



Non-BEAD CAI Submission Instructions

Introduction

To ensure the most effective administration of federal Broadband Equity, Access, and Deployment (BEAD) funds and per [National Telecommunications and Information Administration \(NTIA\) guidance](#), the Puerto Rico Broadband Program (PRBP) will allow evidence that Community Anchor Institution (CAI) locations misidentified as eligible broadband serviceable locations should be removed from any BEAD-funded projects. CAI locations that already receive 1 Gigabit per second (Gbps) synchronous service may be deemed non BEAD-eligible CAI locations. Validated non BEAD-eligible CAI locations will be removed from consideration in Puerto Rico's Final Proposal.

Stakeholders must follow the submission instructions outlined in this document. If you have questions regarding this process, please contact info@smartisland.pr.gov.

Eligible Participants

PRBP will accept location data from any of the following participants:

- Internet service providers and telecommunications carriers
- Local and regional governments
- State agencies
- Nonprofits

PRBP may also engage in independent data collection to identify CAI locations that should not be served by BEAD.

Submission Timeline

Eligible participants should submit locations and evidence to PRBP before November 6, 2025, or they may not be excluded in Puerto Rico's Final Proposal due to the public comment period and revision requirements for the Final Proposal.



Evidence Collection and Submission Process

To ensure that the non-BEAD-eligible CAI locations are correctly identified and adequately supported by evidence, eligible participants will:

1. Develop a list of locations they deem to be non-BEAD CAI locations, along with the relevant reason code and sub-code found in the table below for each location
2. Collect relevant evidence for each location, based on the selected reason code and sub-code for that location
3. Format the evidence for each location according to the best practices identified by NTIA
4. Submit:
 - a. The list of locations and the associated evidence to PRBP using the designated data templates and online data collection tool
 - b. Challenges to the Federal Communications Commission (FCC) for any CAI locations co-located with a BSL and therefore has a location ID if they are still showing as unserved/underserved on the latest version of the FCC National Broadband Map to designate them as served or remove them.

PRBP will review the submitted locations and evidence to determine whether any additional evidence is required from the submitter to verify the status of the location. If additional evidence is required, PRBP will notify the submitter.

Eligible Reason Codes

All submitted CAI locations must adhere to specific coding conventions. To reduce the likelihood of frivolous or inaccurate submissions, PRBP will only accept locations with the following reason codes and sub-codes:

Locations that are submitted using reason code 5 should be submitted by either the relevant internet service provider or the local government to ensure that the service is present and/or available. A location coding template with instructions for each type of eligible reason code and sub-code will be provided for participants to complete and upload in the data collection tool.



Reason code	Sub-code
1. CAI location should not have a broadband connection	D: CAI location has been demolished and is not expected to be rebuilt
	B: CAI location is not habitable
	U: CAI location is a support structure (e.g. a garage, parking structure, barn, silo, storage shed) to a nearby building
	M: CAI location is intended to be mobile and has not been permanently installed in its current location (e.g. it is an RV or a boat)
	R: CAI location is not a building but a land or natural formation, such as a large rock or collection of hay bales
2. Not Applicable	
3. Location has been removed from the latest version of the Fabric by the FCC	N/A
4. Location is already served by an enforceable commitment	State enforceable commitment
	Federal enforceable commitment (BIP, CAFII, CPF, EACAM, RDOF, RECONNECT, SLFRF, TBCP1, TBCP2, Uniendo a Puerto Rico Fund)
5. Location is already served by non-subsidized service (privately funded network)	N/A



Evidence Instructions

Evidence must be submitted for each location identified as a non-BEAD CAI location. All evidence must be readable, relevant, and dated after June 1, 2025. Evidence must support the delivery or availability of 1 Gbps service. PRBP reserves the right to validate any evidence submitted.

To ensure that the evidence indisputably demonstrates that the location meets the non-BEAD-eligible CAI criteria the following minimum standards for different types of evidence must be met:

- **Photographic Evidence:** Photographic evidence must be a JPEG file, timestamped and georeferenced with coordinates in decimal degrees to an accuracy of at least five decimal places (e.g., 18.46410,-66.11465). The photo should show a terrestrial (street-level) view. Only if the submitter is restricted from accessing the location, they may rely on aerial or satellite images but need to justify why terrestrial photographic evidence could not be collected.
- **Attestation by a Unit of Local or Tribal Government:** 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. 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 CAI locations.
- **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 CAI locations.
- **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, technology type, and speed tier.



- **Network Diagrams and Network Drawings:** A network diagram and network drawings should include an attestation by an officer of the provider.

In accordance with NTIA and FCC requirements, claims of service availability means that the ISP can provide 1 Gbps synchronous service within 10 days of a service order and at a reasonable cost. If an ISP is claiming service availability, but does not have the related CAI under a service contract, the ISP must submit the following:

- A narrative description of the network architecture that would be used to deliver services. The narrative should include the type of network (i.e. Fixed Wireless (FW) using licensed technology (including frequency being used), Fiber to the premises (FTTP) using XGS PON, LEO satellite service, etc.) and an estimate of the anticipated installation cost to the subscribing CAI.
 - For FTTP: mapping of the fiber network showing location and description of the fiber to be used for service (i.e. 24 count fiber, 12 strands in use), over subscription ratios, splitter configuration and locations, central office and amplifier/repeater cabinet locations. Also include speed test results of nearby serviced locations or similar and a description of the backhaul to be utilized and any other information that will allow PRBP to validate your claim that 1 Gbps synchronous service is available.
 - For FW: mapping showing tower locations to be utilized for service. Also include details for the tower radio or microwave equipment, CPE and base station equipment. Also include a description of the backhaul to be utilized including purchased and available capacity, heat mapping showing the CAI location(s) and network capability (include a description of tree cover and elevation used for the mapping), over subscription ratios and any other information that will allow PRBP to validate your claim that 1 Gbps synchronous service is available.
 - For LEO satellite service: a description of the equipment to be used for sending and receiving 1 Gbps speeds, including details of the equipment capabilities for both upload and download, restrictions on beam coverage due to terrain and tree cover variables and any allowances provided for correction, congestion impact and its management, impacts of atmospheric conditions and its



management and any other information that will allow PRBP to validate your claim that 1 Gbps synchronous service is available.

- **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. ([BEAD Final Proposal Guidance](#), page 45-46).

Participants must submit a list of the relevant CAI locations, using the provided csv template, along with evidence for each location on the list through PRBP's Non-BEAD Location Evidence submission form. All evidence submitted must support the claim of 1Gbps synchronous broadband service.

All evidence submitted must adhere to the minimum standards appropriate for the type of evidence and be relevant to the specific reason code selected for the location, as follows:

Reason Code	Acceptable Evidence Types
1. CAI location should not have a broadband connection	L: Attestation by unit of local or Tribal government
	G: Attestation by government entity owning location
	P: Photographic evidence
	O: Attestation by private property owner
2. Not Applicable	
3. CAI location has been removed from the latest version of the Fabric by the FCC	Version identifier for BSL Fabric referenced
4. CAI location is already served by an enforceable commitment	Identify state enforceable commitment program
	Identify federal enforceable commitment (BIP, CAFII, CPF, EACAM, RDOF, RECONNECT, SLFRF, TBCP1, TBCP2, BPRTF, Uniendo a Puerto Rico Fund)
5. CAI location is already served by non-subsidized service (privately funded network)	S: Evidence of subscription (service record)
	N: Network diagram and Network Drawings
	T: Network speed test



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Evidence Submission Instructions

Using PRBP's Non-BEAD Location Evidence submission form, participants must submit:

1. List of the relevant locations using the provided "CAI List" template
2. Description of the evidence for each location
3. Evidence for each location

All evidence submitted must support the claim of 1Gbps synchronous broadband service.