Published November 24, 2026

Virginia Office of Broadband

Broadband Equity, Access, and Deployment (BEAD) Program

Policy Notice on Virginia's Supplemental Deployment Challenge Process

Introduction

The National Telecommunications and Information Administration (NTIA) has provided the Commonwealth of Virginia's Office of Broadband (VA OoB) with a supplemental list of locations eligible for BEAD funding in a second round of deployment. The Office of Broadband has reviewed the list and removed locations with existing state funding and has published the rest for public review and challenge consistent with NTIAs BEAD Supplemental Deployment Policy Notice (SDPN). The list of locations can be found at this link on the Virginia Open Data Portal.

Process

Eligible organizations will be able to challenge locations in this list as already receiving qualifying broadband service or having qualifying broadband service planned by September 3, 2027. Organizations eligible to participate in the Supplemental Deployment Challenge Process are broadband service providers, units of local government, and nonprofit organizations. Challengers are required to submit evidence detailed below for their challenges to be considered by the Office of Broadband. Challengers will have 45 days to submit challenges to the Supplemental Deployment Eligibility Locations beginning December 1st and ending at 11:59pm on Friday, January 14, 2027. Submissions will be accepted only in the Virginia Supplemental BEAD Locations Challenge Portal. There will be no rebuttal process.

Please be advised that, per federal rules governing this process, no locations can be added to the list of eligible locations through this process. Thus, challenges submitted under this process may only be submitted to remove locations from eligibility under this process.

Challenge and Evidence Requirements

Challenges are being accepted on the following bases:

- Locations should not have broadband service (Reason Code 1)
    - Subcode D: Location has been demolished and is not expected to be rebuilt.
    - Subcode B: Residential location is not habitable.

    - Subcode U: Location is a support structure (e.g., a garage, parking structure, barn, silo, or storage shed) associated with a nearby building.
    - Subcode M: Location is intended to be mobile (e.g., an RV or boat).
    - Subcode R: Location is not a building but a land formation, such as a large rock or collection of hay bales.
- Locations with existing broadband service (Reason Code 5)
- Locations with planned service that will be active before September 3, 2027 (Reason Code 6)

Successful challenges must demonstrate that:

- BEAD-qualifying service exists currently or will exist by September 3, 2027 (12 months from the date of publication of the NTIA Supplemental Deployment Policy Notice).
- Service must provide actual (not advertised) speeds of 100mbps download and 20mbps upload.
- Service must have less than 100ms latency from the nearest FCC-designated Internet Exchange Point.
- Service must meet definition of BEAD standard installation, defined as service able to be made available within 10 business days without any additional charges.
- Service must be available with an approved technology type (tech codes 10, 40, 50, 61, 70, 71, 72).

Challenged locations must be uploaded to the Virginia Supplemental BEAD Locations Challenge Portal before 11:59pm on January 14, 2027. Challenges must be uploaded as a CSV list with the v9 Fabric location IDs being challenged and the reason code on which the challenge is based. For Reason Code 1 locations, the subcode must also be provided. A template CSV file will be provided for use in the challenge portal. Evidence to support challenges must be uploaded alongside the challenge location CSV file in the challenge portal as attachments in PDF or zipped folder form. Evidence must be provided on a location level basis.

It is the responsibility of the challenger to provide sufficient evidence to appropriately document the challenge. Acceptable evidence can vary by technology type and challenge reason code. Some examples include GIS shapefiles showing an existing fiber footprint, documentation of available wireless backhaul, propagation studies, documentation of spotbeam capacity, documentation of a subscriber to service at a location within the past 12 months, supporting engineering or operational records showing service capability at a location, or photo evidence of network infrastructure.

For locations with existing broadband service (Reason Code 5), evidence must include documentation to substantiate broadband service consistent with NTIA's BEAD Performance Measures Policy Notice. For locations with planned service (Reason Code 6), evidence must include construction contracts or similar evidence of ongoing deployment, along with evidence that all necessary permits have been applied for or obtained. Evidence must also include that

planned service will meet the BEAD definition and requirements of reliable and qualifying broadband even if not required by its funding source (i.e., a separate federal grant program), including the expected date deployment will be completed, which must be on or before September 3, 2027.

An attestation of available service or a location shown as served on the FCC National Broadband Map is **not** sufficient evidence for a challenge. The VA OoB reserves the right to request additional information to determine the validity of a challenge. Such requests must be fulfilled by the challenger within 5 business days of request.