



OTA Technical Conference

BSL and BDC Challenges: Why and How

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BSL AND BDC CHALLENGES: Why and How

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The FCC's National Broadband Map

- Impact on Funding:
 - The underlying data in the National Broadband Map is being used for broadband funding decisions
 - Enhanced A-CAM offers were based on locations in the FCC's Broadband Serviceable Locations (BSL) Fabric and BDC availability data as shown on the National Broadband Map
 - BEAD funding is based on unserved BSLs with no enforceable commitment as shown on the National Broadband Map
 - RDOF location adjustments are based on BSL Fabric locations
 - The next support term for CAF BLS has been deferred to 1/1/2026 to allow the FCC time to complete its rulemaking on future CAF BLS carrier obligations
 - Future CAF BLS obligations likely to be determined based on National Broadband Map data



The FCC's National Broadband Map

- Impact on Reporting and Compliance Obligations:
 - The FCC is using the BSL Fabric to verify compliance with high-cost USF program deployment obligations
 - CAF BLS Five Year Milestone: FCC's Order implements "all locations within the study area" language from the Dec. 2018 RoR Order to mean "at least 95% of locations reflected on the National Broadband Map and underlying Fabric data are validated as served by the carrier in its study area."
 - Enhanced A-CAM HUBB Reporting: carriers will report using BSL Fabric IDs
 - RDOF HUBB Reporting: carriers are transitioning to using BSL Fabric IDs



The FCC's National Broadband Map

- National Broadband Map Layers:
 - *Locations* from the Broadband Serviceable Location (BSL) Fabric developed by CostQuest
 - BSL: a location that would typically subscribe to mass market, retail broadband service
 - Excludes large businesses or community anchor institutions that would typically subscribe to enterprise grade data services (BDS/special access)
 - Updated location data is released every 6 months ahead of the next Broadband Data Collection reporting period
 - *Broadband availability* reported by Internet Service providers through the FCC's Broadband Data Collection
 - Both layers need to be reviewed for accuracy and challenged when inaccuracies are found





Challenging the BSL Fabric

Challenging the BSL Fabric

- Service providers should review each newly released version of the BSL Fabric (latest rel. June 2025)
 - Use mapping software to compare BSLs from the Fabric to your service area
 - Does the Fabric show a greater number of broadband serviceable locations in your service area than actual existing serviceable locations?
 - Are there broadband serviceable locations in your service area that are not listed in the Fabric data?
 - If the answer to either question is yes – it's time to file a bulk Fabric challenge.
 - Service providers may submit bulk Fabric challenges challenging multiple locations in one file using a template provided by the FCC



Challenging the BSL Fabric

- Reasons to challenge Fabric data
 - BSLs missing from Fabric data
 - Fabric data identifies an uninhabitable structure/land formation as BSL
 - Location is mischaracterized in Fabric data (BSL vs non-BSL)
 - Reminder: BSL = location that would subscribe to fixed mass-market retail broadband
 - Location's address/unit count/building type is incorrect in Fabric data
 - Multi-tenant locations are counted as a single location (building) with multiple units
 - Location coordinates are incorrect
 - Lat/long show the barn as the BSL vs the residence; lat/long fall outside the building footprint



Challenging the BSL Fabric

- What must be included for *each location* in the challenge file
 - Name, e-mail address and telephone number of entity's challenge data contact
 - Challenge category (type)
 1. Location is missing from the Fabric
 2. Primary address for location is incorrect
 3. Unit count for the location is incorrect
 4. Building type code for this location is incorrect
 5. Different building on same property should be the BSL
 6. Location does not or would not have a broadband connection
 7. Add supplemental address
 8. Remove supplemental address



Challenging the BSL Fabric

- Whether a particular field should contain information varies based on challenge category. Examples:
 - Fabric Location ID
 - Leave blank if adding missing BSL or removing supplemental address; otherwise, location ID is required
 - Primary Address, City, State, ZIP, +4
 - Address information fields required only for adding missing locations, correcting primary address or adding supplemental address; otherwise, leave blank
 - Unit Count
 - Required for adding missing BSL or correcting unit count; otherwise, leave blank



Challenging the BSL Fabric

- The FCC no longer requires a separate “evidence” file – certain details may be provided in the template fields:
 - NON BSL Codes to indicate location would not have a standalone broadband connection (for Cat. 6 challenge to remove locations)
 - D – Location demolished; not expected to be rebuilt
 - B – Location previously, but not currently, habitable
 - C – Location has no electricity (grid or off-grid) or plumbing
 - U – Location is a support structure (garage, barn, shed) to nearby building
 - M – Location intended to be mobile (RV or boat)
 - R – Land formation (large rock, collection of hay bales)
 - Z – Location doesn’t exist for another reason
 - O – Location doesn’t required broadband for another reason



Challenging the BSL Fabric

- “Support Structure” codes
 - Optional for Category 1 (adding location) with Building Type S or Category 6 (removing location) with NON BSL Code U (leave blank otherwise)
 - J – Garage, parking structure, or car port
 - H – Storage shed
 - N – Barn
 - I – Silo
 - W – Power generation facility
 - O – Other



Challenging the BSL Fabric

- Best practices when submitting a challenge to add missing locations (Type 1 Challenge)
 - *Do not* upload a list of addresses compiled for another purpose (addresses from billing system or E911 databases) – use mapping software to identify the locations
 - While you can use an address as a starting point, keep in mind that BSLs in Fabric are based on *geographic coordinates for building footprints* – address on record may be unreliable for determining precise coordinates
 - A missing *address* in the Fabric doesn't necessarily indicate the *location* is missing from the Fabric – compare addresses based on the coordinates. Does the address need to be corrected?

Challenging the BSL Fabric

- Once your file is prepared, submit via the BDC Filing System
 - From BDC Dashboard, click Create Submission
 - Select Crowdsourcing Challenge from the options
 - Then select Bulk Fabric Challenge
 - From Bulk Fabric Challenge page, click Create Submission
 - Upload File
 - System will validate data
 - Certify Data (submission is not complete unless certified)
- FCC will review, then accept or reject challenges



Challenging the BSL Fabric

- Review Fabric data when updated versions are released
 - File any necessary challenges within 60 days for best chance of inclusion in next version of the Fabric
 - *Divide and conquer* – examples
 - Address portions of your service area at a time and upload challenge file as each section is completed
 - Separate challenges by type (adds/removes) and prioritize accordingly
 - Example: Add locations where a new subdivision was built



Challenging the BSL Fabric

- Bulk Fabric Challenge Resources
 - Bulk Fabric Challenge CSV Template
 - <https://www.fcc.gov/sites/default/files/bdc-bulk-fabric-challenge-template-sample.csv>
 - Bulk Fabric Challenge Data Specification Documentation
 - <https://www.fcc.gov/sites/default/files/bdc-bulk-fabric-challenge-spec.pdf>
 - *This documentation provides a concise explanation of what is to be included (or left blank) for each field in the template*
 - BDC Help Center: How to Submit a Successful Bulk Fabric Challenge
 - <https://help.bdc.fcc.gov/hc/en-us/articles/13308560752155-How-to-Submit-a-Successful-Bulk-Fabric-Challenge>





BDC Availability Challenges

Challenging BDC Availability

- Bulk fixed availability challenges are filed to dispute the broadband service coverage reported by *other internet service providers* as reflected on the FCC's National Broadband Map
 - Review the National Broadband Map to see where competitive overlap may exist within your service area
 - Is the availability reported by competitors accurate?
 - If you have *evidence* that an ISP is overstating their broadband service coverage, consider filing a bulk fixed availability challenge.



Challenging BDC Availability

- Bulk fixed availability challenges are subject to an FCC two-part review process
 1. The FCC determines whether the challenger provided enough information to pass initial screening - evidence is required
 2. Determination on merits after the challenged ISP has had an opportunity to respond
- Under FCC rules, bulk challenges need to meet a higher standard of evidence than individual consumer challenges
 - Bulk challengers must provide **clear and convincing evidence** that a challenged provider's data are inaccurate



Challenging BDC Availability

- What methodology will you use? Three options:
 - Methodology 1: Knowledge of provider's infrastructure
 - A separate evidence file supporting the challenge is *required*
 - Methodology 2: Information collected from individual consumers
 - A separate evidence file is *optional* but encouraged
 - Methodology 3: Other (any methodology not based on the first two options)
 - A separate evidence file is *optional* but encouraged
 - *Note that speed tests cannot be used as a methodology for fixed availability challenges. Speed test data may be submitted as bulk crowdsource data; however, challenged providers are not required to respond to bulk crowdsource data filings.*

Challenging BDC Availability

- Supporting evidence must be provided for *each specific location* included in the availability challenge
 - Evidence does not need to be complicated, but must be sufficient to support the challenge
 - Screenshots from provider websites, copies of emails or online chats that demonstrate a lack of service availability at the location(s)
- Evidence should clearly relate to the provider being challenged and the services reported as available for specific locations included in the challenge
 - Connection between evidence and the challenge should be apparent, or explained with further detail



Challenging BDC Availability

- Examples of supporting evidence related to specific challenge type
 - Challenge: the provider does not offer any service at a location, including with the selected technology
 - Supporting evidence: screenshots from provider websites, copies of emails or online chats that demonstrate the provider does not offer service at the location; narrative including date/time of requesting service and description of interaction with the provider
 - Challenge: the provider does not offer the selected technology for purchase at, or reported the wrong technology for, this location
 - Supporting evidence: same as above *or* infrastructure or physical plant maps/location data; permit information and/or provider agreements (fiber/copper); information on location of cell towers, signal strength, propagation characteristics (fixed wireless)



Challenging BDC Availability

- Examples of supporting evidence related to specific challenge type
 - Challenge: reported maximum advertised speeds are not available for purchase at this location from this provider and technology
 - Supporting evidence: screenshots of promo/marketing materials from provider website; screenshots showing speed is not available for purchase at the challenged location
 - Challenge: no wireless or satellite signal is available at this location
 - Supporting evidence: copies of surveys or readings; information about the location of cell towers, signal strength, propagation characteristics, etc. (fixed wireless only)



Challenging BDC Availability

- Bulk Availability Challenge Resources
 - How to Format Bulk Fixed Challenge and Crowdsourcing Data
 - <https://help.bdc.fcc.gov/hc/en-us/articles/10390523851803-How-to-Format-Bulk-Fixed-Challenge-and-Crowdsourcing-Data>
 - CSV templates are found on that page
 - Differences between Bulk Fixed Availability Challenge Data and Crowdsourcing Data
 - <https://help.bdc.fcc.gov/hc/en-us/articles/10390788241307-Differences-between-Bulk-Fixed-Availability-Challenge-Data-and-Crowdsourcing-Data>
 - Data Specifications for Bulk Fixed Availability Challenge and Crowdsourcing Data
 - <https://www.fcc.gov/sites/default/files/bdc-bulk-fixed-challenge-spec.pdf>



The Baker Tilly Team is Available to Assist!

If you have questions about Bulk Fabric Challenges or Bulk Fixed Availability Challenges, please reach out to:

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Questions?

Thank you!

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