Barrier Reduction
	Requirement 15: Climate Assessment
	Requirement 16: Low-Cost Broadband Service Option
	Requirement 20: Middle Class Affordability ³³
	Requirement 17: Use of 20 Percent of Funding
Requirement 18: Eligible Entity Regulatory Approach	
Requirement 19: Certification of Compliance with BEAD Requirements	

³³ The information presented in this table follows the order by which the WSBO will submit information to the NTIA. According to the NTIA’s Guidance, Eligible Entities will submit information related to “Middle Class Affordability” after describing their “Low-Cost Broadband Service Option.”

6.2 EXISTING BROADBAND FUNDING

A table identifying existing broadband funding sources within the state, using the NTIA template, can be accessed using the link below.

[Existing Broadband Funding link](#)

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6.3 UNSERVED AND UNDERSERVED LOCATIONS

The NTIA provided a template for all states to use for identifying all unserved and underserved locations within a state.

The CSV file containing all unserved locations in Washington state according to the National Broadband Map data published **August 29, 2023**, can be accessed using the link below.

["unserved.csv" - Washington State Unserved Locations link](#)

The CSV file containing all underserved locations in Washington state according to the National Broadband Map data published **August 29, 2023**, can be accessed using the link below.

["underserved.csv" - Washington State Underserved Locations link](#)

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6.4 CAI DATA SOURCES

CAI Type	Description	Original Data Source
S: Schools and Educational Institutions, such as:	K-12 school (public)	FCC e-rate
		National Center for Education Statistics
	K-12 school (private)	Washington State Board of Education
		National Center for Education Statistics
	Technical college	State Board for Community and Technical Colleges
		National Center for Education Statistics
Community college	State Board for Community and Technical Colleges	
	National Center for Education Statistics	
University	National Center for Education Statistics	
L: Libraries	Library	FCC E-Rate
		Washington Geospatial Open Data Portal
H: Health and Medical Providers, such as:	Clinic (Includes medical clinics, rural health clinics, in/outpatient treatment centers)	Washington Department of Health
		Centers of Medicare & Medicaid Services
	Hospital (Includes hospitals, medical centers, ambulatory centers, VA hospitals, in/outpatient treatment centers)	Centers of Medicare & Medicaid Services
		Centers of Medicare & Medicaid Services
Mental health facilities	Centers of Medicare & Medicaid Services	
F: Public Safety Entities, such as:	Fire station	Homeland Infrastructure Foundation-Level Data
	Emergency medical service station (EMS)	Washington State Department of Health
	Police station	Homeland Infrastructure Foundation-Level Data
	Detention center	Washington Defender Association
	Correctional center	Washington State Department of Corrections

	Public safety answering point (PSAP)	Emergency Management Division ³⁴
P: Public Housing Organization	Public housing organization	U.S. Department of Housing and Urban Development
		Commerce Department's HFU building database
		Public Housing Authorities (40)
C: Community support organization that facilitates greater use of broadband service by vulnerable populations, including:	Job training center	Broadband Community Anchor Institution Listing (2015)
		Washington Office of Superintendent of Public Instruction
	Senior center	Broadband Community Anchor Institution Listing (2015)
		Care Washington
	Youth center	Broadband Community Anchor Institution Listing (2015)
G: Government Buildings	WorkSource	WorkSource WA
	Washington State Department of Social and Health Services (DSHS) community services offices	DSHS
	Community corrections	Broadband Community Anchor Institution Listing (2015)
		Washington State Department of Children, Youth, and Families
		Washington State Department of Corrections (field offices)
		Washington State Department of Corrections (reentry centers)
	City/town halls	Broadband Community Anchor Institution Listing (2015)
	County courthouses	Washington State Courts
Tribal administrative offices	Federally recognized tribes' websites (29)	

³⁴ Information on PSAPs was provided directly to the WSBO from the Emergency Management Division.

6.5 LIST OF CAIs THROUGHOUT WASHINGTON STATE

The list of CAIs the WSBO identified according to the definitions outlined in [Chapter 4](#) can be accessed using the link below.

[List of CAIs link](#)

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6.6 LIST OF UNSERVED AND UNDERSERVED CAIs

The list of CAIs the WSBO identified as unserved or underserved according to its geospatial proximity analysis can be accessed using the links below.

["cai.csv" - Unserved and Underserved CAIs \(Public version\) link](#)

["cai.csv" - Unserved and Underserved CAIs \(NTIA submission version\) link](#)

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6.7 LIST OF STATE AND LOCAL PROGRAMS

In accordance with NTIA guidance, the WSBO is including a list of state and local broadband programs that are not included in the NTIA's Eligible Entity Planning Toolkit. For reference, the toolkit will include information for all federally funded programs, except for broadband programs funded through ARPA. The list of state and local programs that the WSBO will use to identify and remove existing enforceable commitments from the set of locations eligible for BEAD funding can be accessed using the link below.

["Deduplication of Funding Programs" link](#)

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