

Northwest Communications has been an internet broadband provider in many of the listed service locations listed in this grant application for many years. Northwest Communications already provides fiber services and fixed wireless (licensed and unlicensed) which includes LTE Telrad that is mentioned in this application.

For the following coverage areas that have the capability of 25/3 and higher, and locations with 500 Meg plus speeds using fiber and DSL networks: Pocahontas, Havelock, Plover, Curlew, West Bend, Rolfe, Ayrshire, Gillett Grove.

It appears the targeted service areas are using a map from 2015. Since then we have made great strides in updating our fiber network and DSL services substantially utilizing other funding mechanisms, such as the FCC A-CAM (Alternative Connect America Cost Model) program. A-CAM's ultimate goal is provide 25/3 in underserved areas. Northwest has consistently upgraded our facilities to keep up with the ever increasing needs of our rural subscribers, for both business and residential.

The following locations, also specifically mentioned in the application, have had the capability of 25/3 with fixed wireless solutions using both unlicensed and Telrad LTE licensed technology for several years: Rolfe, Jolley, Pocahontas, Manson, Albert City and Early. In some locations they are coupled with Fiber and DSL networks listed above.

In addition to these locations we have over 40 other locations throughout the targeted services area that have been substantially upgraded since 2015 and will continue to be upgraded as bandwidth is needed, which will be a continuous cycle. Attached is a coverage map showing the location of customers we serve. The gaps in the map are not reflective of a lack in coverage, they tell us there hasn't been a customer request for service.

In our view it could be detrimental to reward/fund one company and thus devaluing the efforts of other companies who have continuously upgraded their networks over the same time period. Many of the locations listed by the applicant are towers that likely need upgrading for their company to compete with existing competitors that have consistently made the investment in their networks.

It would be an error to provide funds for already served areas that the map clearly does not show. State funds could be better used on actual underserved areas in the state, rather than to build over top of federally funded programs, such as A-CAM.

It is apparent that some of these tower locations exist in or near cities and rural areas where there is fiber with 25, 50, 100 Meg service offerings and higher already provided. Not to mention the named technology for upgrades is Telrad LTE, which is already widely deployed in the applicant's service area.

We do not want to imply that there are not areas that could benefit from a program like this, but many areas in this particular application would be an over build of existing capable systems. While we applaud the State of Iowa for trying to encourage faster speeds across the state, this area has other providers that have upgraded services to provide 25/3 that aren't listed on the map.

