

STATE OF IOWA

KIM REYNOLDS, GOVERNOR ADAM GREGG, LT. GOVERNOR ANNETTE DUNN
CHIEF INFORMATION OFFICER

FINAL AGENCY DECISION

Docket No. SD20V3162¹ February 3, 2021

In response to the Notice of Appeal ("Appeal") filed by Bits of Technology Wireless Internet LLC ("Appellant") pursuant to and in accordance with Iowa Administrative Code rules 129—20.5(1) and (2), and following the Office of the Chief Information Officer of the State of Iowa's ("Office") notification of and opportunity for input from affected persons and parties pursuant to and in accordance with Iowa Administrative Code rule 129—20.5(3), the Office has conducted an internal review of all relevant evidence and information both submitted in connection with this Appeal and otherwise available to the Office related to the United States Census Blocks ("Census Blocks") forming the basis of this Appeal. See Iowa Admin. Code r. 129—20.5(4). Following its review of the entire record before it, the Office issues the following FINAL AGENCY DECISION ("Decision"). Iowa Admin. Code r. 129—20.5(5).

I. ISSUE(S) ON APPEAL.

Whether the Office correctly determined that the Census Blocks forming the basis of this Appeal constitute Targeted Service Areas ("TSAs") or non-Targeted Services Areas, as defined by Iowa Code section 8B.1(13) and Iowa Administrative Code rule 129—20.1.

II. BACKGROUND, LAW, AND PROCEEDINGS.

Iowa Code section 8B.11, as amended, creates programs the Office is responsible for or involved in administering, including a Broadband Grants Program and a Property Tax Exemption Program (Iowa Code section 427.1(40)). At a high level, these programs are designed to reduce or eliminate areas in the State that do not have access to Broadband service at minimally acceptable speed thresholds. *See* Iowa Code § 8B.11. In order to identify these unserved and underserved areas and best direct the incentives available through these programs, the Office is required to make determinations as to whether any Communications Service Providers already offer or Facilitate Broadband service at or above twenty-five megabits per second of download speed and three megabits per second of upload speed ("25/3") as of July 31, 2020 ("As of Date"). The Office makes these determinations on an individual Census Block basis by referencing Broadband availability maps or data sources that are widely accepted for accuracy and available for public review and comment. Iowa Code § 8B.10. In October 2020, the Office documented and communicated its TSA determinations by publishing Version 3 ("V3") of the Statewide Broadband

¹Appellant filed an "Affirmation, Attestation, and Certification of Service or lack of Service in Census Block Broadband Grants Program Broadband Availability Map Challenge Process" ("Certification") to initiate this Appeal. The Office considers this Certification to constitute a proper Notice of Appeal that comports with the form and content requirements of Iowa Administrative Code rule 129—20.5(1).

Availability Map ("Map"). Iowa Admin. Code r. 129—20.3, 20.4.

On October 28, 2020, the Office published V3 of the Map. V3 of the Map is based on maps and data sources made available by the Federal Communications Commission (FCC) and/or developed or produced by contractors or third parties retained or utilized by the Office for such purpose. Iowa Admin. Code r. 129—20.3. Data representing the status of fixed Broadband in Iowa is as of July 31, 2020. Iowa Admin. Code r. 129—20.1, 20.3, 20.4(1); see Broadband Availability Map - Version 3 Challenge Process, at OCIO.IOWA.GOV (https://ocio.iowa.gov/broadband-availability-map-version-3-challenge-process). In publishing V3 of the Map, the Office triggered a statutorily-required challenge period whereby "[w]ithin 20 days after [October 28], any person or party aggrieved or adversely affected by such determination may challenge the office's finding by filing a notice of appeal with the office" and "provid[ing] the office with all evidence and information necessary to support the appeal." Iowa Admin. Code r. 129-20.5(1); see also Iowa Code § 8B.10(2) ("The office shall establish procedures to allow challenges to the office's finding on whether an area meets the definition of targeted service area."). After the expiration of this initial twenty-day appeal window, the Office was to post any notices of appeal received by the Office online at ocio.iowa.gov/broadband. Id. r. 20.5(3). From the date of such posting, any other persons or parties affected by a challenge received by the Office would "have 20 calendar days to submit evidence and information in support of, or in opposition to, such appeal" to the Office. Id. After expiration of this second twenty-day submission window, the Office would "consolidate all appeals involving the same census block[s] and conduct an internal review of the evidence and information submitted by all appellants related thereto, in conjunction with any other evidence and information submitted by any affected persons or parties . . ., the maps and data sources originally utilized [by the Office], and any other information deemed relevant by the office." Id. r. 20.5(4). Thereafter, the Office would issue a final agency decision stating the reasons for the Office's decision concerning the census block(s) in question. *Id.* r. 20.5(5).

The period for appeals closed November 16, 2020 at 11:59 p.m. In accordance with Iowa Administrative Code rule 129—20.5(5), the Office is considering the evidence and information submitted to or otherwise available to the Office, and issuing final decisions concerning all of the Census Blocks forming the basis of appeals received by the Office.

III. FACTUAL BACKGROUND.

On November 16, 2020, within the initial twenty-day window, Appellant filed this Appeal (Docket 20OCIO162)². Therein, Appellant challenged the Office's determination with respect to the following 159 Census Blocks:

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² Appendix A - Bits of Technology Wireless Internet Appeal

190730801002134	190730801002086	191210603001130
190730801002132	190730801002087	191210603001155
190150207004019	190730801002088	191210603001156
190730801002135	190730801002106	191210603001154
190730801002133	190730801002107	191210603001153
190730801002122	190730801002116	191210603001152
190730801002123	190730801002117	191210603001151
190730801002124	190730801003000	191210603001180
190730801001000	190730801003001	191210603001177
190730801002137	190730801002109	191210603001178
190730801002136	190730801002110	191210603001137
190730801002121	190730801002111	191210603001122
190730801002120	190730801002112	191210603001136
190730801002125	190730801002113	191210603001149
190730801002126	190730801002114	191210603001148
190730801002131	190730802001101	191210603001211
190730801002138	190730802001108	191210603003031
190730801002118	190730802001109	191210603003039
190730801002119	190730802001110	191210603001145
190730801002127	190730802001114	191210603001144
190730801002128	190730802001115	191210603001142
190730801002129	190730801002142	191210603001134
190730801002130	190730801002115	191210603001132
190730801002139	190730801003012	191210603001107
190730801002140	190730801003002	191210603001109
190730801003071	190730801003007	191210603001103
190730801003072	190730801003008	191210603001102
190730801003070	190730801003009	191210603001093
190730801003076	190730801003011	191210603001092
190730801003003	191210603001188	191210603001096
190730801003004	191210603001090	191210603001095
190730801003005	191210603003026	191210603001094
190730801003006	191210603001158	191210603001097
190730801003016	191210603003023	191210603001099
190730801003017	191210603003060	191210603001100
190730801003019	191210603001159	191210603001118
190730801003020	191210603001157	191210603001116
190730801003046	191210603001174	191210603001067
190730801003089	191210603001181	191210603001066
190730801003097	191210603001166	191210603001065
190730801003099	191210601004254	191210603001119
190730801002101	191210601004137	191210603001128
190730801002102	191210603001167	191210603001064
190730801002041	191210601004116	191210603001063

191210603001127	191210601004119	191210603003162
191210603001061	191210601004120	191210603003180
191210603001062	191210603004024	191210603003158
191210603001029	191210603003200	191210603003157
191210603001060	191210603003145	191210603003159
191210603001059	191210603003146	191210603003004
191210603001162	191210603004020	191210603003003
191210601004117	191210603004019	191210601004221
191210601004118	191210603003163	191210601004220

Supporting its Appeal, Appellant completed and submitted a Certification. Pursuant to this Certification, Appellant attested and certified under penalty of perjury that it offered or Facilitated 25/3 Broadband service in each of the 159 Census Blocks forming the basis of its Appeal as of July 31, 2020. With respect to each of these 159 Census Blocks, Appellant explained:

Please see the attached excel spreadsheet for a listing of 159 census block ID's with corresponding representations where BTWI offers and/or facilitates 25/3 broadband. We have reported 30/10 coverage for these census blocks on FCC Form 477 for several years, continue to provide that same coverage in these areas, and have many current customers located throughout these areas. In addition to the attached excel spreadsheet, a listing of the census blocks with representations is also included with this scan.

Appellant requested that these Census Blocks be designated as non-TSAs.

As required by Iowa Administrative Code rule 129—20.5(3), the Office posted this Appeal online on November 6, 2020. See Broadband Availability Map - Version 3 Challenge Process, at OCIO.IOWA.GOV (https://ocio.iowa.gov/broadband-availability-map-version-3-challenge-process). Over the course of the next twenty days, "[no other] affected persons or parties . . . submit[ted] evidence and information in support of, or in opposition to, such appeal." Iowa Admin. Code r. 129—20.5(3). The Office subsequently conducted an internal review of all relevant evidence and information submitted by Appellant and otherwise available to the Office in connection with the Census Blocks forming the basis of this Appeal. *Id.* r. 20.5(4). Based on that review, the Office now issues the following Decision. *Id.* r. 20.5(5).

IV. DECISION(S) AND REASONING.

A. DECISION REGARDING BLOCK IDs (the "IV.A Blocks"):

190730801002134	190730801001000	190730801002138
190730801002132 190150207004019	190730801002137 190730801002136	190730801002118 190730801002119
190730801002135	190730801002130	190730801002119
190730801002133	190730801002120	190730801002128
190730801002122 190730801002123	190730801002125 190730801002126	190730801002129 190730801002130
190730801002123	190730801002120	190730801002130

190730801002140	190730801003008	191210603001093
190730801003071	190730801003009	191210603001092
190730801003072	190730801003011	191210603001096
190730801003070	191210603001188	191210603001095
190730801003076	191210603003026	191210603001094
190730801003003	191210603001158	191210603001097
190730801003004	191210603003023	191210603001099
190730801003006	191210603003060	191210603001100
190730801003016	191210603001159	191210603001118
190730801003017	191210603001157	191210603001116
190730801003019	191210603001174	191210603001067
190730801003020	191210603001181	191210603001066
190730801003046	191210603001166	191210603001119
190730801003089	191210601004254	191210603001128
190730801003097	191210601004137	191210603001064
190730801003099	191210603001167	191210603001063
190730801002101	191210601004116	191210603001127
190730801002102	191210603001130	191210603001061
190730801002086	191210603001155	191210603001062
190730801002087	191210603001156	191210603001029
190730801002088	191210603001154	191210603001060
190730801002106	191210603001153	191210603001059
190730801002107	191210603001152	191210603001162
190730801002116	191210603001151	191210601004118
190730801002117	191210603001180	191210601004119
190730801003000	191210603001177	191210601004120
190730801003001	191210603001178	191210603004024
190730801002109	191210603001137	191210603003200
190730801002110	191210603001122	191210603003145
190730801002111	191210603001136	191210603003146
190730801002112	191210603001149	191210603004020
190730801002113	191210603001148	191210603004019
190730801002114	191210603001211	191210603003163
190730802001101	191210603003031	191210603003162
190730802001108	191210603003039	191210603003180
190730802001109	191210603001145	191210603003158
190730802001110	191210603001144	191210603003157
190730802001114	191210603001142	191210603003159
190730802001115	191210603001134	191210603003004
190730801002142	191210603001132	191210603003003
190730801002115	191210603001107	191210601004221
190730801003012	191210603001109	191210601004220
190730801003002	191210603001103	
190730801003007	191210603001102	

- 1. SUMMARY: APPEAL GRANTED. The Office has received sufficient evidence to modify the current designation from TSA to non-TSA for 154 Census Blocks identified in Section IV.A.
- 2. **DETAILED RESPONSE:** With respect to the 154 IV.A Blocks, the Office has reviewed the evidence and information submitted by Appellant related thereto, in conjunction with the maps and data sources originally utilized in determining whether these Census Blocks are or are not TSAs. Iowa Admin. Code r. 129—20.5(4). In reviewing this evidence and information, the Office's specific objective is to determine whether it should change its original determination of "whether a communications service provider offers or facilitates broadband service" at or above 25/3 in the Census Blocks forming the basis of this Appeal as of July 31, 2020, based on the additional evidence and information now available to it, or whether its original determination based on the Broadband Availability Map V3 should stand. Iowa Code §§ 8B.1(13), 8B.10(1-2); Iowa Admin. Code r. 129—20.1, 20.3, 20.4, 20.5.

Here, the map data representing the status of fixed Broadband in Iowa as of July 31, 2020, and originally relied on by the Office in generating V3 of the Map indicates that no Communications Service Provider offered or Facilitated 25/3 Broadband as of July 31, 2020. Appellant completed and submitted a Certification on forms provided by the Office attesting under penalty of perjury that Appellant offered or Facilitated 25/3 Broadband in the Census Blocks forming the basis of this Appeal as of July 31, 2020. The Office considers this Certification to be particularly probative evidence of 25/3 Broadband service.

In addition, the Office did not receive any conflicting evidence or information from other interested Communications Service Providers or members of the public as it relates to these Census Blocks during the period for input from affected persons or parties. Iowa Admin. Code r. 129—20.5(3). Considering Appellant's Certification, and the lack of any competing evidence or information, the Office concludes 25/3 Broadband service was available in these Census Blocks as of July 31, 2020, and that these Census Blocks should be designated as non-TSAs and thereby are not eligible to receive State incentives under the programs administered by the Office.

- **B. DECISION REGARDING BLOCK IDs (the "IV.B Blocks"):** 190730801003005; 190730801002041; 191210603001090; 191210603001065; 191210601004117.
 - **1. SUMMARY: APPEAL GRANTED.** These five (5) blocks will remain non-TSAs. These blocks were originally designated as non-TSAs in V3 of the Map.
 - 2. **DETAILED RESPONSE:** With respect to the IV.B Blocks, the Office has reviewed the evidence and information submitted by Appellant related thereto, in conjunction with the maps and data sources originally utilized in determining

whether these Census Blocks are or are not TSAs. Iowa Admin. Code r. 129—20.5(4). In reviewing this evidence and information, the Office's specific objective is to determine whether it should change its original determination of "whether a communications service provider offers or facilitates broadband service" at or above 25/3 in the Census Blocks forming the basis of this Appeal as of July 31, 2020, based on the additional evidence and information now available to it, or whether its original determination based on the Broadband Availability Map V3 should stand. Iowa Code §§ 8B.1(13), 8B.10(1)-(2); Iowa Admin. Code r. 129—20.1, 20.3, 20.4, 20.5. The Office agrees with Appellant that these Census Blocks should remain designated as non-TSAs, consistent with the Office's original determination. The Office concludes these Census Blocks will remain non-TSAs.

V. APPEALING FURTHER. If you wish to appeal this Decision further, within thirty (30) days of the posting of this Decision at <u>ocio.iowa.gov/broadband</u>, you must notify us in writing by mailing a written request for a contested case proceeding to:

Office of the Chief Information Officer
c/o Matt Behrens
200 E. Grand Avenue
Des Moines, Iowa 50309

In so doing, you must state the reason(s) you are appealing this Decision, specifically identifying the particular aspects of the Decision with which you disagree and the reasons why, whether factual or legal in nature. The request for a contested case proceeding should state the name and address of the requester; identify the specific Office action which is disputed; and, where the requester is represented by a lawyer, identify the provisions of law or precedent requiring or authorizing the holding of a contested case proceeding in the particular circumstances involved, and include a short and plain statement of the issues of material fact in dispute. Iowa Admin. Code r. 129—6.4.

Upon receipt, your appeal will be forwarded to the Department of Inspections and Appeals where an Administrative Law Judge ("ALJ") will perform an independent review. Iowa Admin. Code r. 129—20.6(1); Iowa Admin. Code r. 129—6.6. At that time, you will have an opportunity to make a presentation, in person or over the telephone, to an ALJ regarding the nature of your concerns. If you do not exercise your appeal right within thirty (30) days of the posting of this Decision at ocio.iowa.gov/broadband, this Decision shall become final and no longer subject to challenge. Iowa Admin. Code r. 129—20.5(5).

Sincerely,	
Matt Behrens	
Deputy Chief Information Officer	
State of Iowa	

Appendix A



STATE OF IOW

KIM REYNOLDS, GOVERNOR ADAM GREGG, LT. GOVERNOR ANNETTE DUNN

CHIEF INFORMATION OFFICER

Affirmation, Attestation, and Certification of Service or Lack of Service in Census Blocks Broadband Grants Program Broadband Availability Map Challenge Process

A. COMPANY IN	IFORMATION (if submitted	on behalf of an entity)				
Company Name:	BTWI (Bits of Technology V	Wireless Internet LLC)				
Address:	1020 26 th St					
City:	Perry	State:	lowa	Zip:	50220	

B. DESIGNATED CONTACT INFORMATION	A STATE OF THE STA	Carle L.	A Prince	
Contact Name	Phone #	(515) 465 - 3043	Email:	jeff@btwi.net

C. CERTIFICATION/ATTESTATION/AFFIRMATION

In signing and submitting this form, the above-identified company, and its duly authorized representative signing on behalf thereof, hereby affirms, attests, and certifies under penalty of perjury that, as represented in its submission:

- 1. Company, consistent with the representations made in this form, and regardless of whether your company's prior reporting to the FCC and/or Connected Nation was correct or in error, either:
 - a. Offered or Facilitated material Broadband service at or above twenty-five (25) megabits per second of download speed and three (3) megabits per second of upload speed ("25/3 Broadband") in the identified census blocks as of July 31, 2020; or
 - b. Did <u>NOT</u> offer or Facilitate 25/3 Broadband in the identified census blocks as of July 31, 2020;

OR

- 2. Another unaffiliated company, consistent with the representations made in this form, either:
 - Offered or Facilitated material Broadband service at or above twenty-five (25) megabits per second of download speed
 and three (3) megabits per second of upload speed ("25/3 Broadband") in the identified census blocks as of July 31,
 2020; or
 - b. Did NOT offer or Facilitate 25/3 Broadband in the identified census blocks as of July 31, 2020;

Choose One

[X] Response Concerns Your Company or An Affiliated Company (#1 above)

OR

[] Response Concerns An Unaffiliated Company (#2 above)

200 E. GRAND AVE, DES MOINES, IOWA 50309

515.281.5503 1 CIO@IOWA.GOV

CENSUS BLOCK ID IN WHICH 25/3 BROADBAND OFFERED OR FACILITATED (OR NOT)		PRIOR to FCC or C	25/3 Broadband materially FACILITATED AS OF July 31, 2020		
(please attach excel spreadsheet listing additional census blocks and making corresponding representations in columns to the right if necessary)	Correct means No Response	data was reported s data was reported means data was no <u>own</u> means data is	Yes means 25/3 broadband was available as of July 31, 2020 No means 25/3 broadband was not available as of July 31, 2020		
and the second second second second	[] In Error	[] Correct	[] No Response	[] Unknown	[]Yes []No
	[] In Error	[] Correct	[] No Response	[] Unknown	[] Yes [] No
	[] In Error	[] Correct	[] No Response	[] Unknown	[] Yes [] No
	[] In Error	[] Correct	[] No Response	[] Unknown	[] Yes [] No
	[] In Error	[] Correct	[] No Response	[] Unknown	[]Yes []No
	[] In Error	[] Correct	[] No Response	[] Unknown	[]Yes []No
offers and/or facilitates a minim for several years, continue to pr these areas. In addition to the attached exce	rovide that same o	overage in the	se areas, and have n	nany current cus	tomers located throughout
E. SIGNATURE*	THE THEFT	-	A Land Comp	in the	
Authorized Signature:	Sperke	ll .		Date: 11/16/2	020
Printed Name: Aprile	erhoff			•	
Title: Mana	ging Member				
200 E. GRAND AVE, DES MOINES	s, Iowa 50309	51	5.281.5503 2		CIO@IOWA.GOV

*PLEASE READ BEFORE SIGNING: By signing and submitting this form, I, on my own behalf or as a representative of the company identified above, as applicable, expressly represent that I am authorized to make the above factual representation on behalf of said company and/or myself, as applicable, and under penalty of perjury as authorized by lowa Code section 622.1 and pursuant to the laws of the state of lowa, certify the following with respect to this form submitted on behalf of said company and/or myself: any statements, representations, warranties, certifications, or attestations made in this form, including any attachments or enclosures associated therewith, are true and accurate; I, on behalf of said company and/or myself, have not knowingly made any false statements or representations in this form. In addition to any criminal penalties authorized by lowa Code section 720.2 that may result from any false statements of material fact made herein or any other remedies available at law, equity, or otherwise, if it is subsequently determined that I have made a statement, representation, warranty, certification, or attestation in this form, or any attachments or enclosures associated herewith, that is later proven untrue in any material respect, the company on which I submitted this form on behalf of may be disqualified from current incentive programs administered by the Office or may be ordered to repay the Office the entire amount of any funds previously distributed by the Office to said company in connection with any current incentive programs administered by the Office. OCIO makes no guarantees as to whether the information supplied by you will result in any change to the Broadband Availability Map V3 or the way any incentive decisions are reviewed, scored, or decided. This form, as completed, any attachments hereto, and any other information or materials submitted to the Office in connection with this form or related inquiry, shall be considered public records and shall be made available for public examination and/or disseminated upon request by third parties as required by lowa Code chapter 22. The Office reserves the right to reject this form and relatedly consider any information communicated through this form as neither credible nor probative if this form is not fully and properly filled

200 E. GRAND AVE, DES MOINES, IOWA 50309

515.281.5503 3 CIO@IOWA.GOV

CENSUS BLOCK ID IN WHICH 25/3 BROADBAND OFFERED OR FACILITATED (OR NOT) (please attach excel spreadsheet		PRIOR R	EPORTING		25/3 Broadband materiall FACILITATED AS OF July 31 2020 Yes means 25/3 broadband was	
listing additional census blocks and naking corresponding representations in columns to the right if necessary)		to FCC or Co	nnected Nation	TF.	available as of July 31, 2020 No means 25/3 broadband was not available as of July 31, 2020	
190730801002134	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002132	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190150207004019	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002135	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002133	[] In Error	[X] Correct	[] No Response	[] Unknown	. [X] Yes [] No	
190730801002122	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002123	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002124	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801001000	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002137	[] In Error	[X] Correct	[] No Response	[] Unknown	· [X] Yes [] No	
190730801002136	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002121	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002120	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002125	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002126	[] In Error	[X] Correct	[] No Response	[] Unknown	. [X] Yes [] No	
190730801002131	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002138	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002118	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002119	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002127	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002128	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002129	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002130	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002139	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801002140	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801003071	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801003072	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801003070	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801003076	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801003003	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801003004	[] In Error	[X] Correct	[] No Response	[] Unknown	. [X] Yes [] No	
190730801003005	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801003006	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801003016	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801003017	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	
190730801003019	[] In Error	[X] Correct	[] No Response	[] Unknown	· [X] Yes [] No	
190730801003020	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No	

1007000100010	[] In Frence	[V] Correct	[] No Possesso	[] Halaaassa	M Vac I I No
190730801003046	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801003089	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801003097	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801003099	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002101	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002102	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002041	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002086	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002087	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002088	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002106	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002107	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002116	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002117	[] In Error	[X] Correct	[] No Response	[] Unknown	. [X] Yes [] No
190730801003000	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801003001	[] in Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002109	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002110	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002111	[] In Error	[X] Correct	[] No Response	[] Unknown	_ [X] Yes [] No
190730801002112	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002113	[] in Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002114	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730802001101	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730802001108	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730802001109	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730802001110	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730802001114	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730802001115	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002142	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801002115	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801003012	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801003002	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801003007	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801003008	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
190730801003009	[] In Error	[X] Correct	[] No Response	[] Unknown	. [X] Yes [] No
190730801003011	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001188	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001090	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603003026	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001158	[] In Error	[X] Correct	[] No Response	[] Unknown	· [X] Yes [] No
191210603003023	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603003060	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No

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191210603001159	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001157	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001174	[] In Error	[X] Correct	[] No Response	[] Unknown	. [X] Yes [] No
191210603001181	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001166	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210601004254	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210601004137	- [] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001167	[] In Error	[X] Correct	[] No Response	[] Unknown	· [X] Yes [] No
191210601004116	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001130	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001155	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001156	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001154	[] In Error	[X] Correct	[] No Response	[] Unknown	. [X] Yes [] No
191210603001153	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001152	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001151	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001180	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001177	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001178	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001137	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001122	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001136	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001149	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001148	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001211	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603003031	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603003039	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001145	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001144	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001142	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001134	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001132	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001107	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001109	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001103	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001102	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001093	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001092	. [] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001096	[] In Error	[X] Correct	[] No Response	[] Unknown	. [X] Yes [] No
191210603001095	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001094	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001097	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No

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191210603001099	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001100	[] In Error	[X] Correct	[] No Response	[] Unknown	· [X] Yes [] No
191210603001118	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001116	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001067	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001066	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001065	[] In Error	[X] Correct	[] No Response	[] Unknown	. [X] Yes [] No
191210603001119	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001128	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001064	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001063	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001127	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001061	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001062	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001029	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001060	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001059	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603001162	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210601004117	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210601004118	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210601004119	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210601004120	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603004024	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603003200	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603003145	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603003146	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603004020	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603004019	[] In Error	[X] Correct	[] No Response	[] Unknown	· [X] Yes [] No
191210603003163	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603003162	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603003180	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603003158	. [] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603003157	[] In Error	[X] Correct	[] No Response	[] Unknown	. [X] Yes [] No
191210603003159	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603003004	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210603003003	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210601004221	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No
191210601004220	[] In Error	[X] Correct	[] No Response	[] Unknown	[X] Yes [] No