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# INTERNET FOR ALL WISCONSIN

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## BEAD Challenge Process Step-by-Step Instructions for Submitting a *Challenge Rebuttal*

Docket 5-BCH-2024

## Appendix 4: Step-by-Step Instructions for Submitting a Rebuttal

### 1. Review submitted challenges.

All submitted challenges will be available to view in the BEAD Challenge list that will be updated on the [PSC BEAD Challenge Process webpage and uploaded to the docket 5-BCH-2024](#). The BEAD Challenge list will have the same format and columns as the BEAD Challenge and CAI submission spreadsheets with additional columns showing the number of challenges received for each specific challenge type at each location and if a location is subject the area or MDU challenge classification.

The BEAD Challenge Map will also be updated to show types of challenges received for each BSL. The BEAD Challenge Map will display the following challenge data fields for each location: challenge type code, number of challenge types, and if an Area or MDU challenge classification applies for any challenge types at the location. The left pane of the map will have a layer for “challenged locations” that can be turned on to view only locations with challenges.

Providers who have received challenges to their service at locations (challenge types: availability, data cap, technology, and measurement) are the only entities allowed to submit a rebuttal and will be directly emailed a spreadsheet of all accepted challenges for rebuttals in the same format as the challenge submission template, with additional columns for entering rebuttal information.

Accepted challenges that are not directed at a specific provider will be compiled in a single spreadsheet in the same format as the challenge submission template, with additional columns for entering rebuttal information, and uploaded to docket 5-BCH-2024. These challenges are open for rebuttal from all eligible participants and will include the following challenge types:

- B – business service only
- P – planned service
- E – enforceable commitment
- N – not part of enforceable commitment
- C – location is a CAI
- R – location is not a CAI

Participants should review accepted challenges and determine rebuttals they will make. Providers will use the spreadsheet provided directly to them to enter rebuttal data, following the directions in the following Step 2.

Participants submitting rebuttals not directed at a service provider will use the spreadsheet uploaded to docket 5-BCH-2024 following the directions in Step 3.

## 2. **Providers only** – complete the provided service challenge rebuttal spreadsheet.

Challenges to broadband service will only be available for rebuttal to the provider being directly challenged. Challenges that only accept rebuttals from providers include the following challenge types:

- A – availability
- G – CAI: Qualifying Broadband Not Available
- Q – CAI: Qualifying Broadband Available
- D – data cap
- T – technology
- M – Pre-challenge modification rebuttal for measurement-based challenge using anonymous speed tests for locations that were modified to underserved
  - Rebuttal by provider of locations modified by measurement pre-challenge.

Following the challenge submission period, all successfully submitted challenges will be published in the BEAD Challenge list on the [Challenge Process webpage](#) and the BEAD Challenge Map will be updated. Providers that received the challenge types noted above at any locations will be provided a spreadsheet in the same format as the challenge submission template to enter data to submit rebuttals. The Service Challenge Rebuttal spreadsheet will have the following additional columns:

### Column L: Challenge # (pre-filled)

- Each unique challenge to a location will be assigned a challenge number, which will be pre-filled in Column L.

### Column M: Area or MDU Challenge (pre-filled)

- Column L will indicate if the location is a part of an Area or MDU challenge.

### Column N: Rebuttal Explanation (text input)

- Brief explanation for the rebuttal

### Column O: Rebuttal Evidence Type(s) (text input)

- Indicate the types of rebuttal evidence being provided for each location being challenged, separated by a comma (e.g. screenshot, email).
- See section 8 below for the examples of rebuttal evidence types.

### Column P: Rebuttal Evidence File(s) (text input)

- For each location, enter the name of the evidence documentation that supports the rebuttal of the location.

- The rebuttal evidence file name must align to the following naming convention: **[entity name]\_RBevidence[#].pdf**
- If the location being rebutted has more than one supporting piece of evidence, enter the evidence file names separated by a comma (e.g., *[provider name]\_rebuttal1.pdf, [provider name]\_rebuttal2.pdf*)
- An evidence document can apply to more than one location be rebutted, and can thus be listed multiple times in column M.
- **NOTE:** only .pdf files are accepted. If you are providing a screenshot or photo (.png or .jpg), paste it into a word document and save as .pdf file before uploading.

Providers will fill in column N, O, and P to complete the service rebuttal spreadsheet.

Completed BEAD Service Challenge Rebuttal spreadsheets should be saved and then upload to docket 5-BCH-2024 using the following naming convention: “[*provider name*]\_rebuttal.xlsx”. Step 4 of this appendix provides upload instructions.

If providers submitting rebuttals did not participate in the initial challenge phase, they will also need to submit the Challenge Participant Eligibility and Confidentiality Form and upload it to docket 5-BCH-2024 at the time of submission of the service rebuttal spreadsheet. The completed Eligibility and Confidentiality Form PDF file must be saved with the following naming convention: “[*entity name*]\_challengeform.pdf”.

### 3. (open to all participants) Complete the challenge rebuttal form

Successful challenges that are not directed at a specific provider will be available for rebuttal by all eligible participants and compiled in a single spreadsheet in the same format as the challenge submission template, and uploaded to docket 5-BCH-2024 for the following challenge types:

- B – business service only
- P – planned service
- E – enforceable commitment
- N – not part of enforceable commitment
- C – location is a CAI
- R – location is not a CAI (also eligible for rebuttal from CAI being challenged)
- G – CAI: qualifying broadband unavailable
- Q- CAI: qualifying broadband available

The BEAD Challenge Rebuttal spreadsheet will have the additional columns L through O (same as is) listed above, but Column M will not be applicable to these challenge types and will have ‘NA’ prefilled in these cells.

Column L: Challenge # (pre-filled)

- Each unique challenge to a location will be assigned a challenge number, which will be pre-filled in Column L.

Column M: Area or MDU Challenge (pre-filled)

- Not applicable and entries in cells will be ‘NA’.

Column N: Rebuttal Explanation (text input)

- Brief explanation for the rebuttal

Column O: Rebuttal Evidence Type(s) (text input)

- Indicate the types of rebuttal evidence being provided for each location being challenged, separated by a comma (e.g. screenshot, email).
- See section 8 below for the examples of rebuttal evidence types.

Column P: Rebuttal Evidence File(s) (text input)

- For each location, enter the name of the evidence documentation that supports the rebuttal of the location.
- The rebuttal evidence file name must align to the following naming convention: **[entity name]\_RBevidence{#}.pdf**
- If the location being rebutted has more than one supporting piece of evidence, enter the evidence file names separated by a comma (e.g., *[entity name]\_RBevidence1.pdf, [entity name]\_RBevidence2.pdf*)
- An evidence document can apply to more than 1 location be rebutted, and can thus be listed multiple times in column M.
- **NOTE**: only .pdf files are accepted. If you are providing a screenshot or photo(.png or .jpg), paste it into a word document and save as .pdf file before uploading.

Completed BEAD Challenge Rebuttal spreadsheets should be saved and then upload to docket 5-BCH-2024 using the following naming convention: ‘*[entity name]\_rebuttal.xlsx*’ Step 4 of this appendix provides upload instructions.

For eligible entities submitting rebuttals that did not submit a challenge, they must also submit the Challenge Participant Eligibility and Confidentiality Form.

The completed Eligibility and Confidentiality Form PDF file must be saved with the following naming convention: “*[entity name]\_challengeform.pdf*”.

#### **4. Submit by uploading to docket 5-BCH-2024**

- a. Navigate to the PSC’s Electronic Records Filing System and select the “Upload Document” option at the bottom of the page (see screenshot below).

**Welcome!**  
 The Electronic Records Filing (ERF) System provides for the electronic submission of filed documents and online access of these documents including those submitted in formal cases before the Commission. With ERF Commission staff receive, circulate, process and publish thousands of electronically filed documents. ERF reduces the time necessary to make decisions on proposed actions, increases public access to formal case information, and provides an easy, convenient way for utilities, applicants, and other parties to participate in the Commission's formal case process.

**Quick Single Docket Search**

Case Information

Documents

[Don't know the utility ID?](#)

[View Documents Filed in the Last 2 Days](#)

PSC REF#:

**ERF - EZ Subscriptions**

To receive e-mail notifications when new documents are filed in a docket, simply enter the docket (case) number, your e-mail address and click the Subscribe button. You can unsubscribe any time by clicking the link in the e-mail notification.

Docket ID:

Email Address:

One-Time Code:  [Send Code Now](#)

Advance Search

Upload Document

Subscription

Account Management

Confidential Determination

Help

- b. Log in to your ERF account. If you do not have an ERF account, below the log in fields, click the link “create new individual account” and complete the required fields.

[WISCONSIN.GOV](#) Agency Directory Online Services  
 Public Service Commission of WISCONSIN ERF Electronic Records Filing System  
 STATE OF WISCONSIN OCR

**Welcome** to the Public Service Commission of Wisconsin's Electronic Records Filing System (ERF).  
 ERF allows users to submit and access documents via the web. Unless otherwise directed by the PSC, all documents must be converted to a Portable Document Format (PDF) that is text searchable. When a document is submitted it is routed to our Records Management Unit staff for processing. RMU staff will review your document and notify you via email when the document is accepted. Accepted documents can be viewed at <https://apps.psc.wi.gov/pages/ERFHome.htm>.  
 For any questions regarding ERF logon IDs or passwords, please email our Records Management Unit at [PSCRecordsMail@wisconsin.gov](mailto:PSCRecordsMail@wisconsin.gov) or call 608-261-8524.

**Warning:** Your session will close if it remains inactive for an extended period of time.

**NOTE:** Telecommunications providers must use this new [filing interface](#) to upload tariffs to ERF.

**Note:** If your password is not in compliance with the new rules, we will redirect you to the change password page.

Logon ID:   
 Password:   
 Are you a robot? Check the box to prove you are human.  
 I'm not a robot reCAPTCHA Privacy - Terms  
  
[Change/Forget Password?](#) [Retrieve Logon ID](#)  
[Create New Individual Account](#)

- c. Once on the ERF upload page after logging in, from the left menu pane, select ‘public’ for uploading the challenge rebuttal file and any evidence documents that are not confidential. (see screenshot below). For information regarding submitting confidential evidence documents, see Section 9.

ERF Upload Welcome Matthew Marcus... You are logged on with your PSC staff user ID: MARCUM Thursday, January 04, 2024 1:13:29 PM

**UPLOAD DOCUMENTS**

Public

Confidential & Public Redacted

GIS Files (Public)

**CHECK UPLOADED STATUS**

Pending

Accepted

Rejected

**USER MAINTENANCE**

Change Password

Update Profile

**SUBSCRIPTION**

Subscription Profile

**UPLOAD NOTES:**

- User may upload up to 10 files. The maximum file size per file is 20mb (20,000kb).
- The system will **only** accept PDF and certain Excel formats (.PDF and .XLSX).
- No use of attachments!** Multiple short documents can be submitted as one PDF by combining pages.
- Combine multiple PDF's into one file with bookmarks for individual sections.
- Excel spreadsheets should **not** be converted to PDF, but rather filed as separate individual uploads.
- No PDF files embedded in Excel spreadsheets! **Only** exception to this is in case of confidential spreadsheets, a PDF affidavit may be embedded.
- When uploading a confidential document, the redacted copy must be uploaded at the same time.
- If filing as a party to a contested case the document to be uploaded and entries in the ERF upload screen must conform to the requirements contained in the Facilitating Matters Ordered in Contested Cases attachment to the Prehearing Conference Memorandum/Scheduling Order issued in the docket.
- Disable any security restrictions in the document properties.** See reminder below!

[ERF Help Files](#)

**REMINDER:**  
The PSC electronically timestamps all PDFs submitted in ERF. We are seeing an increase in the number of documents that cannot be stamped. Before you upload PDF files, please make sure your documents are not password protected, read only, or secured. If the document contains digital signatures, please print to PDF after signing the document to remove the protection associated with the signatures.

Document Activity Status    My Subscription List: 0

- d. On the “Upload Public Document” page, for Step 1 choose “existing docket” option, enter the docket number 5-BCH-2024, and click the “Check Docket” button.

WISCONSIN.GOV Agency Directory Online Services

Public Service Commission of WISCONSIN ERF Electronic Records Filing System STATE OF WISCONSIN OOCR

ERF Upload **Upload Public Document**

**Step 1: Specify the Docket or Utility**

- If you select option 1, you must enter the docket and click the **Check Docket** button.
- If you select option 2, you must enter the utility id and click the **Check Utility ID** button.
- Once the docket or utility id is verified you will be allowed to select files to upload.

**Choose an Option**

Existing Docket

Existing Service Provider/ New Docket Application

New Service Provider

Docket

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- e. For Step 2 you will choose the files to be uploaded and their respective document type and provide a description. The table below shows the file naming convention, document type, and description that should be used for rebuttal uploads. A screenshot following the table provides an example of what a provider’s upload selection would look like.

Document	Completed saved file naming convention	Document type selection for upload	Description for upload
<b>(Providers only)</b> BEAD Service Challenge Rebuttal Spreadsheet	<i>[provider name]_rebuttal.xlsx</i>	Data Request/Response	<i>Provider Name Rebuttal</i>
BEAD Challenge Rebuttal Spreadsheet	<i>[entity name]_rebuttal.xlsx</i>	Data Request/Response	<i>Entity Name Rebuttal</i>
BEAD Rebuttal Evidence Documents	<i>[entity/provider name]_RBevidence[#].pdf</i>	Comments	<i>Entity/Provider Name RB Evidence[#]</i>



**ERF**  
 Electronic Records Filing System




**ERF Upload**

**UPLOAD DOCUMENTS**

Public

Confidential & Public Redacted

GIS Files (Public)

**CHECK UPLOADED STATUS**

Pending

Accepted

Rejected

**USER MAINTENANCE**

Change Password

Update Profile

**SUBSCRIPTION**

Subscription Profile

  
**Logout**

**Upload Public Document**

**Step 1: Specify the Docket or Utility**

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**Choose an Option**

Existing Docket

Existing Service Provider/  
New Docket Application

New Service Provider

Docket

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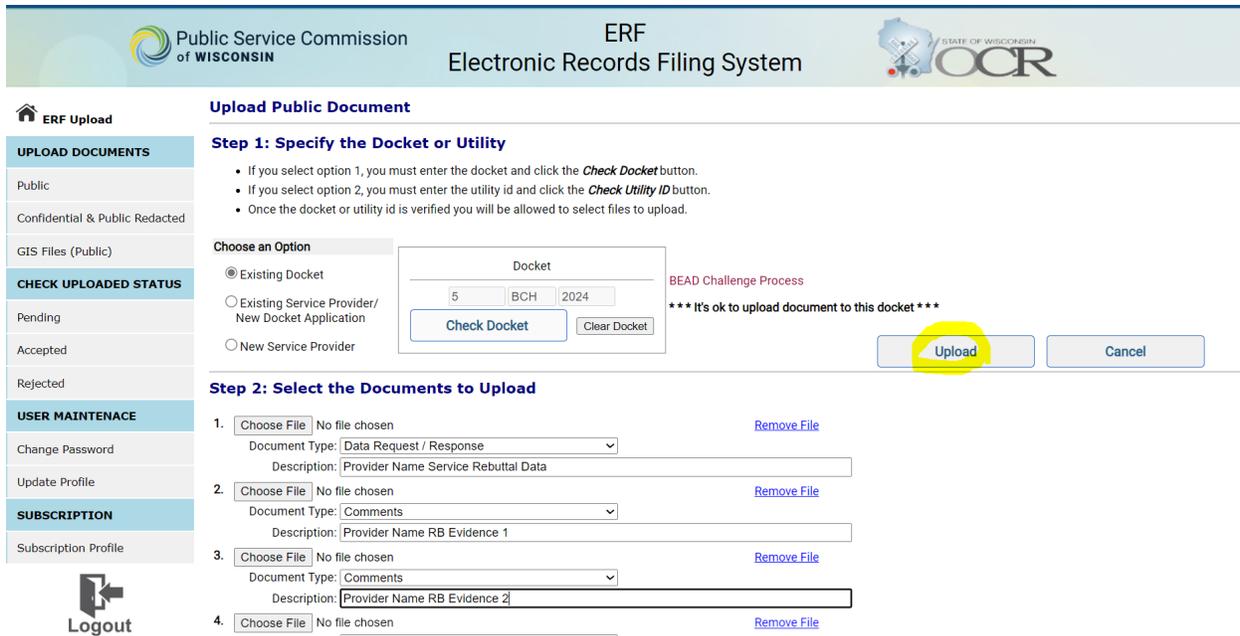
BEAD Challenge Process

\*\*\* It's ok to upload document to this docket \*\*\*

**Step 2: Select the Documents to Upload**

- No file chosen [Remove File](#)  
 Document Type: Data Request / Response  
 Description: Provider Name Service Rebuttal Data
- No file chosen [Remove File](#)  
 Document Type: Comments  
 Description: Provider Name RB Evidence 1
- No file chosen [Remove File](#)  
 Document Type: Comments  
 Description: Provider Name RB Evidence 2
- No file chosen [Remove File](#)

- f. When you have completed entering the information for all documents to be uploaded (maximum of 10 at a time), click the ‘Upload’ button. If you need to upload more evidence documents, follow the upload process again to upload remaining evidence documents.



- g. Once the documents are submitted, the documents activity status on the upload main page will be changed to pending (see screenshot below). Pending means that the document has been received by the PSC and awaits processing. Staff will review the uploaded documents and approve or reject them. When uploads are processed, the filer will be notified via email. The email will include the document name, type, description, received date, etc. If the filing was rejected, the rejection reason will be included in the email. Clicking one of the hyperlinks will produce a list of document details for each status type. If a document has been rejected, the reason for rejection is also listed among the details.

<b>UPLOAD DOCUMENTS</b>
Public
Confidential
<b>CHECK UPLOADED STATUS</b>
Pending
Accepted
Rejected
<b>USER MAINTENANCE</b>
Change Password
Update Profile
<b>SUBSCRIPTION</b>
Subscription Profile



**UPLOAD NOTES:**

- User may upload up to 10 files. The MAXIMUM file size per file is 20mb (20,000kb).
- Click the **Browse** button to select the document you would like to upload.
- If the document type is not specified, the document will not upload.
- If the document name or description is empty, the document will not upload.
- **(NEW)** If filing as a party to a contested case the document to be uploaded and entries in the ERF upload screen must conform to the n Facilitating Matters Ordered in Contested Cases attachment to the Prehearing Conference Memorandum/Scheduling Order issued in the
- When uploading a confidential document, the redacted copy must be uploaded at the same time.
- The system will only accept PDF and certain Excel file formats (.PDF, .XLS, and .XLSX).

[Additional Policies for Filing ERF document](#)

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**Document Activity Status**

<a href="#">Pending</a>	1
<a href="#">Accepted</a>	457
<a href="#">Rejected</a>	6

**My Subscription List: 0**