

The Arkansas BEAD Program

Technical Assistance

JUNE 6, 2025



Agenda for the session today

- 1 What is the purpose of the true up process?
- 2 What are the key activities and deadlines for the true up process?
- 3 What information do I need to collect and submit?

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The Arkansas BEAD Program will facilitate a true up process to identify any “No-BEAD” locations according to the process set forth in the BEAD NOFO

Purpose of true up process

There may be **rare cases** where a provider opts to identify BEAD eligible **locations within their preliminarily selected project area(s) as not requiring broadband service or already being served** through an enforceable commitment or non-subsidized service

These locations are referred to as **"No-BEAD"** locations

Non-service codes

In these cases, providers will have the option to use non-service codes to explain **why these BEAD-eligible locations will not be served by a BEAD project**

Non-service codes are a set of **7 unique codes** used to **specify the reason** why a location on the final list of BEAD-eligible BSLs from the approved challenge process results will **not be included** in a BEAD project






Supporting evidence

To use a non-service code, providers must provide evidence for each location in their **"No-BEAD" list** to prove that each location **meets the criteria of one of the reason codes**

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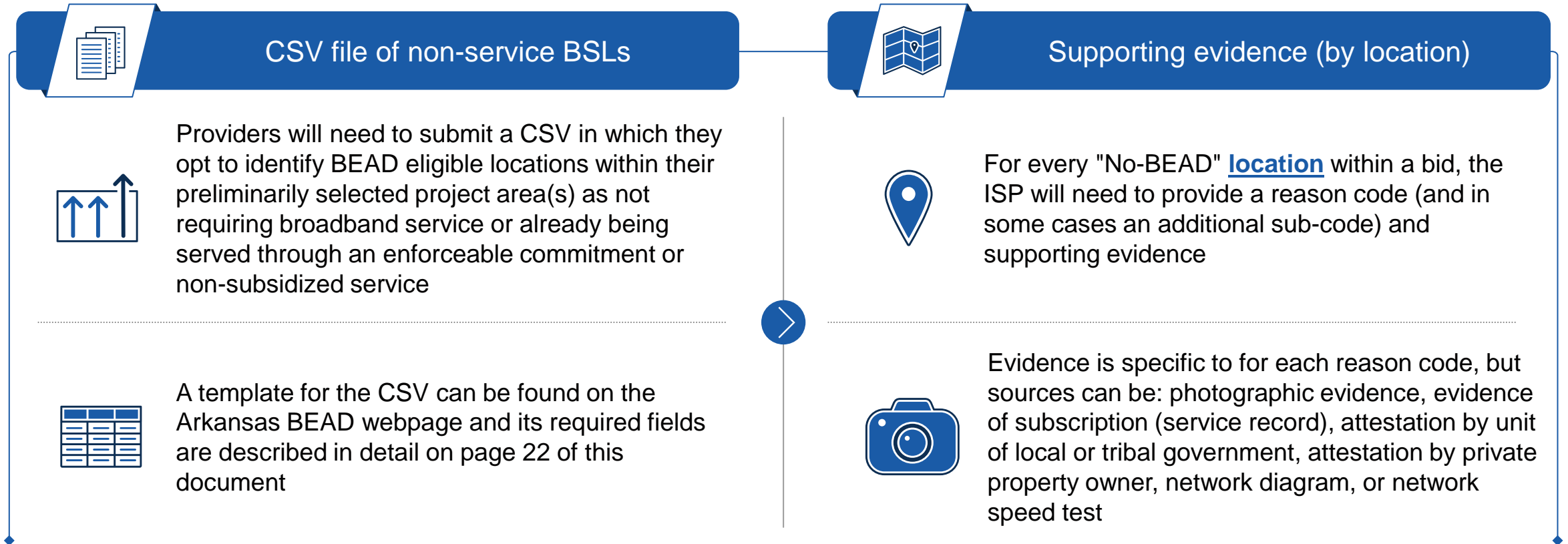
True-up | Overview of key activities and timeline

Activity	Medium(s)	Timeframe
 True up process submission window opens; ISPs may submit No-BEAD rosters and supporting evidence for their preliminarily selected bids to ARGrants@Mbakerintl.com	<ul style="list-style-type: none">• TA session• Public notice• Email	Friday, June 6
 True up process submission window closes	<ul style="list-style-type: none">• Excel• Public notice• Email	Thursday, June 26 6pm CT
 Review of true up process submissions	<ul style="list-style-type: none">• Excel	1-2 Weeks
 Revision requests sent to remove approved No-BEAD locations from preliminarily selected project areas	<ul style="list-style-type: none">• Grantor Portal	1 Day
 Accept revision requests in Grantor Portal to formally submit and finalize bid modifications	<ul style="list-style-type: none">• Grantor Portal	3-5 Days

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- 2 What are the key activities and deadlines for the true up process?
- 3 What information do I need to collect and submit?

No BEAD submission | The AR BEAD Program true up process will require submission of a CSV file of non-service BSLs and supporting evidence




No-BEAD CSV and evidence submissions are due to ARGrants@Mbakerintl.com by Thursday, June 26 at 6 pm CT


No-BEAD submission | Non-service codes

- 1


No Broadband Connection
Locations should not have a broadband connection (e.g., barn, hay bale, rock)


- 2


No Demand for Mass-Market Broadband Service
Location does not need mass-market broadband service due to the nature of internet use (e.g., the entity located at the BSL requires enterprise service)


- 3

Removal from FCC's Fabric
Location has been removed from the latest version of the FCC Fabric


- 4


Enforceable Commitment
Location will be served through an enforceable commitment (EC) that was not deduplicated during the challenge process


- 5

Served by Non-Subsidized Service
Location is already served by non-subsidized service (e.g., a network built by an ISP with private funds). The current FCC National Broadband Map must depict currently available qualifying broadband service at the location
- 6

Other Reasons
Any other reasons that are not listed
- 7

Insufficient Funds
The Eligible Entity is financially incapable of serving an underserved location





Reason code requires a sub-code



ARConnect will **not** accept reason code from ISP

No-BEAD submission | Sub-codes for non-service codes 1, 2, and 4

1

No Broadband Connection

Location should not have a broadband connection (e.g., bar, hay bale, or rock).
ISPs must provide a Non-BSL sub-code

- **D:** Location has been demolished and is not expected to be rebuilt
- **B:** Location is no longer habitable
- **U:** Location is a support structure (e.g., a garage, parking structure, barn, silo, storage shed, etc.) to a nearby building
- **M:** Location is intended to be mobile and has not been permanently installed in its current location (e.g., it is an RV or boat)
- **R:** Location is a natural formation such as a rock or something assembled but not serviceable such as a collection of hay bales
- **Z:** Location is not serviceable for another reason

☆ ARConnect will not accept sub-code from ISPs

2

No Demand for Mass-Market Broadband Service

Location does not need mass-market broadband service due to the nature of internet use. **ISPs must provide the Location Type sub-code**

- **E:** Enterprise location
- ☆ **C:** CAI location
- **P:** Government property

4

Enforceable Commitment

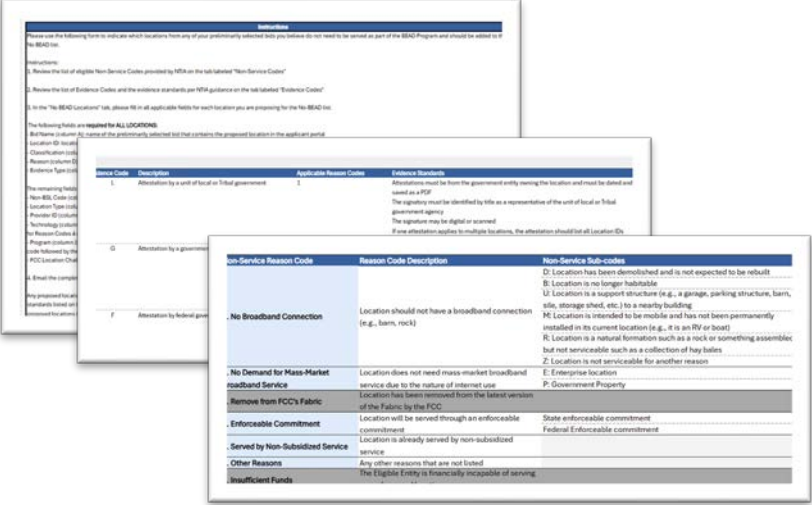
Locations will be served through an enforceable commitment announced after challenge results submission to NTIA. **ISPs must provide the type of enforceable commitment (EC)**

- **State EC:** State-administered/consulted program (even if federally funded) or a state-funded program
- **Federal EC (select from list):** Federal program directly awarding grant or support to entity responsible for deployment:
 - BIP
 - CAFII
 - CCGP
 - CPF
 - EACAM
 - RDOF
 - ReConnect
 - SLFRF
 - TBCP1
 - TBCP2

No-BEAD submission | The template CSV file provides all necessary information to submit proposed No BEAD locations and supporting evidence

Supplemental Information

Three tabs with detailed instructions for how to fill in the template as well as guidance and standards for reason codes, sub-codes, and evidence

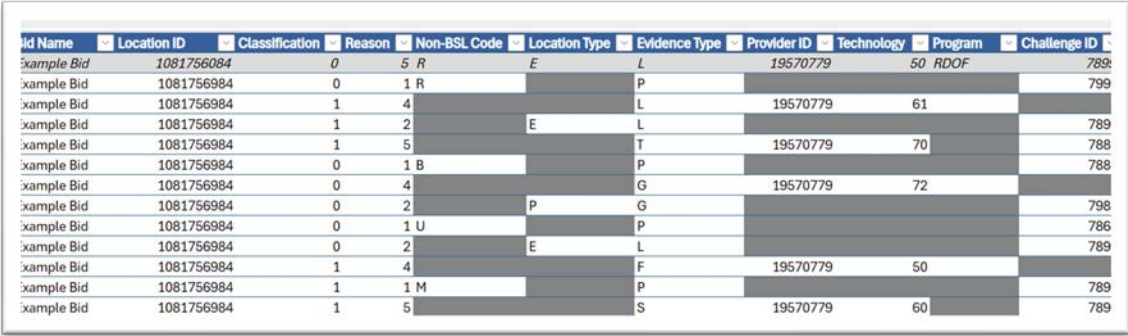


No BEAD Locations Form

Form to input proposed No-BEAD locations and required information
Required fields include:







- Bid Name
- Classification (unserved or underserved)
- Reason Code
- Evidence Code

Note, other fields will be necessary depending on the reason code provided. Cells not requiring data entry for the given reason code will be grayed out.



Please refer to the appendix starting on page 22 for detailed descriptions of the necessary fields.

No BEAD submission | Additional fields will be required depending on the reason code provided for a location

	Additional Field	Description	Applicable Reason Code(s)
	Non-BSL Code	Sub-code for Reason Code 1	1
	Location Type	Sub-code for Reason Code 2	2
	Provider ID	Unique 6-digit generated by the FCC for the service provider	4, 5
	Technology	Indicates the type of technology to be deployed to the location	4, 5
	Program	Sub-code for Reason Code 4	4
	Challenge ID ¹	Indicates the challenge identifier for the location challenge submitted the FCC	1, 2, 5 ²

Please refer to the appendix starting on page 22 for detailed descriptions of the necessary fields.









1. Providers proposing a location for the No BEAD list under reason codes 1 and 2 should also file a challenge with the FCC and provide ARConnect with the Challenge ID.
2. Current NTIA guidance on whether a Challenge ID is required for Reason Code 5 is mixed. However, based on the description of Reason Code 5 on page 44 of the [Final Proposal Guidance 1.2](#), ARConnect does not believe a Challenge ID is required under Reason Code 5.

No-BEAD submission | Providers must provide relevant evidence to substantiate the reason codes provided in their No-BEAD submission

Why is evidence needed?

- ✓ **Evidence Objective** | The evidence should prove that the location does not need BEAD funds to avoid leaving locations un/underserved by mistakenly including them in the **No-BEAD Locations** CSV.
- ✓ **Standard of Evidence** | The evidence must be clear and precise as to how the relevant reason code is substantiated (see [*FP Guidance 1.2*](#) for minimum evidentiary standards).
- ✓ **Possible Denial of Reason** | If the EE cannot maintain evidence that upholds these standards, or does not want to maintain such evidence, it should not include the locations in question in the **No-BEAD Locations** CSV.

What evidence may be used?

Code	Type of Evidence	Applicable Reason Code(s)
 P	Photographic Evidence	1,2,5
 L	Attestation by Unit of Local or Tribal Government	1
 G	Attestation by Government Entity Owning Location	1, 2
 F	Attestation by Federal Government Agency	2
 O	Attestation by Private Property Owner	1, 2
 S	Evidence of Subscription (Service Record)	5, 2
 N	Network Diagram	5
 T	Network Speed Test	5

Appendix | Acceptable forms of evidence for each reason code and sub-code

No-BEAD submission | Acceptable evidence for each reason code and sub-code (I/IV)

Reason Code	Sub-Code	Evidence Objectives	Evidence Examples
1. Location should not have a broadband connection	D: Location has been demolished and is not expected to be rebuilt	Evidence must demonstrate that the location is not a business or residential location at which fixed broadband Internet access service is, or can be, installed and there in a demand for such service	<ul style="list-style-type: none"> • Attestation from unit of government or property owner (e.g., zoning or land use change) • Photographic evidence • FCC location challenge ID (Type 6)
	B: Residential location is not habitable		<ul style="list-style-type: none"> • Attestation from unit of government or property owner • FCC location challenge ID (Type 6)
	U: Location is a support structure (e.g., a garage, parking structure, barn, silo, Murage shed) to a nearby building		<ul style="list-style-type: none"> • Attestation from unit of government or property owner • Photographic evidence • FCC location challenge ID (Type 6)
	M: Location is intended to be mobile and has not been permanently installed in its current location (e.g., it is an RV or boat)		<ul style="list-style-type: none"> • Attestation from property owner • Photographic evidence • FCC location challenge ID (Type 6)
	R: Location is not a building but a land or natural formation, such as a large rock or collection of hay bales		<ul style="list-style-type: none"> • Attestation from property owner • Photographic evidence • FCC location challenge ID (Type 6)
	Z: Location is not serviceable for another reason		<ul style="list-style-type: none"> • Evidence not specified; to be collected as applicable to the reason • FCC location challenge ID (Type 6)

Note | ISPs do not need to submit all types of evidence listed for each reason code or sub-code

No-BEAD submission | Acceptable evidence for each reason code and sub-code (II/IV)

Reason Code	Sub-Code	Evidence Objectives	Evidence Examples
2. Location does not need mass-market broadband service due to the nature of use	☆ C: CAI location	Evidence must demonstrate that the location does not have a demand for mass-market broadband service	<ul style="list-style-type: none"> Attestation unit of government or property owner Photographic evidence clearly showing the nature and use of the location FCC location challenge ID (Type 4)
	E: Enterprise location		<ul style="list-style-type: none"> Attestation from unit of government or property owner Photographic evidence clearly showing the nature and use of the location FCC location challenge ID (Type 4)
	P: Government property		<ul style="list-style-type: none"> Attestation from unit of government or property owner Photographic evidence clearly showing the nature and use of the location FCC location challenge ID (Type 4, referring to the location as either a CAI or an enterprise)
☆ 3. Location has been removed from the latest version of the fabric by the FCC	N/A	Evidence that the location is no longer on the latest version of the Fabric	<ul style="list-style-type: none"> Version of the Fabric referenced

Note | ISPs do not need to submit all types of evidence listed for each reason code or sub-code

Source: [Final Proposal Guidance 1.2](#)


☆ ARConnect will **not** accept reason code or sub-code from ISP

No-BEAD submission | Acceptable evidence for each reason code and sub-code (III/IV)

Reason Code	Sub-Code	Evidence Objectives	Evidence Examples
4. Location is already served by an enforceable commitment	State enforceable commitment	Evidence must demonstrate that the location is already served, or planned to be served, with qualifying broadband	<ul style="list-style-type: none"> Name of the state grant program The Eligible Entity attests in the Final Proposal that it has properly accounted for state enforceable commitments
	Federal enforceable commitment (BIP, CAFII, CPF, EACAM, RDOF, RECONNECT, SLFRF, TBCP1, TBCP2)		<ul style="list-style-type: none"> Name of the federal grant program NTIA to validate through collaboration with other federal agencies
5. Location is already served by non-subsidized service (privately funded network)	N/A	Only for locations with qualifying broadband service in the current National Broadband Map. Evidence must unequivocally demonstrate that the location is already served with qualifying broadband (is currently connected or can be connected within 10 business days of a request with a standard installation fee)	<ul style="list-style-type: none"> Evidence of subscription (service record) Photographic evidence of infrastructure Network diagram Speed test Attestation from the provisional awardee that it concurs to not accept a BEAD project for the location(s)
6. Other	N/A	Evidence must demonstrate that the location is not a broadband serviceable location, is already or plans to be served, or otherwise does not have demand for broadband service for a reason that does not meet one of the reasons described above	<ul style="list-style-type: none"> Evidence not specified; to be collected as applicable to the reason. There will be a high bar for this category; the Eligible Entity is encouraged to discuss these locations as early as possible with NTIA and establish evidence standards


Note | ISPs do not need to submit all types of evidence listed for each reason code or sub-code

No-BEAD submission | Acceptable evidence for each reason code and sub-code (IV/IV)

Reason Code	Sub-Code	Evidence Objectives	Evidence Examples
 7. The Eligible Entity is financially incapable of serving an underserved location	N/A	The Eligible Entity must demonstrate, through its overall Final Proposal submission, that it provisionally selected deployment subawards in a manner that prioritizes priority broadband service to the most locations possible and prioritized serving unserved locations first	<ul style="list-style-type: none">• Evidence incorporated throughout Final Proposal submission

Note | ISPs do not need to submit all types of evidence listed for each reason code or sub-code

Source: [Final Proposal Guidance 1.2](#)

 ARConnect will **not** accept reason code from ISP

Appendix | Minimum requirements for each evidence type

No-BEAD submission | Minimum standards for evidence submission

Evidence	Minimum Standards
Photographic Evidence	Photographic evidence must be a JPEG file, timestamped and geocoded with two decimal digits resolution for the seconds part of longitude and latitude. The photo should show a terrestrial (street-level) view. Only if the Eligible Entity is restricted from accessing the location, it may rely on aerial or satellite images but needs to justify why terrestrial photographic evidence could not be collected
Attestation by a Unit of Local or Tribal Government, Federal Government Agency, or Other Government Entity	An attestation by a unit of local or Tribal government, agency of the federal government, or other government entity owning the location must be dated and retained as a PDF file. Attestations for locations on Tribal Lands must be made by a representative of the Tribal government. The signatory must be identified by title as a representative of the unit of local or Tribal government or federal government agency. The signature may be either digital or scanned. If a single attestation applies to multiple locations, the attestation should list all Location IDs
Attestation by Private Property Owner	An attestation by a private property owner should be retained as a PDF file. It should contain a date and a digital or scanned signature. If a single attestation applies to multiple locations, it should list all street addresses or Location IDs
Land use or zoning change	Documentation of a land use or zoning change should include an attestation by a unit of government for the jurisdiction
Evidence of Subscription (Service Record)	Evidence of subscription must be preserved as a PDF file and must contain a date. Any personally identifiable information should be redacted. The evidence of subscription should indicate the service address, service provider, the technology type, and the speed tier
Network Diagram	A network diagram should include an attestation by an officer of the provider
Network Speed Test	The speed test results can be recorded in a PDF or CSV file. Speed tests can use any of the applications named in NTIA Model Challenge Process or the Eligible Entity's Initial Proposal Volume I

Appendix | Format and template of No-BEAD CSV

No-BEAD submission | Submission format and template (I/IV)

Column Name	Data Type	Example	Description														
location_id	string {13}	1081756084	Location ID: unique identifier for the location, as used in the Broadband Serviceable Location Fabric														
classification	Enumerated {0, 1}	0	Location Classification: indicate the category classifying the location as unserved (0) or underserved (1) from the approved Challenge Process location list														
reason	string {1}	5	Reason: indicate the reason for no BEAD funded service: <table><tr><td>1</td><td>location should not have broadband service</td></tr><tr><td>2</td><td>location does not need mass-market broadband service</td></tr><tr><td>3</td><td>location has been removed from the Fabric by the FCC (or listed as BSL = FALSE)</td></tr><tr><td>4</td><td>location is already served by an enforceable commitment</td></tr><tr><td>5</td><td>location is already served by non-subsidized service (privately funded network)</td></tr><tr><td>6</td><td>other</td></tr><tr><td>7</td><td>insufficient funds</td></tr></table>	1	location should not have broadband service	2	location does not need mass-market broadband service	3	location has been removed from the Fabric by the FCC (or listed as BSL = FALSE)	4	location is already served by an enforceable commitment	5	location is already served by non-subsidized service (privately funded network)	6	other	7	insufficient funds
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6	other																
7	insufficient funds																
non_bsl_code	string {1}	R	Non BSL Code: indicate the non BSL reason for reason '1': <table><tr><td>D</td><td>location has been demolished and is not expected to be rebuilt</td></tr><tr><td>B</td><td>residential location is not habitable</td></tr><tr><td>U</td><td>location is a support structure (e.g., a garage, parking structure, barn, silo, storage shed) to a nearby building</td></tr><tr><td>M</td><td>location is intended to be mobile (e.g., it is an RV or boat)</td></tr><tr><td>R</td><td>location is not a building but a land formation, such as a large rock or collection of hay bales</td></tr><tr><td>Z</td><td>location is not serviceable for another reason</td></tr></table> <i>Leave empty for all other reason codes</i>	D	location has been demolished and is not expected to be rebuilt	B	residential location is not habitable	U	location is a support structure (e.g., a garage, parking structure, barn, silo, storage shed) to a nearby building	M	location is intended to be mobile (e.g., it is an RV or boat)	R	location is not a building but a land formation, such as a large rock or collection of hay bales	Z	location is not serviceable for another reason		
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No-BEAD submission | Submission format and template (II/IV)

Column Name	Data Type	Example	Description																														
location_type	string {1}	E	Location Type: indicate the type of building or location that does not subscribe to mass-market broadband for reason '2': <table><tr><td>E</td><td>enterprise</td></tr><tr><td>C</td><td>CAI</td></tr><tr><td>P</td><td>government property</td></tr></table> <i>Leave empty for all other reason codes</i>	E	enterprise	C	CAI	P	government property																								
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evidence_type	string {1}	L	Type of Evidence: indicate type of evidence collected for reasons '1,' '2,' and '5': <table><tr><th>Code</th><th>Nature of Evidence</th><th>Applicable Reason Code(s)</th></tr><tr><td>L</td><td>attestation by unit of local or Tribal government</td><td>1</td></tr><tr><td>G</td><td>attestation by government entity owning location</td><td>1, 2</td></tr><tr><td>F</td><td>Attestation by federal government agency</td><td>2</td></tr><tr><td>P</td><td>photographic evidence</td><td>1, 2, 5</td></tr><tr><td>S</td><td>evidence of subscription (service record)</td><td>5, 2</td></tr><tr><td>N</td><td>network diagram</td><td>5</td></tr><tr><td>O</td><td>attestation by private property owner</td><td>1, 2</td></tr><tr><td>T</td><td>network speed test</td><td>5</td></tr><tr><td>X</td><td>other evidence</td><td>1, 2, 4, 5</td></tr></table> If there are multiple types of evidence, separate by space and list alphabetically. <i>Leave empty for all other reason codes</i>	Code	Nature of Evidence	Applicable Reason Code(s)	L	attestation by unit of local or Tribal government	1	G	attestation by government entity owning location	1, 2	F	Attestation by federal government agency	2	P	photographic evidence	1, 2, 5	S	evidence of subscription (service record)	5, 2	N	network diagram	5	O	attestation by private property owner	1, 2	T	network speed test	5	X	other evidence	1, 2, 4, 5
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provider_id	string {10}	0019570779	Provider ID: a unique 6-digit code generated by the FCC that identifies each service provider Only applicable for reason codes '4' and '5'. <i>Leave empty for all other reason codes</i>																														

No-BEAD submission | Submission format and template (III/IV)

Column Name	Data Type	Example	Description																					
technology	integer {2}	50	<p>Technology: indicate the type of technology to be deployed for service to the location, using the FCC Broadband Data Collection technology codes, for reasons '4' and '5':</p> <table><tr><td>0</td><td>Other technology</td></tr><tr><td>10</td><td>Copper Wire</td></tr><tr><td>40</td><td>Coaxial Cable / HFC</td></tr><tr><td>50</td><td>Optical Carrier / Fiber to the Premises</td></tr><tr><td>60</td><td>Geostationary Satellite</td></tr><tr><td>61</td><td>Non-Geostationary Satellite</td></tr><tr><td>70</td><td>Unlicensed Terrestrial Fixed Wireless</td></tr><tr><td>71</td><td>Licensed Terrestrial Fixed Wireless</td></tr><tr><td>72</td><td>Licensed by-Rule Terrestrial Fixed Wireless</td></tr></table> <p>If multiple, select only one technology. If any of the multiple technologies do not meet the BEAD NOFO definition for reliable broadband, the Eligible Entity must list that technology. <i>Leave empty for all other reason codes</i></p>	0	Other technology	10	Copper Wire	40	Coaxial Cable / HFC	50	Optical Carrier / Fiber to the Premises	60	Geostationary Satellite	61	Non-Geostationary Satellite	70	Unlicensed Terrestrial Fixed Wireless	71	Licensed Terrestrial Fixed Wireless	72	Licensed by-Rule Terrestrial Fixed Wireless			
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program	string	RDOF	<p>Enforceable Commitment Program: denote the enforceable commitment program name for reason '4'. If it's a federal program, enter the program acronym:</p> <table><tr><th>Program</th><th>Federal Agency</th><th>Program Name</th></tr><tr><td>BIP</td><td>NTIA</td><td>Broadband Infrastructure Program</td></tr><tr><td>CAFII</td><td>FCC</td><td>Connect America Fund Phase II</td></tr><tr><td>CCGP</td><td>USDA</td><td>Community Connect Grant Program</td></tr><tr><td>CPF</td><td>US Dept. of Treasury</td><td>Capital Projects Fund</td></tr><tr><td>EACAM</td><td>FCC</td><td>Enhanced Alternative Connect America Cost Model</td></tr><tr><td>RDOF</td><td>FCC</td><td>Rural Digital Opportunity Fund</td></tr></table>	Program	Federal Agency	Program Name	BIP	NTIA	Broadband Infrastructure Program	CAFII	FCC	Connect America Fund Phase II	CCGP	USDA	Community Connect Grant Program	CPF	US Dept. of Treasury	Capital Projects Fund	EACAM	FCC	Enhanced Alternative Connect America Cost Model	RDOF	FCC	Rural Digital Opportunity Fund
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No-BEAD submission | Submission format and template (IV/IV)

Column Name	Data Type	Example	Description		
program	string	RDOF	RECONNECT	Rural Utilities Service	Rural EConnectivity Program (ReConnect)
			SLFRF	US Dept. of Treasury	State and Local Fiscal Recovery Fund
			TBCP ₁	NTIA	Tribal Broadband Connectivity Program NOFO ₁
			TBCP ₂	NTIA	Tribal Broadband Connectivity Program NOFO ₂
			<p><i>Note:</i> the table only lists programs that are currently awarding new projects, have awarded locations to Alternative Technologies (and have measurement obligations), or are modifying projects by adding locations.</p> <p>If it's a state program, enter the state postal code followed by the program name (e.g., LA-GUMBO).</p> <p><i>Leave empty for all other reason codes</i></p>		
fabric	integer	4	<p>Fabric Version: version identifier of the Broadband Serviceable Location Fabric. For example, the December 2023 Fabris is version 4. Only applicable for reason code '3'. <i>Leave empty for all other reason codes</i></p>		
challenge_ id ¹	integer	7899	<p>FCC Location Challenge ID: the challenge identifier for the location challenge submitted to the FCC.</p> <p>Only applicable for reason codes '1,' '2,' and '5'². <i>Leave empty for all other reason codes</i></p>		
notes	string	The landowner refused access to their land.	<p>Notes: if needed, additional notes explaining why the location should not receive service through a BEAD project. Do not include linebreaks.</p> <p>Only applicable for reason codes '1' and '6'. <i>Leave empty for all other reason codes</i></p>		

1. Providers proposing a location for the No BEAD list under reason codes 1 and 2 should also file a challenge with the FCC and provide ARConnect with the Challenge ID.

2. Current NTIA guidance on whether a Challenge ID is required for Reason Code 5 is mixed. However, based on the language on page 44 of the [Final Proposal Guidance 1.2](#), ARConnect does not believe a Challenge ID is required under Reason Code 5.

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