

FINAL AGENCY DECISION

STATEWIDE BROADBAND AVAILABILITY MAP VERSION 4 APPEAL September 14, 2021

DOCKET NO. 21-1013

A. APPELLANT INFORMATION

Company Name	Panora Telephone Cooperative
Address	114 E Main St
City	Panora
State	IA
Zip	50216

B. DESIGNATED CONTACT INFORMATION

Contact Name	Andrew Randol
Contact Phone Number	641-755-2424
Contact Email	andrewrandol@panoratelco.com

C. APPEAL TYPE

- ☐ Resident Challenge
☐ First-Party Provider Challenge
☒ Third-Party Provider Challenge

D. EVIDENCE CONSIDERED

With respect to the Census Blocks forming the basis of this Appeal, the Office has reviewed the evidence and information submitted by Appellant related thereto (see Appendix B for original submission), in conjunction with the maps and data sources originally utilized in determining the TSA designation of these Census Blocks, and made a determination as to the Census Block TSA Tier designations as set forth in Appendix A.

- ☒ If checked, Appellant submitted a Certification as part of its Appeal, affirming under penalty of perjury whether or not Broadband service was Facilitated, and at which tier level, in Census Blocks as of July 1, 2021.
- ☒ If checked, Appellant submitted additional information in support of its Appeal. This information has been considered by the Office in making its Final Decision.
- ☐ If checked, challenged Census Blocks within this Appeal overlap with other Appeals containing one or more of the same Blocks. The Office considered evidence submitted in connection with any overlapping Appeal in making its final decision for any overlapping Census Block.
- ☒ If checked, the Office sent requests for additional information to Third-Party Provider(s) concerning whether reported broadband service was Facilitated in one or more blocks of this Appeal as reflected on Map V4 as of July 1, 2021. The Office may have received Affirmation(s) and/or other evidence from Third-Party Provider(s) in response to such requests. Refer to Appendix C for a record of these efforts.

Go to <https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process> for more information regarding how the Office evaluates evidence and decides tier designations for appealed blocks.

E. TO APPEAL FURTHER

The Office will post its Final Decisions on its website at ocio.iowa.gov/broadband. If an Appellant wishes to appeal the Decision further Appellant must notify the Office in writing within thirty (30) days of the posting of the Decision. Iowa Admin. Code r. 129–20.5(5). A request for a contested case must be filed by mailing a written request to:

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

In so doing, the reason for further appealing this Decision must be stated, specifically identifying the particular aspects of the Decision with which Appellant disagrees 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, the 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, an ALJ will schedule a hearing. If Appellant does not exercise its appeal right within thirty (30) days of the posting of this Decision, this Decision shall become final and no longer subject to challenge. Iowa Admin. Code r. 129–20.5(5).

SIGNED
DATE

Matt Behrens
Deputy Chief Information Officer
State of Iowa

APPENDIX A - FINAL DECISION

DEFINITIONS

Targeted Service Area	A Targeted Service Area (TSA) is a census block within which no communications service provider offers or facilitates broadband service at or above the tier 1, tier 2, or tier 3 download and upload speeds, as applicable.					
Tier 1	A maximum download speed of less than 25 megabits per second (Mbps) and a maximum upload speed of less than 3 Mbps.					
Tier 2	A minimum download speed of greater than or equal to 25 Mbps but less than 50 Mbps. No minimum upload speed is applicable for Tier 2.					
Tier 3	A minimum download speed of greater than or equal to 50 Mbps but less than 80 Mbps. No minimum upload speed is applicable for Tier 3.					
Non-TSA	A non-TSA is a census block in which speeds are Facilitated at greater than or equal to 80 Mbps.					
Facilitate	A communication service provider's ability to provide broadband service at or above the download and upload speeds defined above to a home, farm, school, or business within a commercially reasonable time and at a commercially reasonable price upon request by a consumer. This does <i>not</i> pertain to the Broadband Infrastructure used to facilitate said service; Broadband Infrastructure is <i>not</i> a basis for appeal.					
Map V4 Designation	The speed tier reflected on the Map as of July 1, 2021.					
Decision Basis	The Decision Basis number reflected in this column corresponds to a general explanation for why this Office made its decision regarding the Block. The Decision Bases are posted on the website at https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process .					
Overlapping Appeal	Indicates the Docket Number in which the Census Block has been challenged in another Appeal. The Final Agency Decision may be impacted by additional or alternate information or affirmations received in conjunction with another Appeal for the same Block.					
Prior Reporting	The Prior Reporting column reflects information provided by Appellant on the Appeal. The Prior Reporting to FCC or Connected Nation may reflect one of the following:					
	In Error: Data was reported incorrectly to FCC or Connected Nation	Correct: Data was reported correctly to FCC or Connected Nation	No Response: Data was not reported to FCC or Connected Nation	Unknown: Data is incorrect for unknown reasons		

Docket No.	Census Block ID	Prior Reporting	Map V4 Designation	Appellant's Request	Final Agency Decision	Decision Basis	Overlapping Appeal
21-1013	190779501001054	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1013	190779501001062	Unknown	Tier 3	Tier 1	Tier 1	1	
21-1013	190779501001042	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1013	190779501001041	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1013	190779501001043	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1013	190779501001317	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1013	190779501001319	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1013	190779501001058	Unknown	Non-TSA	Tier 1	Non-TSA	3	

21-1013	190779501001033	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1013	190779501001020	Unknown	Tier 3	Tier 1	Tier 1	1	
21-1013	190779501001321	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1013	190779501001044	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1013	190779501001051	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1013	190779501001049	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1013	190779501001061	Unknown	Tier 3	Tier 1	Tier 1	1	
21-1013	190779501001052	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1013	190779501001326	Unknown	Non-TSA	Tier 1	Tier 1	1	
21-1013	190779501001046	Unknown	Non-TSA	Tier 1	Non-TSA	3	
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21-1013	190779501001055	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1013	190779501001318	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1013	190779501001057	Unknown	Tier 3	Tier 1	Tier 1	1	
21-1013	190779501001036	Unknown	Non-TSA	Tier 1	Tier 1	1	
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21-1013	190490505002091	Unknown	Non-TSA	Tier 1	Non-TSA	3	

APPENDIX B
CERTIFICATION AND SUPPORTING INFORMATION



Grants, OCIO <ociogrants@iowa.gov>

Panora's NOFA #006 IA Grant Challenge

1 message

Jill Weber <jill.weber@vantagepnt.com>

Fri, Jul 16, 2021 at 5:21 PM

To: "Grants, OCIO" <ociogrants@iowa.gov>

Cc: Andrew Randol <andrewrandol@panoratelco.com>, Curt Thornberry <curtthornberry@panoratelco.com>

Hello,

Attached please find Panora's NOFA #006 IA Grant Challenge as well as their support documentation. Please confirm receipt at your earliest convenience.

Thank you,

Jill Weber

Sr. Analyst

Main: 605.995.1777

Office: 605-995-1832

Jill.Weber@Vantagepnt.com



Mitchell | Portland | Colorado Springs | San Antonio | Sioux Falls | Springfield | Charlotte

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This message is intended solely for the use of the individual and entity to whom it is addressed and may contain information that is privileged, confidential, and exempt from disclosure under applicable state and federal laws. If you are not the addressee or are not authorized to receive for the intended addressee you are hereby notified that you may not use, copy, distribute, or disclose to anyone this message or the information contained herein. If you have received this message in error, immediately advise the sender by reply email and destroy this message.

2 attachments



Panora map_v4_ OCIO provider_challenge_form.xlsx

712K

7/19/2021

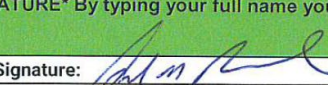
State of Iowa Mail - Panora's NOFA #006 IA Grant Challenge



Panora Speed Tests - Bagley and Bayard.pdf

659K



A. APPELLANT INFORMATION	
Company Name	Panora Telephone Cooperative
Address	114 E Main St
City	Panora
State	IA
Zip	50216
B. DESIGNATED CONTACT INFORMATION	
Contact Name	Andrew Randol
Contact Phone Number	641-755-2424
Contact Email	andrewrandol@panoratelco.com
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: Choose one option that describes company/affiliation status.	
<p>Company, consistent with the representations made in this form, and regardless of whether your company's prior reporting to the FCC or State of Iowa was correct or in error as of July 1, 2021, either:</p> <p>(a.) Facilitated material Broadband service according to the designated Tier speed indicated on the Map; or <input type="checkbox"/></p> <p>(b.) Did NOT Facilitate Broadband according to the designated Tier speed in the identified census blocks.</p>	
<p>Another unaffiliated company, as of July 1, 2021, consistent with the representations made in this form, either: (a.) Facilitated material Broadband service according to the designated Tier speed indicated on the Map; or (b.) Did NOT Facilitate Broadband according to the designated Tier speed in the identified census blocks. <input checked="" type="checkbox"/></p>	
D. ADDITIONAL EXPLANATION (To the extent you believe additional explanation is required to ensure that you are communicating full and accurate information, please use the below space to further explain, qualify, or substantiate your above certification/attestation/affirmation. To the extent necessary, please feel free to upload additional explanations/supporting documentation.	
<p>Panora strongly disagrees with the Windstream (WS) coverage claims in the listed census blocks. Panora has significant knowledge about the WS network in Bagley as they used to provide CATV service. WS has an older copper network in Bagley which is technically incapable of providing the speeds reported by WS. A Panora technician conducted a speed test at the Bagley Public Library on 7.12.21. See attached screen print of the test which shows a speed of 1.58M down and .72M up was recorded. Furthermore, Panora is including a speed test from a Bayard resident and WS subscriber. While this customer subscribes to 100M service, the speed tests performed on 7.16.21 bottom out at a download speed of 1.92M and an upload speed of only 9.38M. These results are typical of an older copper network, which WS has deployed in both Bagley and Bayard. These speeds are far below what WS is reporting. If WS did report the actual speeds the network is capable of, the town would be eligible for the OCIO grant program. This is also true for the WS towns of Linden and Jamaica where Panora was also the CATV provider and WS has the same aging copper plant. The current copper plant located in all of these small communities is basically the same and unable to support the speeds WS has reported. Panora shared these concerns on a call on 5.10.21 with staff from Connected Nation. Connected Nation agreed that the speeds</p>	
E. SIGNATURE* By typing your full name you are affixing your signature to this form and attesting to the accuracy of the information submitted herein.	
Authorized Signature: 	Andrew Randol
Title: CEO	CEO/General Manager
Date: 7/16/21	7/16/2021

*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 Iowa Code section 622.1 and pursuant to the laws of the state of Iowa, 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 Iowa 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 V4 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 Iowa 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 out.

Please familiarize yourself with the following terms prior to determining whether a broadband block may be appealed.

Targeted Service Area	A Targeted Service Area (TSA) is a census block within which no communications service provider offers or facilitates broadband service at or above the tier 1, tier 2, or tier 3 download and upload speeds.
Existing Broadband Speed Tiers	The speed tiers used to determine whether a broadband block qualifies as a Targeted Service Area on the Statewide Broadband Availability Map.
Tier 1	A maximum download speed of less than 25 megabits per second (Mbps) and a maximum upload speed of less than 3 Mbps.
Tier 2	A minimum download speed of greater than or equal to 25 Mbps but less than 50 Mbps. No minimum upload speed is applicable for Tier 2.
Tier 3	A minimum download speed of greater than or equal to 50 Mbps but less than 80 Mbps. No minimum upload speed is applicable for Tier 3.
Non-TSA	A non-TSA is a census block in which speeds are Facilitated at greater than equal to 80 Mbps
Facilitate	A communication service provider's ability to provide broadband service at or above the download and upload speeds defined above to a home, farm, school, or business within a commercially reasonable time and at a commercially reasonable price upon request by a consumer. This does <i>not</i> pertain to the Broadband Infrastructure used to facilitate said service; Broadband Infrastructure is <i>not</i> a basis for appeal.

CENSUS BLOCK ID	Prior Reporting to FCC or Connected Nation Definitions 1. <u>In Error</u> means data was reported incorrectly to FCC or Connected Nation. 2. <u>Correct</u> means data was reported correctly to FCC or Connected Nation. 3. <u>No Response</u> means data was not reported to FCC or Connected Nation. 4. <u>Unknown</u> means data is incorrect for unknown reasons	Speed Tier that is reflected on Map v.4	What do you believe the Map should reflect for Facilitated service as of July1, 2021?
190779501001054	Unknown	Non-TSA	Tier 1
190779501001062	Unknown	Tier 3	Tier 1
190779501001042	Unknown	Non-TSA	Tier 1
190779501001041	Unknown	Non-TSA	Tier 1
190779501001043	Unknown	Non-TSA	Tier 1
190779501001317	Unknown	Non-TSA	Tier 1
190779501001319	Unknown	Non-TSA	Tier 1
190779501001058	Unknown	Non-TSA	Tier 1
190779501001033	Unknown	Non-TSA	Tier 1
190779501001020	Unknown	Tier 3	Tier 1
190779501001321	Unknown	Non-TSA	Tier 1
190779501001044	Unknown	Non-TSA	Tier 1
190779501001051	Unknown	Non-TSA	Tier 1
190779501001049	Unknown	Non-TSA	Tier 1
190779501001061	Unknown	Tier 3	Tier 1
190779501001052	Unknown	Non-TSA	Tier 1
190779501001326	Unknown	Non-TSA	Tier 1
190779501001046	Unknown	Non-TSA	Tier 1
190779501001312	Unknown	Non-TSA	Tier 1
190779501001047	Unknown	Non-TSA	Tier 1
190779501001055	Unknown	Non-TSA	Tier 1
190779501001318	Unknown	Non-TSA	Tier 1
190779501001057	Unknown	Tier 3	Tier 1

190779501001036	Unknown	Non-TSA	Tier 1
190779501001040	Unknown	Non-TSA	Tier 1
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190779501001315	Unknown	Non-TSA	Tier 1
190779501001056	Unknown	Non-TSA	Tier 1
190779501001038	Unknown	Non-TSA	Tier 1
190779501001032	Unknown	Non-TSA	Tier 1
190779501001323	Unknown	Non-TSA	Tier 1
190779501001037	Unknown	Non-TSA	Tier 1
190779501001035	Unknown	Non-TSA	Tier 1
190779501001034	Unknown	Non-TSA	Tier 1
190779501001039	Unknown	Non-TSA	Tier 1
190779501001048	Unknown	Non-TSA	Tier 1
190779501001050	Unknown	Non-TSA	Tier 1
190779501001324	Unknown	Tier 3	Tier 1
190779501001053	Unknown	Non-TSA	Tier 1
190779501001059	Unknown	Non-TSA	Tier 1
190779501001316	Unknown	Non-TSA	Tier 1
190779501001325	Unknown	Tier 3	Tier 1
190779501001313	Unknown	Non-TSA	Tier 1
190779501001327	Unknown	Non-TSA	Tier 1
190779501001314	Unknown	Non-TSA	Tier 1
190779501001320	Unknown	Non-TSA	Tier 1
190779502001089	Unknown	Non-TSA	Tier 1
190779502001131	Unknown	Tier 3	Tier 1
190779502001091	Unknown	Tier 3	Tier 1
190779502001056	Unknown	Tier 3	Tier 1
190779502001067	Unknown	Non-TSA	Tier 1
190779502001064	Unknown	Non-TSA	Tier 1
190779502001079	Unknown	Non-TSA	Tier 1
190779502001127	Unknown	Tier 3	Tier 1
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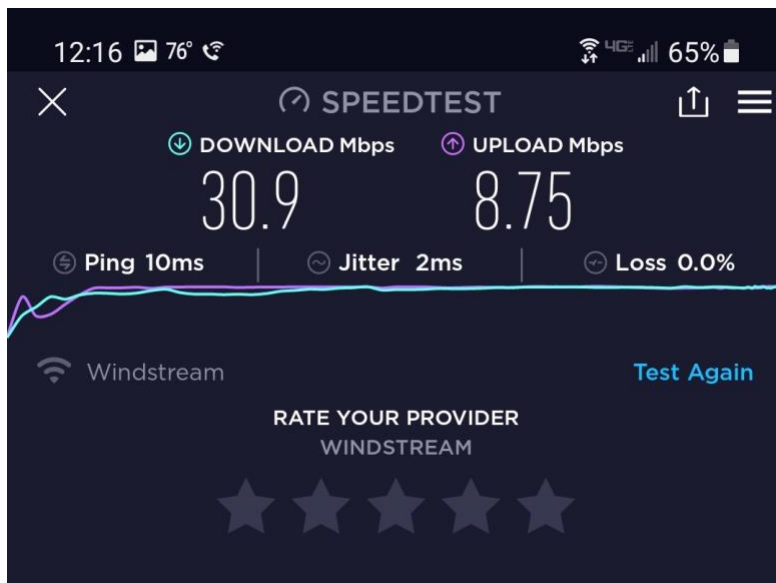
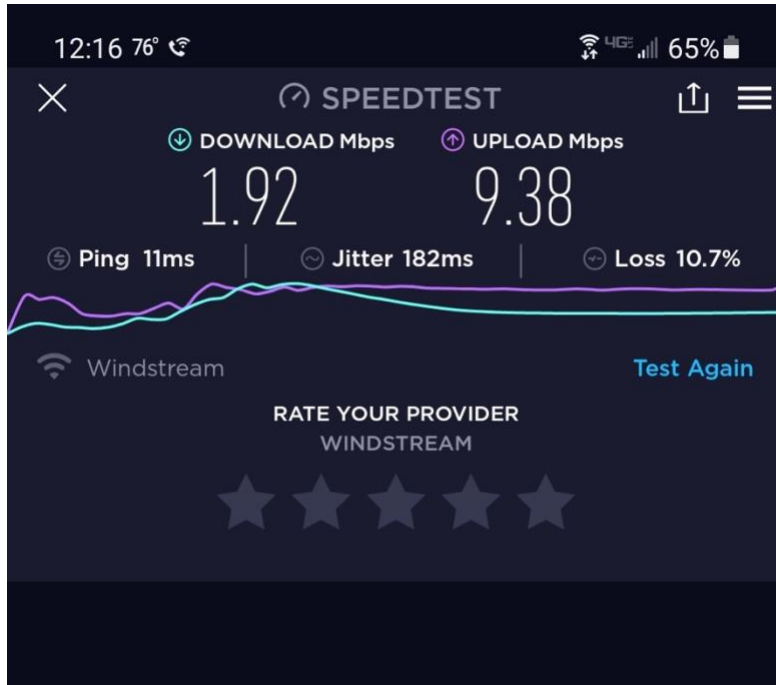
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190779502001083	Unknown	Non-TSA	Tier 1
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190779502001069	Unknown	Non-TSA	Tier 1
190779502001075	Unknown	Non-TSA	Tier 1
190779502001066	Unknown	Non-TSA	Tier 1
190779502001096	Unknown	Non-TSA	Tier 1
190779502001084	Unknown	Non-TSA	Tier 1
190779502001103	Unknown	Non-TSA	Tier 1
190779502001100	Unknown	Non-TSA	Tier 1

190779502001047	Unknown	Non-TSA	Tier 1
190779502001003	Unknown	Tier 3	Tier 1
190779502001043	Unknown	Non-TSA	Tier 1
190779502001071	Unknown	Tier 3	Tier 1
190779502001061	Unknown	Non-TSA	Tier 1
190779502001295	Unknown	Tier 3	Tier 1
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190779502001105	Unknown	Non-TSA	Tier 1
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190779501001143	Unknown	Non-TSA	Tier 1
190779501001106	Unknown	Non-TSA	Tier 1
190779501001116	Unknown	Non-TSA	Tier 1
190779501001098	Unknown	Non-TSA	Tier 1



190779501001112	Unknown	Non-TSA	Tier 1
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190490505002093	Unknown	Non-TSA	Tier 1
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190490505002094	Unknown	Non-TSA	Tier 1
190490505002091	Unknown	Non-TSA	Tier 1

Speedtests conducted by a Bayard customer who subscribes to 100 mbps Internet service from Windstream.



The Global x
edtest.net/result/11738555896

SHARE   

Result ID 11738555896

RESULTS SETTINGS

PING ms
10

DOWNLOAD Mbps
30.91

UPLOAD Mbps
8.39

GO

Connections
Multi

IP Pathways, LLC
Urbandale, IA
[Change Server](#)

Windstream
173.189.165.30

HOW DOES YOUR NETWORK AVAILABILITY
COMPARE WITH YOUR EXPECTATIONS?

1


2

3

4

5

Much worse As expected Much better



Having Internet Problems?

Popular services with reported issues

 [NBA 2k](#)
Possible Problems >

 [US Bank](#)
Possible Problems >

Speed Tests performed at Bagley Library.

SHARE

Result ID 11716210284

RESULTS SETTINGS

PING ms

40

DOWNLOAD Mbps

1.58

UPLOAD Mbps

0.72

GO

Connections
Multi

ImOn Communications,
LLC
Cedar Rapids, IA
[Change Server](#)

Windstream
72.25.21.25

HOW DOES YOUR NETWORK AVAILABILITY
COMPARE WITH YOUR EXPECTATIONS?

1

2

3

4

5

Much worse

As expected

Much better

Having Internet Problems?

Popular services with reported issues



[Adobe Creative Cloud](#)

Possible Problems



[Amazon](#)

Possible Problems

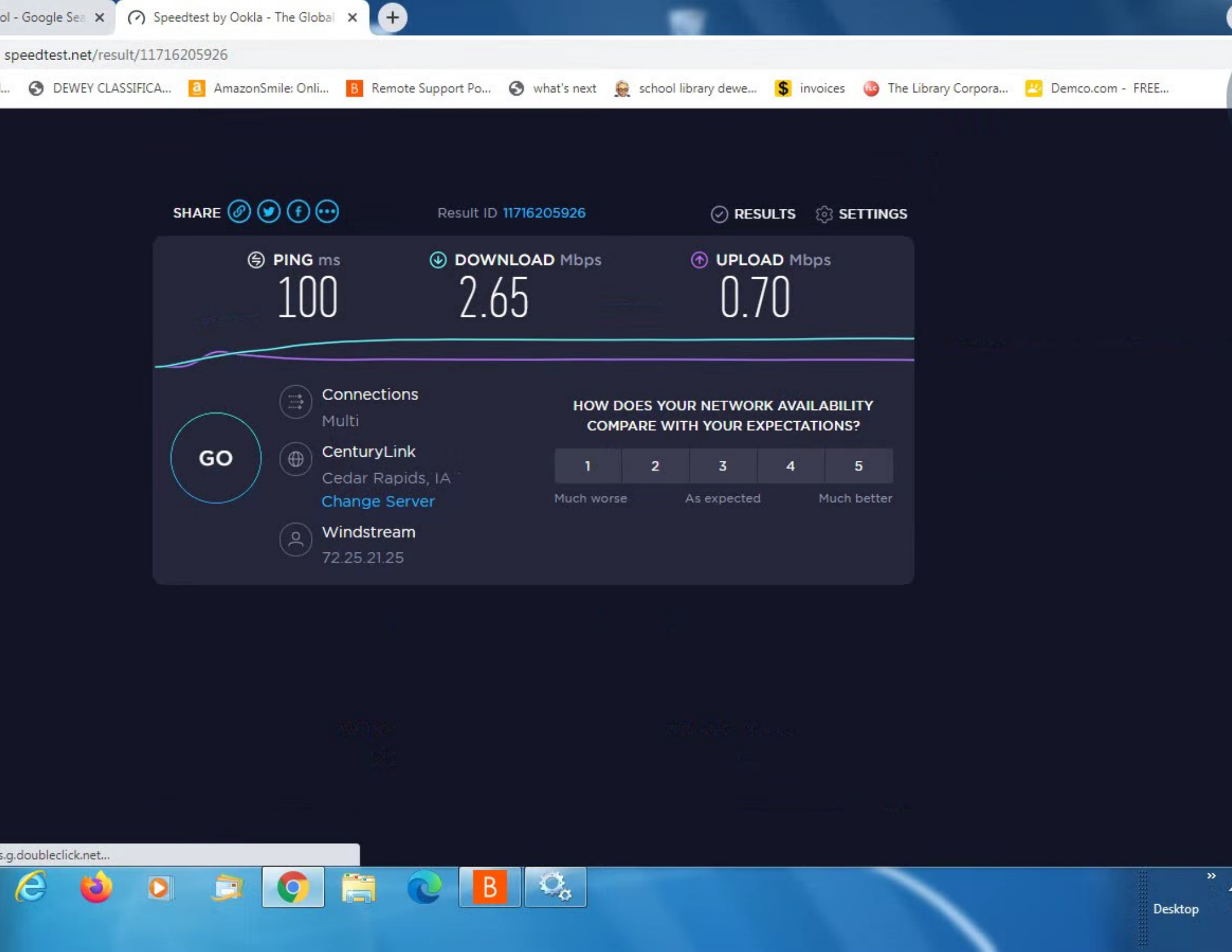
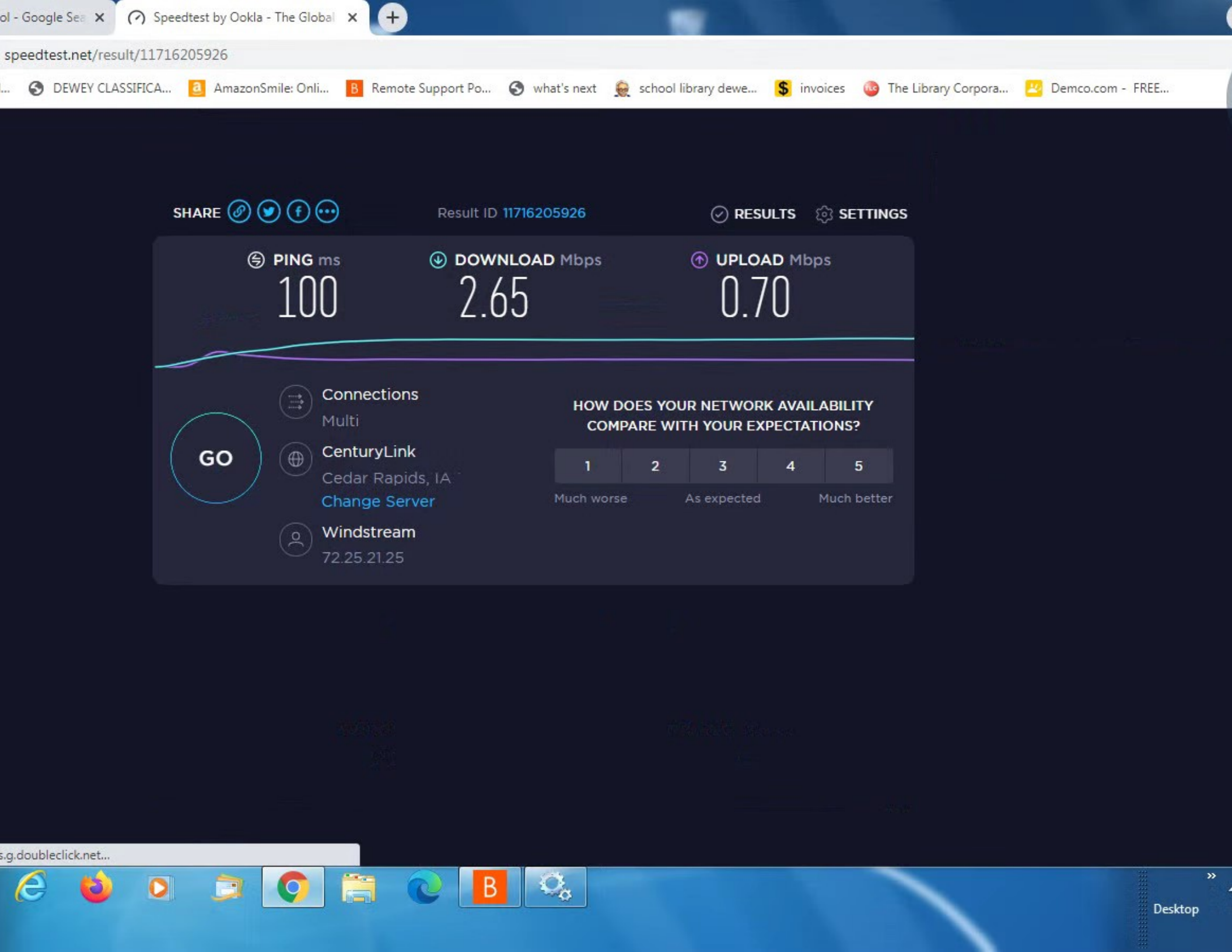


[Call of Duty](#)

Problems



View all outages on [downdetector.com](#)



APPENDIX C
THIRD-PARTY AFFIRMATIONS AND SUPPLEMENTAL EVIDENCE

July 28, 2021

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

Panora Communications Cooperative
Andy Randol
andrewrandol@panoratelco.com

To whom it may concern:

This is a letter of inquiry concerning your firm's prior reporting to the State of Iowa Office of the Chief Information Officer ("OCIO" or "Office") regarding the availability of Broadband service in certain United States Census Block(s) within Iowa. Our Office received a formal notice of appeal challenging information reported on the Broadband Availability Map Version 4 ("V4") of the Statewide Broadband Availability Map ("Map"). The data reflected on V4 of the Map was either (1) provided by you to the Office's contractor ("Connected Nation") during the data collection window of April 15 through April 30, 2021, (2) gathered from other sources (such as FCC) that collected data from you, or (3) carried forward from prior reporting made to this Office by you under a previous Map version. Map V4 categorizes census blocks according to the facilitated speed offered within the block. The publication of V4 triggered a formal appeal window, as explained in more detail below, during which time we received this appeal. The appeal we received claims that the data reflected on V4 of the Map is inaccurate. This appeal can be found at <https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process> (see Docket Numbers 21-1001, 21-1013, 21-1037, 21-1038). **To resolve this matter, the Office requests that your firm provide information concerning your service in the affected Census Blocks as further identified and described below by August 11, 2021.**

On July 1, 2021, the Office officially published the final version of V4 of the Map, which identifies where Broadband service was offered or Facilitated at a tier 1, tier 2, or tier 3 speed as of July 1, 2021.¹ V4 of the Map is based primarily on data submitted to Connected Nation and/or FCC by Communication Service Providers concerning their service capabilities in the State of Iowa² and on informal comments/feedback supplied by interested parties as part of the informal comment/feedback process described above and in which your firm may have participated. V4 of the Map, and a detailed background of the same, can be found at: <https://ocio.iowa.gov/broadband-availability-map-version-4>. Overall, the new map reflects Targeted Service Areas defined as a census block within which no communications service provider offers or facilitates broadband service at or above the tier 1, tier 2, or tier 3 download and upload speeds. The tier speeds are defined as follows:

¹See Iowa Code §§ 8B.1(12), 8B.10. *See also* Iowa Admin. Code r. 129—20.1, 20.3, 20.4.

²See Iowa Admin. Code r. 129—20.3.

“**Tier 1**” means a maximum download speed of less than 25 Mbps and a maximum upload speed of less than three Mbps.

“**Tier 2**” means a minimum download speed of greater than or equal to 25 Mbps but less than 50 Mbps. No minimum upload speed is applicable for Tier 2.

“**Tier 3**” means a minimum download speed of greater than or equal to 50 Mbps but less than 80 Mbps. No minimum upload speed is applicable for Tier 3.

“**Non-TSA**” means a census block in which speeds are facilitated at greater than or equal to 80 Mbps.

Through the official publication of V4 of the Map, the Office triggered the challenge process it is required by law to administer.³ Pursuant to applicable administrative rules, within 20 days after the Office’s official publication of V4 of the Map, “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” along with all evidence or information supporting their appeal. Iowa Admin. Code r. 129—20.5(1). Specifically, interested parties were permitted to provide the Office with evidence and information of the following: broadband is unavailable from a provider listed for the area (census block); or, that broadband speed is not as advertised.

V4 of the Map currently shows that service is Facilitated at either a tier 1, tier 2, or tier 3 speed per designated census block. As part of the above-outlined process, OCIO received a formal notice of appeal and supporting evidence or information from one or more Iowa residents or Communications Service Provider, claiming that Broadband service is not offered or Facilitated at that speed tier.

At this time, the Office requests your assistance in making an accurate determination as to whether your firm facilitates broadband service at the designated speed tier for 10% or more of the geographic area of each challenged census block as of July 1, 2021 to the Census Blocks identified in Exhibit A. To that end, the Office requests that you:

- 1) Complete and return the attached Affirmation of Service or Lack of Service in Census Blocks Broadband Grants Program Broadband Availability Map Challenge Process Form (see Exhibit A, Affirmation tab), by **August 11, 2021**. Pursuant to this form, OCIO requests that a representative with legal authority to bind your firm:
 - a) Confirm that your firm Facilitated Broadband service to the Census Blocks identified in Exhibit A as of July 1, 2021, and indicate the speeds at which your firm facilitated broadband service in those blocks. For purposes of this representation, “‘Facilitate’ means a communication service provider’s ability to provide broadband service at or above the download and upload speeds specified in the definition of targeted service area in this section to a home, farm, school, or business **within a commercially reasonable time and at a commercially reasonable price upon request by a consumer.**” Iowa Code § 8B.1(5) (emphasis added).
 - b) Fully complete all other aspects of the Form.
- 2) In addition to the form, please also submit any other evidence or information in your possession to the Office that supports your prior representations to the Office regarding the Census Blocks identified in Exhibit A. Examples of evidence and information the Office would consider particularly probative include “Bills or invoices provided to or received by customers in the

³See Iowa Code § 8B.10(2); Iowa Admin. Code r. 129—20.5.

applicable census block(s) which identify the specific download and upload speeds provided or received as of [July 1, 2021].” Iowa Admin. Code r. 129—20.5(8).

Please return the completed form and any supporting evidence or information to ociogrants@iowa.gov.

Please note that you are under no legal obligation to respond to this request for information. Generally, pursuant to applicable administrative rules, any affected person or party is free to submit evidence or information to the Office in support of or in opposition to an appeal within 20 days after the appeal has been posted to ocio.iowa.gov/broadband. Iowa Admin. Code r. 129—20.5(3). However, this Office is affirmatively reaching out to notify you of the appeal, of the circumstances surrounding the appeal, and to solicit your feedback and position. If this Office does not receive your response via Exhibit A of the Form by **August 11, 2021** (10 business days from the date of this letter), the Office will make a final decision based on the evidence and information currently available to it. Iowa Admin. Code r. 129—20.5(4), (5).

OCIO strives at all times to produce and disseminate accurate information. We appreciate your assistance in helping us achieve our statutory mandate.

Sincerely,

Office of the Chief Information Officer,
State of Iowa

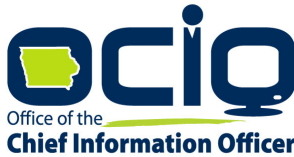


EXHIBIT A

**Affirmation of Service or Lack of Service in Census Blocks
Broadband Grants Program Broadband Availability Map Challenge Process**

A. RESPONDENT INFORMATION

Company Name	Panora Communications Cooperative
Address	114 East Main Street
City	Panora
State	Iowa
Zip	50216

B. DESIGNATED CONTACT INFORMATION

Contact Name	Andrew M. Randol
Contact Phone Number	641-755-2424
Contact Email	andrewrandol@panoratelco.com

C. AFFIRMATION

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

Company, consistent with the representations made in this form, and regardless of whether your company's prior reporting to the FCC or State of Iowa was correct or in error, meets one of the following criteria in each of the identified census blocks as of July 1, 2021:

1. Company Facilitated service at the indicated speeds on the Affirmation tab as of July 1, 2021 to more than 10% of the census block; or
2. Company did NOT offer or Facilitate material Broadband service.

Please indicate the speeds offered for each census block on the Affirmation tab.

D. ADDITIONAL EXPLANATION (To the extent you believe additional explanation is required to ensure that you are communicating full and accurate information, please use the below space to further explain, qualify, or substantiate your above affirmation. To the extent necessary, please feel free to upload additional explanations/supporting documentation.)

Areas marked as "no" are areas we can not serve with fixed broadband on a consistent level due to distance from the fixed wireless origination site and also terrain issues. Areas marked 10/1 are areas served by our cable modem service, which we can provide 10/1 service consistently to customers in these towns. Areas marked 18/3 are in a community served by fixed wireless. We could not serve 100% of the locations fixed wirelessly due to radio capacity but could serve up to radio capacity at this level. Per 477 reporting, we are to report maximum advertised speeds and this causes differences in what the 477 report generates for coverage and speeds compared to what this NOFA asks.

E. SIGNATURE* By typing your full name you are affixing your signature to this form and attesting to the accuracy of the information submitted herein.

Authorized Signature:	Andrew M. Randol
Title:	CEO
Date:	8/9/2021

*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 Iowa Code section 622.1 and pursuant to the laws of the state of Iowa, 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 Iowa 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 V4 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 Iowa 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 out.

Please familiarize yourself with the following terms prior to determining whether broadband service is being Facilitated to the census block.

Facilitate

A communication service provider's ability to provide broadband service at or above the download and upload speeds defined above to a home, farm, school, or business within a commercially reasonable time and at a commercially reasonable price upon request by a consumer. This does *not* pertain to the Broadband Infrastructure used to facilitate said service; Broadband Infrastructure is *not* a basis for appeal.

CENSUS BLOCK ID	Do you Facilitate service to more than 10% of the geographic area of the Census Block?	Download Speed	Upload Speed	Service Technology
190779503001102	No			
190779503001103	No			
190779503001111	No			
190779503001112	No			
190779503001114	No			
190779503001115	No			
190779503001116	No			
190779503001118	No			
190779503001120	No			
190779503001127	No			
190779503001129	No			
190779503001130	No			
190779503001131	No			

190779503001143	No			
190490505002023	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002079	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002080	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002081	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002082	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002083	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002084	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002085	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002088	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002089	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002090	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002091	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002093	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002094	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002095	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002096	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002097	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002098	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002099	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002123	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002124	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002129	Yes	10 mbps	1 mbps	CMTS (cable modem)
190490505002130	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001020	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001032	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001033	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001034	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001035	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001036	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001037	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001038	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001039	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001040	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001041	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001042	Yes	10 mbps	1 mbps	CMTS (cable modem)

[illegible]

190779501001117	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001118	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001119	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001120	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001121	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001122	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001138	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001139	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001140	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001142	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001143	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001312	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001313	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001314	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001315	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001316	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001317	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001318	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001319	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001320	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001321	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001322	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001323	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001324	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001325	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001326	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779501001327	Yes	10 mbps	1 mbps	CMTS (cable modem)
190779502001003	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001004	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001043	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001044	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001045	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001046	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001047	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001048	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001049	Yes	18 mbps	3 mbps	Fixed Wireless

190779502001050	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001051	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001052	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001053	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001054	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001055	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001056	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001057	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001058	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001059	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001060	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001061	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001062	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001063	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001064	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001065	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001066	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001067	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001068	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001069	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001070	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001071	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001072	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001073	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001074	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001075	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001076	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001077	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001078	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001079	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001080	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001081	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001082	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001083	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001084	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001085	Yes	18 mbps	3 mbps	Fixed Wireless

190779502001086	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001087	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001088	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001089	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001090	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001091	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001092	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001095	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001096	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001097	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001098	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001099	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001100	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001101	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001102	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001103	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001104	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001105	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001106	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001125	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001131	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001295	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001297	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001298	Yes	18 mbps	3 mbps	Fixed Wireless
190779502001299	Yes	18 mbps	3 mbps	Fixed Wireless
190490505001089	No			
190490505001098	No			
190490505001110	No			
190490505001127	No			
190490505001128	No			
190490505001129	No			
190490505001130	No			
190490505001134	No			
190490505001135	No			
190490505001145	No			
190490505001146	No			

[illegible]

July 28, 2021

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

BTWI Wireless Internet
Jeff Leerhoff
jeff@btwi.net

To whom it may concern:

This is a letter of inquiry concerning your firm's prior reporting to the State of Iowa Office of the Chief Information Officer ("OCIO" or "Office") regarding the availability of Broadband service in certain United States Census Block(s) within Iowa. Our Office received a formal notice of appeal challenging information reported on the Broadband Availability Map Version 4 ("V4") of the Statewide Broadband Availability Map ("Map"). The data reflected on V4 of the Map was either (1) provided by you to the Office's contractor ("Connected Nation") during the data collection window of April 15 through April 30, 2021, (2) gathered from other sources (such as FCC) that collected data from you, or (3) carried forward from prior reporting made to this Office by you under a previous Map version. Map V4 categorizes census blocks according to the facilitated speed offered within the block. The publication of V4 triggered a formal appeal window, as explained in more detail below, during which time we received this appeal. The appeal we received claims that the data reflected on V4 of the Map is inaccurate. This appeal can be found at <https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process> (see Docket Numbers 21-1011, 21-1013, 21-1030, 21-1037, 21-1038). **To resolve this matter, the Office requests that your firm provide information concerning your service in the affected Census Blocks as further identified and described below by August 11, 2021.**

On July 1, 2021, the Office officially published the final version of V4 of the Map, which identifies where Broadband service was offered or Facilitated at a tier 1, tier 2, or tier 3 speed as of July 1, 2021.¹ V4 of the Map is based primarily on data submitted to Connected Nation and/or FCC by Communication Service Providers concerning their service capabilities in the State of Iowa² and on informal comments/feedback supplied by interested parties as part of the informal comment/feedback process described above and in which your firm may have participated. V4 of the Map, and a detailed background of the same, can be found at: <https://ocio.iowa.gov/broadband-availability-map-version-4>. Overall, the new map reflects Targeted Service Areas defined as a census block within which no communications service provider offers or facilitates broadband service at or above the tier 1, tier 2, or tier 3 download and upload speeds. The tier speeds are defined as follows:

¹See Iowa Code §§ 8B.1(12), 8B.10. *See also* Iowa Admin. Code r. 129—20.1, 20.3, 20.4.

²See Iowa Admin. Code r. 129—20.3.

“**Tier 1**” means a maximum download speed of less than 25 Mbps and a maximum upload speed of less than three Mbps.

“**Tier 2**” means a minimum download speed of greater than or equal to 25 Mbps but less than 50 Mbps. No minimum upload speed is applicable for Tier 2.

“**Tier 3**” means a minimum download speed of greater than or equal to 50 Mbps but less than 80 Mbps. No minimum upload speed is applicable for Tier 3.

“**Non-TSA**” means a census block in which speeds are facilitated at greater than or equal to 80 Mbps.

Through the official publication of V4 of the Map, the Office triggered the challenge process it is required by law to administer.³ Pursuant to applicable administrative rules, within 20 days after the Office’s official publication of V4 of the Map, “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” along with all evidence or information supporting their appeal. Iowa Admin. Code r. 129—20.5(1). Specifically, interested parties were permitted to provide the Office with evidence and information of the following: broadband is unavailable from a provider listed for the area (census block); or, that broadband speed is not as advertised.

V4 of the Map currently shows that service is Facilitated at either a tier 1, tier 2, or tier 3 speed per designated census block. As part of the above-outlined process, OCIO received a formal notice of appeal and supporting evidence or information from one or more Iowa residents or Communications Service Provider, claiming that Broadband service is not offered or Facilitated at that speed tier.

At this time, the Office requests your assistance in making an accurate determination as to whether your firm facilitates broadband service at the designated speed tier for 10% or more of the geographic area of each challenged census block as of July 1, 2021 to the Census Blocks identified in Exhibit A. To that end, the Office requests that you:

- 1) Complete and return the attached Affirmation of Service or Lack of Service in Census Blocks Broadband Grants Program Broadband Availability Map Challenge Process Form (see Exhibit A, Affirmation tab), by **August 11, 2021**. Pursuant to this form, OCIO requests that a representative with legal authority to bind your firm:
 - a) Confirm that your firm Facilitated Broadband service to the Census Blocks identified in Exhibit A as of July 1, 2021, and indicate the speeds at which your firm facilitated broadband service in those blocks. For purposes of this representation, “‘Facilitate’ means a communication service provider’s ability to provide broadband service at or above the download and upload speeds specified in the definition of targeted service area in this section to a home, farm, school, or business **within a commercially reasonable time and at a commercially reasonable price upon request by a consumer.**” Iowa Code § 8B.1(5) (emphasis added).
 - b) Fully complete all other aspects of the Form.
- 2) In addition to the form, please also submit any other evidence or information in your possession to the Office that supports your prior representations to the Office regarding the Census Blocks identified in Exhibit A. Examples of evidence and information the Office would consider particularly probative include “Bills or invoices provided to or received by customers in the

³See Iowa Code § 8B.10(2); Iowa Admin. Code r. 129—20.5.

applicable census block(s) which identify the specific download and upload speeds provided or received as of [July 1, 2021].” Iowa Admin. Code r. 129—20.5(8).

Please return the completed form and any supporting evidence or information to ociogrants@iowa.gov.

Please note that you are under no legal obligation to respond to this request for information. Generally, pursuant to applicable administrative rules, any affected person or party is free to submit evidence or information to the Office in support of or in opposition to an appeal within 20 days after the appeal has been posted to ocio.iowa.gov/broadband. Iowa Admin. Code r. 129—20.5(3). However, this Office is affirmatively reaching out to notify you of the appeal, of the circumstances surrounding the appeal, and to solicit your feedback and position. If this Office does not receive your response via Exhibit A of the Form by **August 11, 2021** (10 business days from the date of this letter), the Office will make a final decision based on the evidence and information currently available to it. Iowa Admin. Code r. 129—20.5(4), (5).

OCIO strives at all times to produce and disseminate accurate information. We appreciate your assistance in helping us achieve our statutory mandate.

Sincerely,

Office of the Chief Information Officer,
State of Iowa

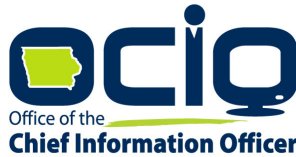


EXHIBIT A

**Affirmation of Service or Lack of Service in Census Blocks
Broadband Grants Program Broadband Availability Map Challenge Process**

A. RESPONDENT INFORMATION

Company Name	Bits of Technology Wireless Internet (dba:BTWI)
Address	1020 26th St
City	Perry
State	IA
Zip	50220

B. DESIGNATED CONTACT INFORMATION

Contact Name	Jeff Leerhoff
Contact Phone Number	515-465-3043
Contact Email	jeff@btwi.net

C. AFFIRMATION

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

Company, consistent with the representations made in this form, and regardless of whether your company's prior reporting to the FCC or State of Iowa was correct or in error, meets one of the following criteria in each of the identified census blocks as of July 1, 2021:

1. Company Facilitated service at the indicated speeds on the Affirmation tab as of July 1, 2021 to more than 10% of the census block; or
2. Company did NOT offer or Facilitate material Broadband service.

Please indicate the speeds offered for each census block on the Affirmation tab.

D. ADDITIONAL EXPLANATION(To the extent you believe additional explanation is required to ensure that you are communicating full and accurate information, please use the below space to further explain, qualify, or substantiate your above affirmation. To the extent necessary, please feel free to upload additional explanations/supporting documentation.

Please see the attached response pages for each appeal that was filed, along with supporting documentation. Note: please see attached response pages for explanation of columns added to the Affirmation spreadsheet.

E. SIGNATURE* By typing your full name you are affixing your signature to this form and attesting to the accuracy of the information submitted herein.

Authorized Signature:	Jeff Leerhoff
Title:	Co-Owner and General Manager
Date:	8/10/2021

*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 Iowa Code section 622.1 and pursuant to the laws of the state of Iowa, 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 Iowa 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 V4 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 Iowa 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 out.

Please familiarize yourself with the following terms prior to determining whether broadband service is being Facilitated to the census block.

Facilitate

A communication service provider's ability to provide broadband service at or above the download and upload speeds defined above to a home, farm, school, or business within a commercially reasonable time and at a commercially reasonable price upon request by a consumer. This does *not* pertain to the Broadband Infrastructure used to facilitate said service; Broadband Infrastructure is *not* a basis for appeal.

CENSUS BLOCK ID	Do you Facilitate service to more than 10% of the geographic area of the Census Block?	Download Speed	Upload Speed
-----------------	--	----------------	--------------

APPELANT NOTES:					
190130026031091	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026031092	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026031093	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026031094	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190130026031095	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190130026031096	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190130026031097	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026031098	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026031099	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026031100	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026031101	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026031102	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026034016	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026034037	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190130026034047	No	----	----	CFU	Decommissioned tower and equipment caused change in status

190130030021028	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190130030021033	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190130030021034	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190230705002058	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190230705002059	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190230705002066	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190230705002067	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190230705002068	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190230705002071	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190230705003000	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190230705003010	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190230705003011	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190230705003012	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190230705003059	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002001	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002002	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002007	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002008	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002009	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002010	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002012	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002013	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002018	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002020	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002021	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002022	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002023	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002027	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002028	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002029	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002038	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002041	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002044	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002045	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002047	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002057	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190490505002023	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service
190490505002079	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service

190490505002080	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002081	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002085	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002088	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002089	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002090	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002091	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002093	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002094	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002124	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002129	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002130	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001094	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M, Windstream has 100M, & Minburn has 1G service		
190779501001095	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001096	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001104	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M, Windstream has 100M, & Minburn has 1G service		
190779501001105	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001106	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001108	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001109	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001110	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001112	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001116	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001117	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001142	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001143	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190693601002009	Yes	100Mbps	50Mbps	Dumont			
190693601002010	Yes	100Mbps	50Mbps	Dumont			
190693601002025	Yes	100Mbps	50Mbps	Dumont			
190693601002031	Yes	100Mbps	50Mbps	Dumont			
190693601002034	Yes	100Mbps	50Mbps	Dumont			
190693601002036	Yes	100Mbps	50Mbps	Dumont			
190693601002038	Yes	100Mbps	50Mbps	Dumont			
190693601002039	Yes	100Mbps	50Mbps	Dumont			
190693601002053	Yes	100Mbps	50Mbps	Dumont			
190693601002054	Yes	100Mbps	50Mbps	Dumont			
190693601002068	Yes	100Mbps	50Mbps	Dumont			
190693601002071	Yes	100Mbps	50Mbps	Dumont			

190693601002072	Yes	100Mbps	50Mbps	Dumont			
190693601002073	Yes	100Mbps	50Mbps	Dumont			
190693601002074	Yes	100Mbps	50Mbps	Dumont			
190693601002076	Yes	100Mbps	50Mbps	Dumont			
190693601002079	Yes	100Mbps	50Mbps	Dumont			
190693601002080	Yes	100Mbps	50Mbps	Dumont			
190693601002082	Yes	100Mbps	50Mbps	Dumont			
190693601002084	Yes	100Mbps	50Mbps	Dumont			
190693601002088	Yes	100Mbps	50Mbps	Dumont			
190693601002096	Yes	100Mbps	50Mbps	Dumont			
190693601002097	Yes	100Mbps	50Mbps	Dumont			
190693601002098	Yes	100Mbps	50Mbps	Dumont			
190693601002099	Yes	100Mbps	50Mbps	Dumont			
190693601002110	Yes	100Mbps	50Mbps	Dumont			
190693601002112	Yes	100Mbps	50Mbps	Dumont			
190693601002116	Yes	100Mbps	50Mbps	Dumont			
190693601002118	Yes	100Mbps	50Mbps	Dumont			
190693601002119	Yes	100Mbps	50Mbps	Dumont			
190693601002122	Yes	100Mbps	50Mbps	Dumont			
190693601002124	Yes	100Mbps	50Mbps	Dumont			
190693601002127	Yes	100Mbps	50Mbps	Dumont			
190693601002128	Yes	100Mbps	50Mbps	Dumont			
190693601002131	Yes	100Mbps	50Mbps	Dumont			
190693601002138	Yes	100Mbps	50Mbps	Dumont			
190693601002139	Yes	100Mbps	50Mbps	Dumont			
190693601002140	Yes	100Mbps	50Mbps	Dumont			
190693601002142	Yes	100Mbps	50Mbps	Dumont			
190693601002144	Yes	100Mbps	50Mbps	Dumont			
190693601002151	Yes	100Mbps	50Mbps	Dumont			
190693601002153	Yes	100Mbps	50Mbps	Dumont			
190693601002159	Yes	100Mbps	50Mbps	Dumont			
190693601003017	Yes	100Mbps	50Mbps	Dumont			
190693601003018	Yes	100Mbps	50Mbps	Dumont			
190693601003019	Yes	100Mbps	50Mbps	Dumont			
190693601003020	Yes	100Mbps	50Mbps	Dumont			
190693601003024	Yes	100Mbps	50Mbps	Dumont			
190693601003026	Yes	100Mbps	50Mbps	Dumont			
190693601003028	Yes	100Mbps	50Mbps	Dumont			

190693601003030	Yes	100Mbps	50Mbps	Dumont			
190693601003033	Yes	100Mbps	50Mbps	Dumont			
190693601003292	Yes	100Mbps	50Mbps	Dumont			
190693601003293	Yes	100Mbps	50Mbps	Dumont			
190693602001086	Yes	100Mbps	50Mbps	Dumont			
190693602001092	Yes	100Mbps	50Mbps	Dumont			
					BTWI subscribers per reported census H/S/B	Range of DL speeds <u>subscribed</u> through BTWI	
190150206001212	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190150206001215	Yes	100Mbps	50Mbps	Minburn	4 of 9	20M-50M	
190150206001218	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190150206001233	Yes	100Mbps	50Mbps	Minburn	1 of 1	10M	
190150206001239	Yes	100Mbps	50Mbps	Minburn	1 of 1	30M	
190150206001240	Yes	100Mbps	50Mbps	Minburn	3 of 5	30M-50M	
190150206001241	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190150206001242	Yes	100Mbps	50Mbps	Minburn	4 of 5	20M-50M	
190150206001245	Yes	100Mbps	50Mbps	Minburn	1 of 9	20M	
190150206001247	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190150206001249	Yes	100Mbps	50Mbps	Minburn	0 of 6	-	
190150206001250	Yes	100Mbps	50Mbps	Minburn	2 of 8	10M-20M	
190150206001251	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190150206001252	Yes	100Mbps	50Mbps	Minburn	1 of 2	10M	
190150206001253	Yes	100Mbps	50Mbps	Minburn	3 of 6	10M-30M	
190150206001255	Yes	100Mbps	50Mbps	Minburn	3 of 4	20M-50M	
190150206001256	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190150206001257	Yes	100Mbps	50Mbps	Minburn	1 of 3	100M	
190150206001258	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190150206001259	Yes	100Mbps	50Mbps	Minburn	1 of 2	20M	
190150206001278	Yes	100Mbps	50Mbps	Minburn	2 of 3	50M	
190150206001279	Yes	100Mbps	50Mbps	Minburn	2 of 3	50M	
190150206001280	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190150206001281	Yes	100Mbps	50Mbps	Minburn	1 of 1	50M	
190150206001282	Yes	100Mbps	50Mbps	Minburn	1 of 2	15M	
190150206001283	Yes	100Mbps	50Mbps	Minburn	3 of 10	4M-20M	
190150206001284	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190150206001285	Yes	100Mbps	50Mbps	Minburn	7 of 14	10M-50M	
190150206001286	Yes	100Mbps	50Mbps	Minburn	35 of 41	4M-200M	

190150206001287	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190150206001288	Yes	100Mbps	50Mbps	Minburn	2 of 6	15M-50M	
190150206001289	Yes	100Mbps	50Mbps	Minburn	3 of 3	15M-50M	
190150206001290	Yes	100Mbps	50Mbps	Minburn	5 of 9	10M-50M	
190150206001291	Yes	100Mbps	50Mbps	Minburn	1 of 1	30M	
190150206001292	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190150206001293	Yes	100Mbps	50Mbps	Minburn	1 of 2	10M	
190150206001294	Yes	100Mbps	50Mbps	Minburn	3 of 3	10M-50M	
190150206001295	Yes	100Mbps	50Mbps	Minburn	3 of 5	10M-15M	
190150206001296	Yes	100Mbps	50Mbps	Minburn	3 of 3	30M-50M	
190150206001332	Yes	100Mbps	50Mbps	Minburn	2 of 3	10M-50M	
190490502002009	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490502002010	Yes	100Mbps	50Mbps	Minburn	4 of 6	15M-30M	
190490502002011	Yes	100Mbps	50Mbps	Minburn	2 of 3	15M-20M	
190490502002012	Yes	100Mbps	50Mbps	Minburn	1 of 2	20M	
190490502002013	Yes	100Mbps	50Mbps	Minburn	5 of 18	20M-50M	
190490502002014	Yes	100Mbps	50Mbps	Minburn	1 of 1	20M	
190490502002015	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502002016	Yes	100Mbps	50Mbps	Minburn	1 of 4	50M	
190490502002039	Yes	100Mbps	50Mbps	Minburn	4 of 8	20M-50M	
190490502002040	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490502002041	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490502002042	Yes	100Mbps	50Mbps	Minburn	1 of 1	50M	
190490502002043	Yes	100Mbps	50Mbps	Minburn	10 of 11	10M-50M	
190490502002044	Yes	100Mbps	50Mbps	Minburn	0 of 6	-	
190490502002046	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490502002047	Yes	100Mbps	50Mbps	Minburn	2 of 3	50M	
190490502002048	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490502002049	Yes	100Mbps	50Mbps	Minburn	2 of 10	15M-20M	
190490502002050	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490502002081	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490502002082	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502002090	Yes	100Mbps	50Mbps	Minburn	1 of 3	50M	
190490503001035	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490503003001	Yes	100Mbps	50Mbps	Minburn	0 if 1	-	
190490503003007	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490504001025	Yes	100Mbps	50Mbps	Minburn	1 of 2	50M	
190490504001029	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	

190490504001060	Yes	100Mbps	50Mbps	Minburn	1 of 1	10M	(Note: census data is incorrect)
190490504001061	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490504003004	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490504003005	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001000	Yes	100Mbps	50Mbps	Minburn	4 of 7	10M-50M	
190490505001001	Yes	100Mbps	50Mbps	Minburn	2 of 10	30M	
190490505001002	Yes	100Mbps	50Mbps	Minburn	4 of 8	10M-50M	
190490505001003	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001004	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505001006	Yes	100Mbps	50Mbps	Minburn	5 of 11	10M-50M	
190490505001009	Yes	100Mbps	50Mbps	Minburn	1 of 1	15M	
190490505001020	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505001021	Yes	100Mbps	50Mbps	Minburn	1 of 3	20M	
190490505001024	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505001027	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505001028	Yes	100Mbps	50Mbps	Minburn	2 of 5	20M-100M	
190490505001029	Yes	100Mbps	50Mbps	Minburn	1 of 1	4M	
190490505001030	Yes	100Mbps	50Mbps	Minburn	3 of 5	10M-50M	
190490505001031	Yes	100Mbps	50Mbps	Minburn	10 of 20	10M-50M	
190490505001032	Yes	100Mbps	50Mbps	Minburn	1 of 2	10M	
190490505001033	Yes	100Mbps	50Mbps	Minburn	4 of 9	15M-30M	
190490505001034	Yes	100Mbps	50Mbps	Minburn	1 of 6	20M	
190490505001045	Yes	100Mbps	50Mbps	Minburn	1 of 3	4M	
190490505001046	Yes	100Mbps	50Mbps	Minburn	3 of 3	20M-50M	
190490505001047	Yes	100Mbps	50Mbps	Minburn	2 of 4	50M	
190490505001048	Yes	100Mbps	50Mbps	Minburn	1 of 2	50M	
190490505001049	Yes	100Mbps	50Mbps	Minburn	1 of 1	10M	
190490505001050	Yes	100Mbps	50Mbps	Minburn	2 of 2	50M	
190490505001051	Yes	100Mbps	50Mbps	Minburn	4 of 7	30M-50M	
190490505001052	Yes	100Mbps	50Mbps	Minburn	5 of 6	15M-50M	
190490505001053	Yes	100Mbps	50Mbps	Minburn	4 of 10	10M-20M	
190490505001054	Yes	100Mbps	50Mbps	Minburn	2 of 7	50M	
190490505001055	Yes	100Mbps	50Mbps	Minburn	1 of 2	15M	
190490505001057	Yes	100Mbps	50Mbps	Minburn	0 of 9	-	
190490505001058	Yes	100Mbps	50Mbps	Minburn	0 of 6	-	
190490505001059	Yes	100Mbps	50Mbps	Minburn	1 of 16	15M	
190490505001060	Yes	100Mbps	50Mbps	Minburn	1 of 11	50M	
190490505001062	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	

190490505001065	Yes	100Mbps	50Mbps	Minburn	1 of 18	50M	
190490505001069	Yes	100Mbps	50Mbps	Minburn	6 of 11	20M-50M	
190490505001071	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505001073	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505001074	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490505001075	Yes	100Mbps	50Mbps	Minburn	1 of 2	15M	
190490505001076	Yes	100Mbps	50Mbps	Minburn	3 of 3	10M-50M	
190490505001077	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505001078	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505001079	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001080	Yes	100Mbps	50Mbps	Minburn	1 of 7	20M	
190490505001081	Yes	100Mbps	50Mbps	Minburn	2 of 3	10M-15M	(Note: census data is incorrect)
190490505001082	Yes	100Mbps	50Mbps	Minburn	1 of 2	10M	(Note: census data is incorrect)
190490505001083	Yes	100Mbps	50Mbps	Minburn	1 of 3	50M	
190490505001089	Yes	100Mbps	50Mbps	Minburn	2 of 4	10M	
190490505001098	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001099	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001104	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001105	Yes	100Mbps	50Mbps	Minburn	1 of 3	20M	
190490505001110	Yes	100Mbps	50Mbps	Minburn	3 of 5	4M-100M	
190490505001111	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505001112	Yes	100Mbps	50Mbps	Minburn	1 of 3	4M	
190490505001113	Yes	100Mbps	50Mbps	Minburn	2 of 3	10M-20M	
190490505001114	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505001115	Yes	100Mbps	50Mbps	Minburn	1 of 4	10M	
190490505001116	Yes	100Mbps	50Mbps	Minburn	0 of 4	-	
190490505001118	Yes	100Mbps	50Mbps	Minburn	0 of 4	-	
190490505001119	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001120	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490505001121	Yes	100Mbps	50Mbps	Minburn	3 of 6	30M-50M	
190490505001122	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490505001127	Yes	100Mbps	50Mbps	Minburn	2 of 5	30M-50M	
190490505001128	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001129	Yes	100Mbps	50Mbps	Minburn	1 of 1	20M	
190490505001130	Yes	100Mbps	50Mbps	Minburn	3 of 3	10M-30M	
190490505001134	Yes	100Mbps	50Mbps	Minburn	1 of 2	10M	
190490505001135	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490505001145	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	

190490505001146	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505001147	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505001148	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001149	Yes	100Mbps	50Mbps	Minburn	1 of 2	4M	
190490505001150	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505001168	Yes	100Mbps	50Mbps	Minburn	1 of 2	15M	
190490505001169	Yes	100Mbps	50Mbps	Minburn	2 of 4	30M	
190490505001208	Yes	100Mbps	50Mbps	Minburn	3 of 13	15M-50M	
190730801001117	Yes	100Mbps	50Mbps	Minburn	1 of 1	50M	
190730801001119	Yes	100Mbps	50Mbps	Minburn	1 of 2	10M	
190730801001120	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190730801001153	Yes	100Mbps	50Mbps	Minburn	1 of 1	15M	
190730801001155	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190730801001159	Yes	100Mbps	50Mbps	Minburn	1 of 2	20M	
190730801001161	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190730801001167	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490501003037	Yes	100Mbps	50Mbps	Minburn	2 of 6	50M	
190490501003038	Yes	100Mbps	50Mbps	Minburn	0 of 9	-	
190490501003055	Yes	100Mbps	50Mbps	Minburn	0 of 9	-	
190490501003061	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490501003062	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490501004031	Yes	100Mbps	50Mbps	Minburn	1 of 32	20M	
190490501004032	Yes	100Mbps	50Mbps	Minburn	0 of 19	-	
190490501004034	Yes	100Mbps	50Mbps	Minburn	0 of 13	-	
190490501004035	Yes	100Mbps	50Mbps	Minburn	1 of 11	15M	
190490501004041	Yes	100Mbps	50Mbps	Minburn	6 of 16	20M-50M	
190490501004042	Yes	100Mbps	50Mbps	Minburn	1 of 3	10M	
190490501004043	Yes	100Mbps	50Mbps	Minburn	0 of 7	-	
190490502001000	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502001002	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502001003	Yes	100Mbps	50Mbps	Minburn	0 of 6	-	
190490502001004	Yes	100Mbps	50Mbps	Minburn	1 of 9	20M	
190490502001032	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490502001035	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490502001036	Yes	100Mbps	50Mbps	Minburn	0 of 6	-	
190490502001037	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490502001038	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490502001039	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	

190490502001040	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490502001041	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490502001042	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490502001043	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502001044	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490502001045	Yes	100Mbps	50Mbps	Minburn	0 of 7	-	
190490502001046	Yes	100Mbps	50Mbps	Minburn	1 of 1	10M	
190490502001047	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490502001048	Yes	100Mbps	50Mbps	Minburn	0 of 14	-	
190490502001051	Yes	100Mbps	50Mbps	Minburn	0 of 10	-	
190490502001056	Yes	100Mbps	50Mbps	Minburn	1 of 13	20M	
190490502001057	Yes	100Mbps	50Mbps	Minburn	1 of 1	20M	
190490502001064	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502001065	Yes	100Mbps	50Mbps	Minburn	0 of 4	-	
190490502001066	Yes	100Mbps	50Mbps	Minburn	0 of 7	-	
190490502002093	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490502002094	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502003000	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490502003002	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502003003	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001170	Yes	100Mbps	50Mbps	Minburn	1 of 16	50M	
190490505001171	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001172	Yes	100Mbps	50Mbps	Minburn	0 of 4	-	
190490505001176	Yes	100Mbps	50Mbps	Minburn	1 of 4	15M	
190490505001177	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490505001178	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505001179	Yes	100Mbps	50Mbps	Minburn	2 of 4	50M	
190490505001182	Yes	100Mbps	50Mbps	Minburn	0 of 4	-	
190490505002001	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505002002	Yes	100Mbps	50Mbps	Minburn	3 of 9	10M-30M	
190490505002004	Yes	100Mbps	50Mbps	Minburn	2 of 4	20M	
190490505002005	Yes	100Mbps	50Mbps	Minburn	2 of 4	20M-50M	
190490505002006	Yes	100Mbps	50Mbps	Minburn	3 of 4	4M-50M	
190490505002007	Yes	100Mbps	50Mbps	Minburn	1 of 2	50M	
190490505002008	Yes	100Mbps	50Mbps	Minburn	5 of 9	20M-30M	
190490505002048	Yes	100Mbps	50Mbps	Minburn	2 of 2	15M	
190490505002049	Yes	100Mbps	50Mbps	Minburn	2 of 4	15M-50M	
190490505002051	Yes	100Mbps	50Mbps	Minburn	1 of 3	50M	

190490505002052	Yes	100Mbps	50Mbps	Minburn	1 of 1	4M	
190490505002053	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505002057	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505002058	Yes	100Mbps	50Mbps	Minburn	2 of 4	30M	
190490505002059	Yes	100Mbps	50Mbps	Minburn	1 of 2	30M	
190490505002060	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505002061	Yes	100Mbps	50Mbps	Minburn	3 of 4	15M-30M	
190490505002062	Yes	100Mbps	50Mbps	Minburn	1 of 6	50M	
190490505002063	Yes	100Mbps	50Mbps	Minburn	0 of 7	-	
190490505002064	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490505002065	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490505002066	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490505002070	Yes	100Mbps	50Mbps	Minburn	1 of 6	20M	
190490505002071	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505002072	Yes	100Mbps	50Mbps	Minburn	1 of 1	50M	
190490505002073	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505002074	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505002076	Yes	100Mbps	50Mbps	Minburn	0 of 4	-	
190490505002077	Yes	100Mbps	50Mbps	Minburn	1 of 4	15M	
190490505002119	Yes	100Mbps	50Mbps	Minburn	0 of 4	-	
190490505002120	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490505002122	Yes	100Mbps	50Mbps	Minburn	2 of 7	50M	
190490505002128	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490507001003	Yes	100Mbps	50Mbps	Minburn	1 of 10	50M	

BTWI

Response to Appeals Regarding OCIO Broadband Availability Map v4

Regarding Cedar Falls Utilities appeal:

Cedar Falls Utilities questioned the ability of our company to provide broadband service in the census blocks which they challenged. To an extent, they are correct.

Within the last few months (after submitting information for Map v4), the reliability of a tower structure became a concern and it was decided to decommission its use as an access point for our fixed wireless broadband.

This affected many of the census blocks that are in CFU's appeal. Others are still serviced by other broadcast point locations, however at a lesser speed level.

BTWI has made modifications on the Affirmation Form reflecting these changes.

BTWI

Response to Appeals Regarding OCIO Broadband Availability Map v4

Regarding Panora Telephone appeal:

Panora Telephone challenged 28 census blocks concerning BTWI. These census blocks were on the outside fringes of our coverage territory near their area of concern.

BTWI utilizes an industry leading propagation map service to determine the fixed wireless footprint from each of our 70+ tower/broadcast locations. I personally reviewed these propagation maps in detail pertaining to these census blocks.

Upon review, there were some census blocks that may have reduced fixed wireless coverage due to in-town obstructions.

BTWI has made modifications on the Affirmation Form reflecting these changes.

Special Note:

All of the census blocks that Panora Telephone listed on our challenge form (and they believe should be at a Tier 1 level) are listed on the OCIO Map v4 as being served by themselves (Panora Communications Fixed Wireless) at a Tier 3 level (50M/15M).

All of them also show Windstream fixed wireless offered at 100M/8M. I believe this was through a Windstream service deployment using CAFII funds. A few of these census blocks even show Panora Telecommunications Fiber at 1000M/250M and/or Minburn Telephone Fiber at 1000M/1000M.

BTWI

Response to Appeals Regarding OCIO Broadband Availability Map v4

Regarding Dumont Telephone appeal:

Dumont Telephone Company presented a detailed 16-page Fixed Wireless Challenge which outlines the challenges faced in providing fixed wireless broadband. Every type of broadband infrastructure faces numerous challenges, even FTTP. This Fixed Wireless Challenge attempts to use a broad paintbrush for all wireless communication to address a very complex technology.

Even the documentation which they provided from Everett Kingery P.E. of HunTel Engineering has disclaimers. As stated on page 6 of the document: "NOTE: This configuration does not represent the actual configuration for these locations, but is being used for demonstration purposes only." And on page 16: "The performance for a wireless network can not be given in general terms, covering a large area. Each location needs to be evaluated on its own."

Fixed wireless has been used successfully for many years to bring broadband efficiently and effectively to rural locations and communities. Even today, much larger companies such as Google, Microsoft, Windstream, AT&T, and others are deploying fixed wireless technology to help bridge the digital divide.

A properly designed and managed fixed wireless network can (and does) provide the speed offerings reported to the OCIO in a reliable, consistent manner.

Dumont Telephone Company fails to provide any direct, substantiated evidence that the speeds claimed to be offered in these census blocks are not available to the consumer. Their challenge is simply an attack on a form of technology which differs from theirs.

And as OCIO clearly states: "Broadband Infrastructure is NOT a basis for appeal."

BTWI stands by the information as reported.

BTWI

Response to Appeals Regarding OCIO Broadband Availability Map v4

Regarding Minburn Telephone appeal:

BTWI was challenged by Minburn Telephone on 243 census blocks. Of those challenged blocks, 11% (27 of the 243) had Households/Businesses/Schools listed as "0" on the OCIO Map v4, so are effectively irrelevant.

As noted in their challenge, "Mediacom, CenturyLink, and Windstream are also claiming to provide broadband services in the area with each covering less than 5% and 48% respectively." I will note that BTWI provides broadband service to 100% of these census blocks as we reported to Connected Nation for the OCIO Map v4, in addition to FCC 477 filings. I assume this is the reason for targeting BTWI in their challenge documents.

Minburn Telephone is using inaccurate, outdated, and manipulated information in an attempt to support their own agenda to get funding to overrun areas which are already adequately served with high-speed broadband, and have been for years.

I will address each portion of their documents in the order presented:

Dallas County Information: Information provided by HR Green and the Greater Des Moines Partnership

This is data collected from consumers performing their own speed tests at home. The information presented here is highly flawed because, at best, it could only consider the reported speeds that consumers are subscribed to, not what they are capable of receiving. In addition to that:

- 1) there are potential home wifi router issues
- 2) tests taken by devices with a poor wifi signal from their home router report poor results
- 3) there may be other online applications using bandwidth running in the background on the device performing the test
- 4) other devices (other than the device running the test) could be simultaneously running applications using bandwidth on the home network being tested
- 5) there is possible internet congestion after leaving their internet service provider's own network
- 6) there may be problems with the online speed test website's own servers which can report erroneous results.

All of these considerations and vulnerabilities render their information as highly flawed at the very least, and potentially extremely inaccurate.

I have included a transcript of a portion of a Zoom meeting that I attended which was presented by HR Green and the Greater Des Moines Partnership concerning the information that they collected (which Minburn Telephone referenced as supporting material for their claim). In it, a representative from HR Green was questioned about the accuracy and fallibility of their information. The representative skirted the question and struggled to come up with a sufficient response. A direct answer was never given. (I have not included the actual video clip of this due to potential privacy concerns. I will make it available to OCIO at their specific request.)

Perry Rural Research: Information provided by CheckPoint Solutions

Minburn's data mining process (conducted by CheckPoint Solutions) provides absolutely no information as to how it was performed or what qualifications and parameters were used to ensure the accuracy of the reported information. And there is no explanation of the "data collected from Minburn's the crowd sourcing tool." or how it was collected.

At a minimum, the data does not take into account **predetermined speed limitations** based on the customer's **subscribed** package with their internet service provider. In addition to that:

(please see the 6 items listed previously)

All of these considerations and vulnerabilities render their information as highly flawed at the very least, and potentially extremely inaccurate.

Also, **if** the CheckPoint Solutions data happened to be mined from online speed test servers, consumers typically only run speed tests when they are periodically having a performance issue (no matter what the source of the issue), which would cause a misrepresentation of their typical performance and speeds.

Bits of Technology Wireless Internet Challenge: Analysis of marketing, offering claims, and technical arguments

Minburn Telephone took it upon themselves to photograph and document BTWI's wireless equipment at a site at which they also broadcast fixed wireless. The author proceeds to explain assumptions regarding the limitations of total subscribers (4-6 or 2-3) of each of our access point broadcast equipment (even though they are using similar equipment with more subscribers per access point than they are indicating in this text).

It all boils down to two simple words that they use: "**if dedicated**". In a nutshell, "Dedicated internet" means each household has a dedicated, direct connection out to the internet through their service provider, so that 100% of the customers can receive 100% of their subscribed speed 100% of the time. Your service provider would need to purchase an internet feed with high enough committed capacity to handle this, along with having a dedicated connection for your use only.

No residential internet service provider that I'm aware of provides "dedicated" internet service across their entire network, including FTTP providers. It would be extremely expensive and is usually reserved for large businesses, large metro hospitals, etc.

Because no one uses 100% of their subscribed bandwidth 24 hours a day, 7 days a week, residential internet providers rely on a calculation called "Oversubscription Ratio". A well-managed internet provider (such as BTWI) monitors overall bandwidth usage per customer and patterns in daily usage. This assures that there is always enough bandwidth for all customers when they need it. And with faster speeds available, users are also on and back off the internet quicker.

In the equipment example that Minburn Telephone used, the number of **actual** typical subscribers per access point is 30-35 **in a real-life scenario**. If the threshold is reached where more access points are needed, they are added if/when that happens. BTWI currently has one tower site with 14 wireless access points.

Concerning BTWI's Part 90 license, Minburn Telephone is correct that we have multiple locations properly registered with the FCC. They are also correct that these licenses will be expiring in early 2022. What they do not have at their disposal is knowing that BTWI has been working for over a year to convert these locations to other equipment. With only 3 subscribers left to go, this process should be completed in the next 30-45 days, well ahead of any deadlines.

Regarding the direct mail postcard that was presented, this is an outdated marketing piece that is no longer used.

Residential Affidavits: (please read the notes below)

Eileen Splendore (affidavit regarding CenturyLink): Per a BTWI site survey, this address is serviceable by BTWI, however our records (dating back to January 1, 2018) show that this declarant has never inquired about getting service with us.

Cindy Sohn (affidavit regarding CenturyLink): This is a current customer of BTWI subscribed to a 50M/16M plan.

Daniel Spellman (affidavit regarding CenturyLink): Has contacted us about service. When a technician stopped in June of 2021 to do a site survey, they were turned away.

Cliff Fagen (affidavit regarding BTWI): This address is serviceable by BTWI. Per our phone records of the call, he was offered all plan levels however was recommended the two that he has listed due to his acknowledging limited usage. He also declined a free, no obligation site survey.

Kent Scheib (affidavit regarding CenturyLink): This is a current BTWI customer subscribed to a 50M/16M plan.

David Wambold (affidavit regarding Minburn Comm.): Unknown

Eric Ash (affidavit regarding CenturyLink): This is a current BTWI customer subscribed to a 20M/6M plan.

John Cavanaugh (affidavit regarding BTWI): This is a current customer of BTWI subscribed to a 50M/16M plan. Unknown at this time if he can receive the 100M/50M plan if he so desires, however it is available in other parts of the same census block.

Ray Knapp (affidavit regarding Mediacom): **Does not reside in a census block that is part of this challenge.**

David/Terri Redig (affidavit regarding Minburn Comm.): This address is serviceable by BTWI, however our records (dating back to January 1, 2018) show that this declarant has never inquired about getting service with us.

Amy Peterson (affidavit regarding Viasat): **Does not reside in a census block that is part of this challenge.**

Robert D Davis (affidavit regarding Johnston Com.): **Does not reside in a census block that is part of this challenge.**

Jerry/Kelly Bossard (affidavit regarding Minburn Comm.): This address is serviceable by BTWI, however our records (dating back to January 1, 2018) show that this declarant has never inquired about getting service with us.

Tim Bryte (affidavit regarding Minburn Comm.): **Does not reside in a census block that is part of this challenge.**

IN SUMMARY:

I have completed the Affirmation Form affirming 100M/50M service offered to more than 10% of the geographic area of each census block challenged by Minburn Telephone. BTWI utilizes an industry leading propagation map service to determine fixed wireless footprint from each tower/broadcast locations. I have personally reviewed our propagation maps in detail pertaining to these census blocks.

To help substantiate BTWI's response, I have added columns to the Affirmation spreadsheet showing:

- 1) The number of BTWI subscribers per Map v4 Household/School/Business reported in that block.
- 2) The range of download speeds that are subscribed to by our customers in that block.

My intent is to show the large market share that BTWI has in these challenged census blocks along with demonstrating that our subscribers choose a variety of speed plans (from as low as 4Mbps up to 100Mbps). You will likely note that some areas show a higher market penetration than others due to offering internet service there for over 10 years, while others are more recently served as our company has grown and expanded.

To further substantiate our offerings, I have included a sampling of subscriber invoices (with name and street number removed for privacy). With a grand total of 378 census blocks challenged, it was not practical to obtain invoices throughout all those areas.

Also included are screenshots of various speed test results with notes as to which plan that customer was subscribed to. You will notice that the speed exceeds the plan that's noted. It's BTWI's standard practice to regulate a customer's speed at approximately 20% higher than their selected speed plan to assure they receive the

speed that they're subscribed to. (This does not apply to the 100M/50M or above plans.) Also, I would like to point out the stability of the lines on the speed test.

Even though we offer 100M download service, we have had very few subscribers choose that option due to lack of want/need for that speed. We provide free consultation with our customers to assist them in determining their internet needs, which helps them avoid needless overspending to purchase more speed than they really need.

BTWI has been providing quality high-speed fixed wireless broadband to most of this challenged area for 9-12 years. It is the heart of our coverage territory, and our employees live in these same areas. We are fortunate to have a highly qualified network engineer/designer who also gleans assistance from outside industry professionals. When starting out, we were on the cutting edge with offering 5Mbps when no one else was. Now we're proud to maintain that cutting edge position by offering 100Mbps for those who need it.

Fixed wireless has been used successfully for many years to bring broadband efficiently and effectively to rural locations and communities. Even today, much larger companies such as Google, Microsoft, Windstream, AT&T, and others are deploying fixed wireless technology to bridge the digital divide.

Over the past number of years, a lot of small town/local telephone companies tried to jump on the bandwagon and expand their coverage footprint by experimenting with fixed wireless deployments. Many eventually realized that they lacked the appropriate knowledge, education, and training to be successful. In simple terms, it was out of their normal wheelhouse of operations. Many failed to properly upgrade their equipment with the latest technologies and/or discontinued the fixed wireless portion of their business leaving those customers struggling for reliable internet service.

Now they are downplaying, and sometimes even belittling, the efforts and effectiveness of the fixed wireless providers who specialize in this area of broadband deployment. In the case of Minburn Communications (from information that we've been able to ascertain), they currently have fixed wireless deployed at 3 broadcast locations. In comparison, BTWI expertly maintains a complex fixed wireless network with over 70 broadcast locations.

In fact, BTWI currently provides fixed wireless service to over 10% of a small rural community where FTTP has been in place for over 10 years. A testimonial letter is included for your review.

Over the past number of months, Minburn Communications has executed a highly publicized media, web, and door-to-door campaign soliciting responses from consumers of underserved internet needs. It appears that they only received (or at least submitted) 10 responses out of 945 household/schools/businesses in the census blocks which they challenged. This alone should provide evidence that these areas are adequately served. This is also a testament of BTWI's abilities to serve these areas.

As noted in my introduction, Minburn Telephone is using inaccurate, outdated, and manipulated information in an attempt to support their own agenda to get funding to overrun areas which are already adequately served with high-speed broadband, and have been for years. Unfortunately, this illustrates a poorly orchestrated attempt to attack BTWI for the commitment and effort we've made over the past 12 years to bring high-speed broadband to unserved/underserved areas.

Respectfully Submitted,



Jeff Leerhoff, Co-Owner and General Manager

Transcript from Zoom meeting hosted by Greater Des Moines Partnership and HR Green. I certify that this transcript is an accurate representation of a short unedited clip at the end of the meeting held at 3pm on July 9th, 2021.


Jeff Leerhoff

Speaker 1 (representative from Greater Des Moines Partnership)

Great any....any other...any other thoughts for us, we won't keep everybody if we don't need to, but we appreciate people jumping up quickly for this call. And is...

Speaker 2 (participant of meeting)

Hey (name)....

Speaker 1 (representative from Greater Des Moines Partnership)

(name), do you have a question?

Speaker 2 (participant of meeting)

Yeah I got...I got a question 'cause I find it...um...curious when I look at some of the details I can tell you that there's a lot of market there that I can guarantee it has one gig service where you've got down as basically non-service under 25 megs so what I'm assuming is those...is that data from somebody using a cell phone or somebody choosing a much lower level of broadband speed and doin' the testing versus what's actual available in the market? 'Cause it is what's available in the market, not what people are subscribing to.

Speaker 3 (representative from HR Green)

(name), great question and I appreciate that. (unintelligible)

Um...there...the...um...(long pause)...you know it...it.... (name), these are just...ah...so...so...there...how...how I.....I really appreciate your question because it really does...it is part of this grant process.

So one...ah...we...we do encourage...ah, and we've..... I've said this in several different forums, but I don't think I said it here, so that's another reason I appreciate your question (name).

Um.....it is...um...it is good to look for the...ah...the...the reason why we did this cluster map is because it's...it's good to look at the...ah.....not just the one off's or not just the...um...the...areas...um....you know, that there's five green and then one red 'cause I mean that speaks to your point. I mean, that could be that they took it from their cell phone or it could be that they need to check their router, right? I mean...you know...we all know there's different things that can happen with that. (chuckles)

This is meant mainly to say, if...if there's...you know...clusters where it's not showing...ah...what we're...and...and this is just actual speed data, so if there's clusters where actual speed data is showing a certain way, then it...it...then that's information that could be used to kind of dig into and whoever would want to look at that and do that to dig into. OK, so...is... and (name) it could be the point of...ah...is it there's good speed on one side of the street but not on the other? You know? Or is it...is it...you know...it that there's speed that's out at the end of a certain...you know...DSL line or somethin' and gets passed that, and...you know...because that's what...that's what the state will look at to say....oh OK. So yes, there is a street here...um...and there could be gray all around it, but there's a street here.

Um and...and then they'll look at...is there a reason why that street isn't served...is there...is...is it truly not served, or was it just...you know...that they'll look at those things to say is that...um...you know...is...is that really an area that for whatever reason...ah...didn't get served.

So (name), I think the...the...answer to your question is in the granularity of the data. Um and...that's...that's what the state will look at. Great question.

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Aug 1, 2021 - Aug 31, 2021

Due Date
Aug 1, 2021

Total amount due
\$0.00

Invoice
30606

[REDACTED]
[REDACTED] V AVE
DALLAS CENTER, IA 50063

Account number 1247206

Current Charges	\$100.00
Taxes/Fees	\$0.00
Credits	\$0.00
Payments Applied	\$100.00

SEE BACK OF PAGE FOR DETAILS

Total due on Aug 1, 2021 **\$0.00**

Customer Service

Call us at (515) 465-3043

Visit us at <http://www.btwi.net>

A fee of \$5.00 will be applied 7 days after the due date to any unpaid invoices.

Current Charges

Up to 50.0Mbps **\$100.00**

Payments Applied

Payment on Aug 1, 2021 **\$100.00**

Total Amount Due

\$0.00

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Aug 1, 2021 - Aug 31, 2021

Due Date
Aug 1, 2021

Total amount due
\$0.00

Invoice
30635

[REDACTED]
[REDACTED] 200TH ST
DALLAS CENTER, IA 50063

Account number 1247326

Current Charges	\$102.00
Taxes/Fees	\$0.00
Credits	\$0.00
Payments Applied	\$102.00

SEE BACK OF PAGE FOR DETAILS

Total due on Aug 1, 2021 \$0.00

Customer Service

Call us at (515) 465-3043

Visit us at <http://www.btwi.net>

A fee of \$5.00 will be applied 7 days after the due date to any unpaid invoices.

Current Charges

Up to 50.0Mbps	\$100.00
Printed Invoice	\$2.00

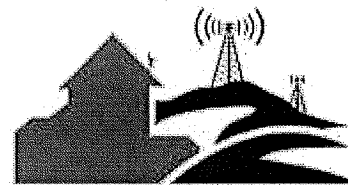
Payments Applied

Payment on Jul 10, 2021	\$102.00
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Total Amount Due

\$0.00

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Aug 1, 2021 - Aug 31, 2021

Due Date
Aug 1, 2021

Total amount due
\$0.00

Invoice
29731

[REDACTED]
[REDACTED] 332ND PL
PERRY, IA 50220

Account number 841439

Current Charges	\$245.00
Taxes/Fees	\$0.00
Credits	\$0.00
Payments Applied	\$245.00

SEE BACK OF PAGE FOR DETAILS

Total due on Aug 1, 2021 **\$0.00**

Customer Service

Call us at (515) 465-3043

Visit us at <http://www.btwi.net>

A fee of \$5.00 will be applied 7 days after the due date to any unpaid invoices.

Current Charges

Business Pricing-200Mbps/100Mbps (Includes 1 Static IP) **\$245.00**

Payments Applied

Payment on Aug 9, 2021 **\$245.00**

Total Amount Due

\$0.00

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Aug 1, 2021 - Aug 31, 2021

Due Date
Aug 1, 2021

Total amount due
\$0.00

Invoice
29968

[REDACTED]
[REDACTED] 329TH PL
PERRY, IA 50220

Account number 1171066

Current Charges	\$110.00
Taxes/Fees	\$0.00
Credits	\$0.00
Payments Applied	\$110.00

SEE BACK OF PAGE FOR DETAILS

Total due on Aug 1, 2021 **\$0.00**

Customer Service

Call us at (515) 465-3043

Visit us at <http://www.btwi.net>

A fee of \$5.00 will be applied 7 days after the due date to any unpaid invoices.

Current Charges

Up to 50.0Mbps	\$100.00
Static IP Address	\$10.00

Payments Applied

Payment on Aug 1, 2021	\$110.00
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Total Amount Due

\$0.00

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Aug 1, 2021 - Aug 31, 2021

Due Date
Aug 1, 2021

Total amount due
\$0.00

Invoice
29943

[REDACTED]
[REDACTED] J AVE
ADEL, IA 50003

Account number 1136817

Current Charges	\$105.00
Taxes/Fees	\$0.00
Credits	\$0.00
Payments Applied	\$105.00

SEE BACK OF PAGE FOR DETAILS

Total due on Aug 1, 2021 **\$0.00**

Customer Service

Call us at (515) 465-3043

Visit us at <http://www.btwi.net>

A fee of \$5.00 will be applied 7 days after the due date to any unpaid invoices.

Current Charges

Monthly Router Service Plan (Standard)	\$5.00
Up to 50.0Mbps	\$100.00

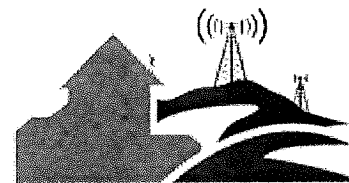
Payments Applied

Payment on Aug 3, 2021	\$105.00
------------------------	----------

Total Amount Due

\$0.00

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Aug 1, 2021 - Aug 31, 2021

Due Date
Aug 1, 2021

Total amount due
\$0.00

Invoice
30512

[REDACTED]
[REDACTED] 280TH STREET
ADEL, IA 50003

Account number 1246884

Current Charges	\$105.00
Taxes/Fees	\$0.00
Credits	\$0.00
Payments Applied	\$105.00

SEE BACK OF PAGE FOR DETAILS

Total due on Aug 1, 2021 **\$0.00**

Customer Service

Call us at (515) 465-3043

Visit us at <http://www.btwi.net>

A fee of \$5.00 will be applied 7 days after the due date to any unpaid invoices.

Current Charges

Up to 50.0Mbps	\$100.00
Monthly Router Service Plan (Standard)	\$5.00

Payments Applied

Payment on Aug 1, 2021	\$105.00
------------------------	----------

Total Amount Due

\$0.00

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Sep 1, 2021 - Sep 30, 2021

Due Date
Sep 1, 2021

Total amount due
\$105.00

Invoice
31862

[REDACTED]
[REDACTED] 170TH ST
[REDACTED]
GRANGER, IA 50109

Account number 1247375

Current Charges	\$105.00
Taxes/Fees	\$0.00
Credits	\$0.00
Payments Applied	\$0.00

SEE BACK OF PAGE FOR DETAILS

Total due on Sep 1, 2021 \$105.00

Customer Service

Call us at (515) 465-3043

Visit us at <http://www.btwi.net>

A fee of \$5.00 will be applied 7 days after the due date to any unpaid invoices.

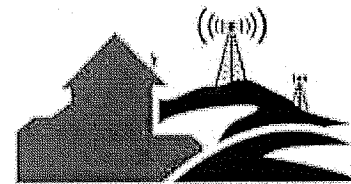
Current Charges

Monthly Router Service Plan (Standard)	\$5.00
Up to 50.0Mbps	\$100.00

Total Amount Due

\$105.00

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Aug 1, 2021 - Aug 31, 2021

Due Date
Aug 1, 2021

Total amount due
\$0.00

Invoice
30372

[REDACTED]
[REDACTED] U AVE
WOODWARD, IA 50276

Account number 1246392

Current Charges	\$100.00
Taxes/Fees	\$0.00
Credits	\$0.00
Payments Applied	\$100.00

SEE BACK OF PAGE FOR DETAILS

Total due on Aug 1, 2021 **\$0.00**

Customer Service

Call us at (515) 465-3043

Visit us at <http://www.btwi.net>

A fee of \$5.00 will be applied 7 days after the due date to any unpaid invoices.

Current Charges

Up to 50.0Mbps **\$100.00**

Payments Applied

Payment on Jul 29, 2021 **\$100.00**

Total Amount Due

\$0.00

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Aug 1, 2021 - Aug 31, 2021

Due Date
Aug 1, 2021

Total amount due
\$0.00

Invoice
30636

██████████
██████████ MADISON ST.
WINTERSET, IA 50273

Account number 1247328

Current Charges	\$185.00
Taxes/Fees	\$0.00
Credits	\$0.00
Payments Applied	\$185.00

SEE BACK OF PAGE FOR DETAILS

Total due on Aug 1, 2021 **\$0.00**

Customer Service

Call us at (515) 465-3043

Visit us at <http://www.btwi.net>

A fee of \$5.00 will be applied 7 days after the due date to any unpaid invoices.

Current Charges

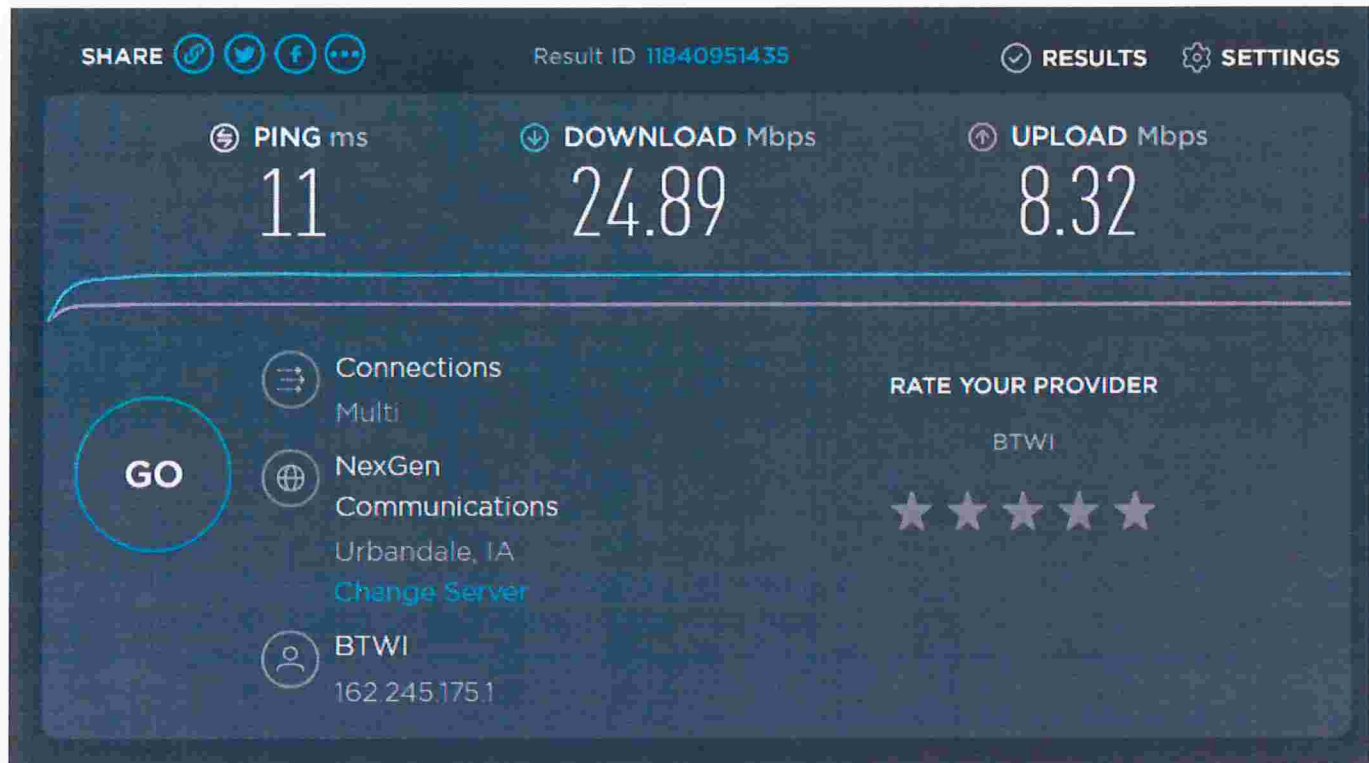
Business Pricing-100Mbps/50Mbps (Includes 1 Static IP)	\$185.00
--	----------

Payments Applied

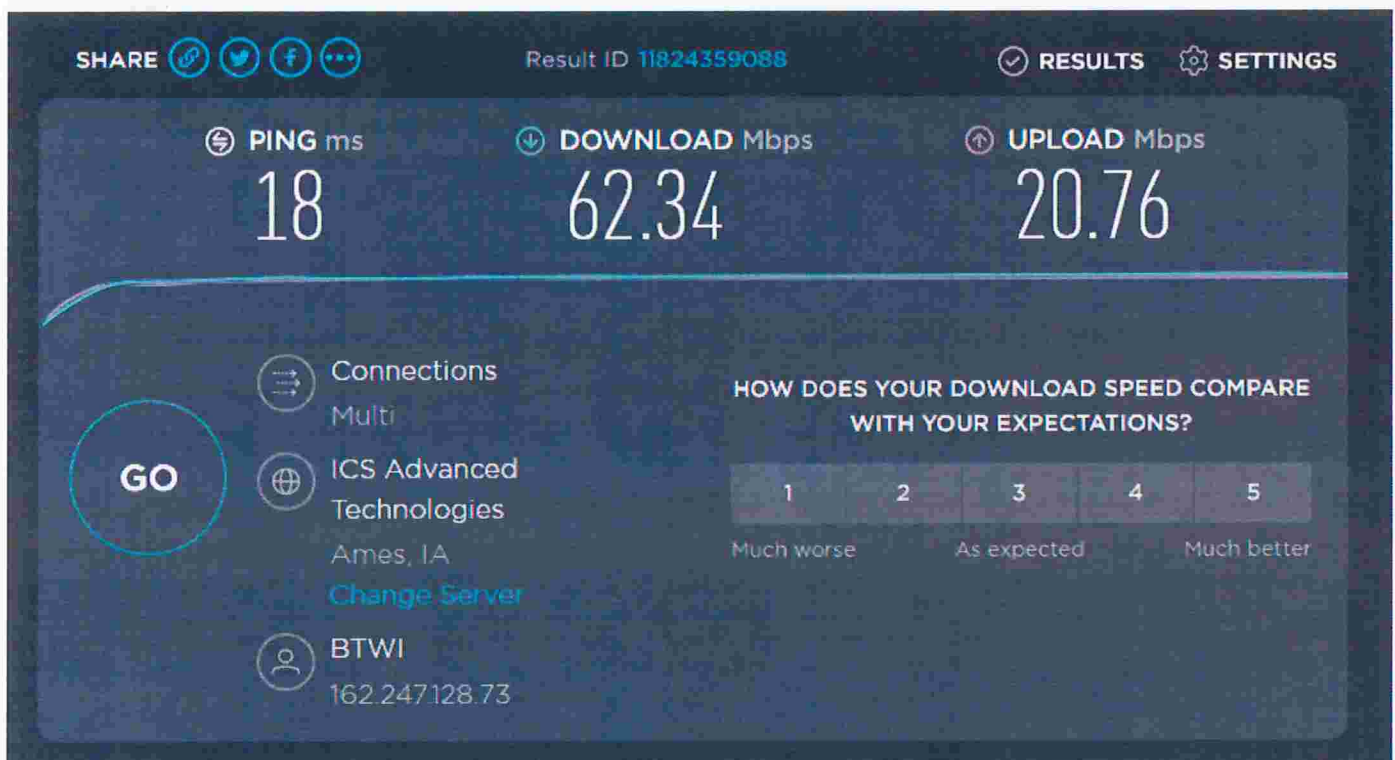
Payment on Aug 9, 2021	\$185.00
------------------------	----------

Total Amount Due

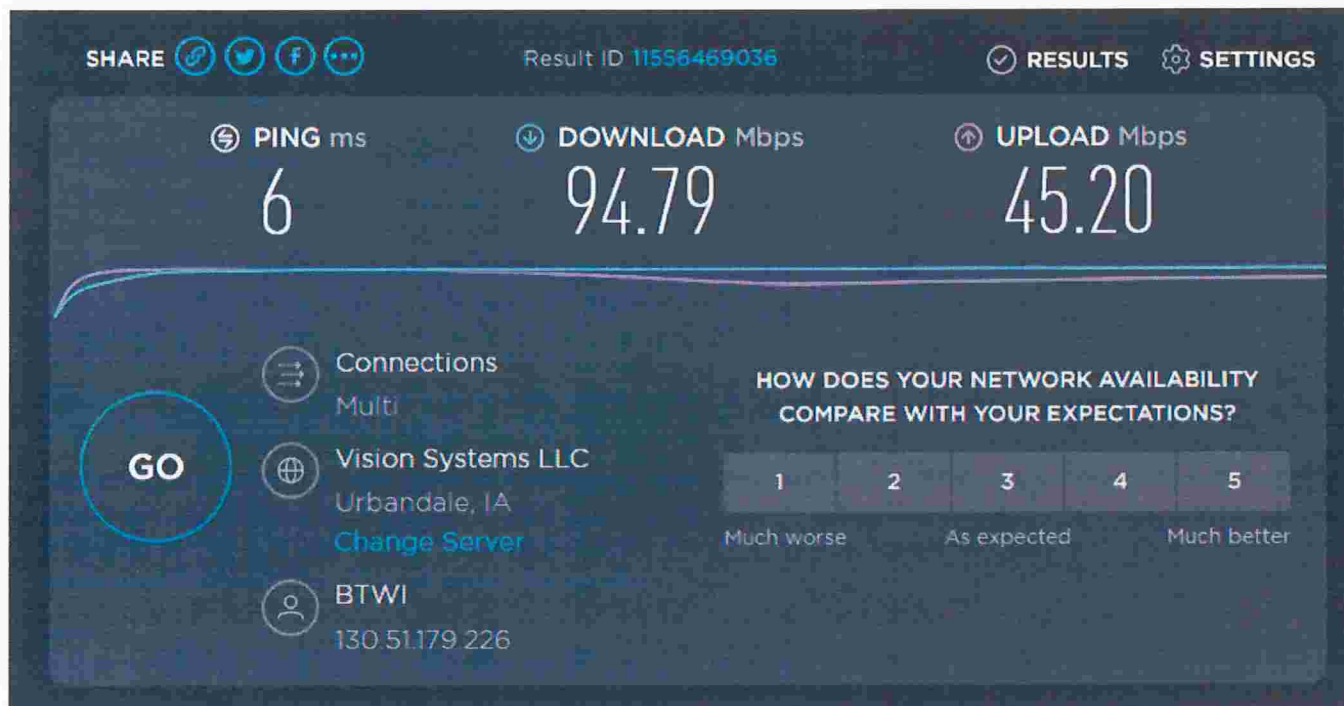
\$0.00



I certify that these results are from an actual speed test across BTWI's network taken from a subscriber's equipment who was subscribed to a 20Mbps plan. *Jeff Heenrich*

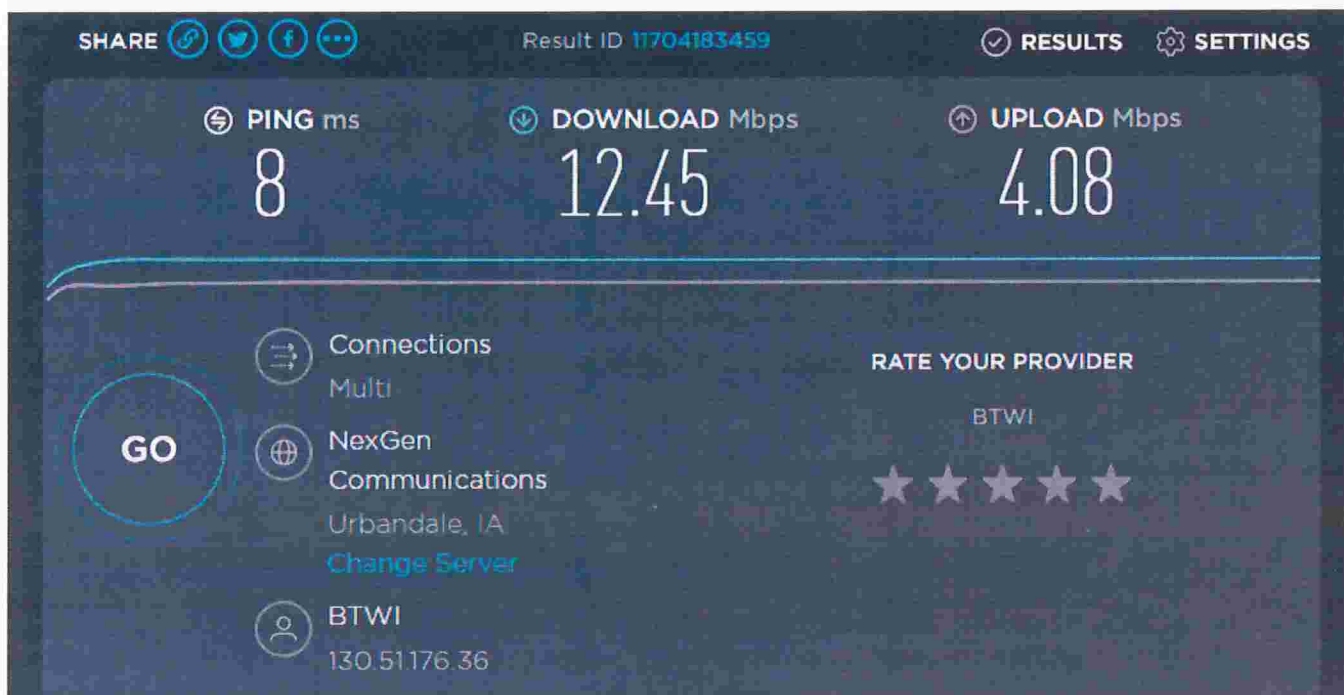


I certify that these results are from an actual speed test across BTWI's network taken from a subscriber's equipment who was subscribed to a 50Mbps plan. *Jeff Heenrich*



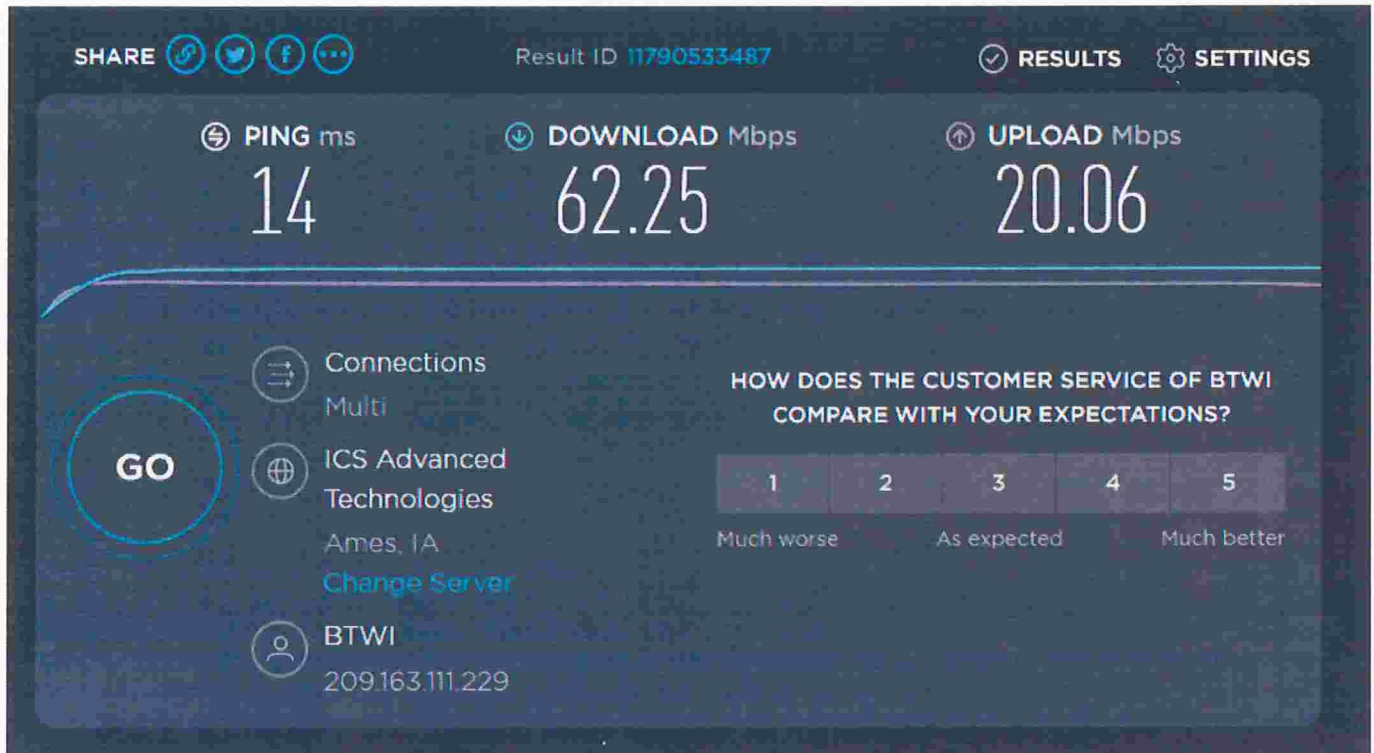
I certify that these results are from an actual speed test across BTWI's network taken from a subscriber's equipment who was subscribed to a 100Mbps plan.

Giff Seerhoff



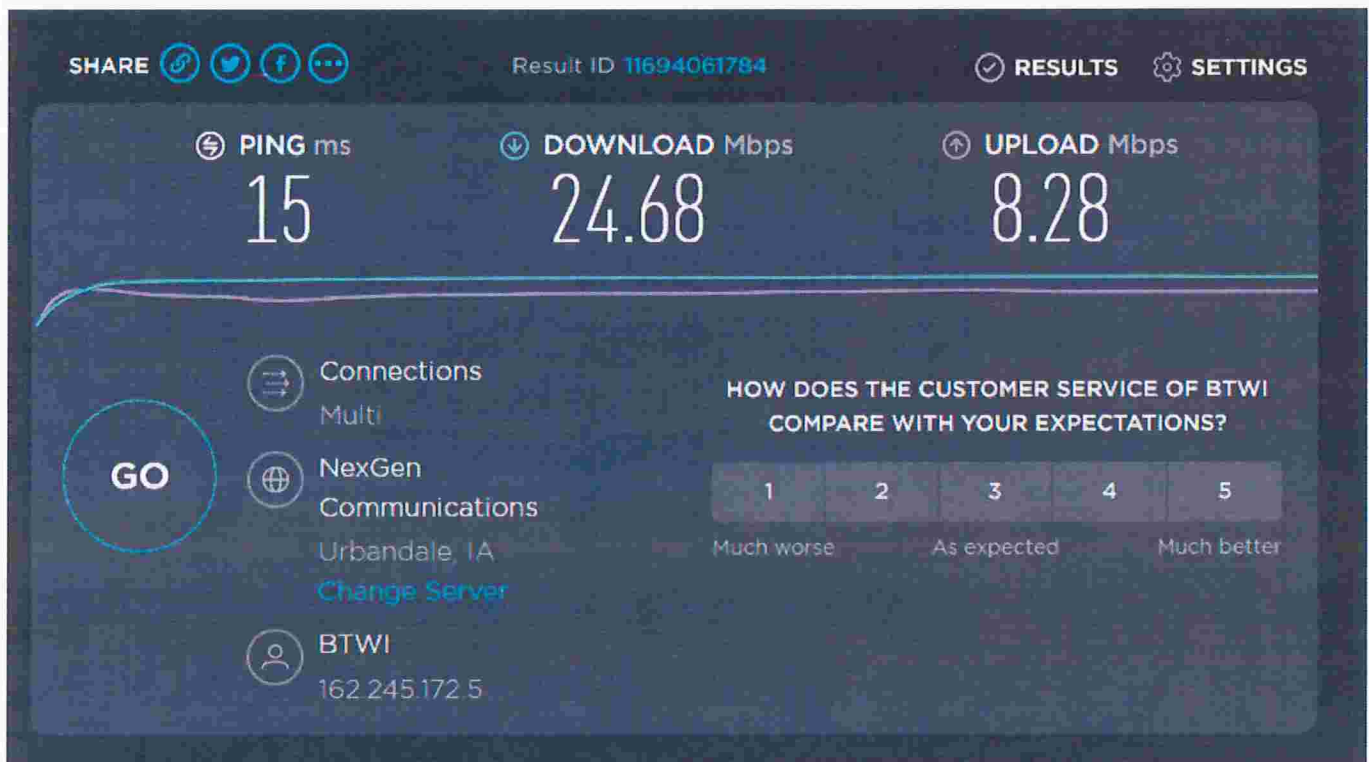
I certify that these results are from an actual speed test across BTWI's network taken from a subscriber's equipment who was subscribed to a 10Mbps plan.

Giff Seerhoff



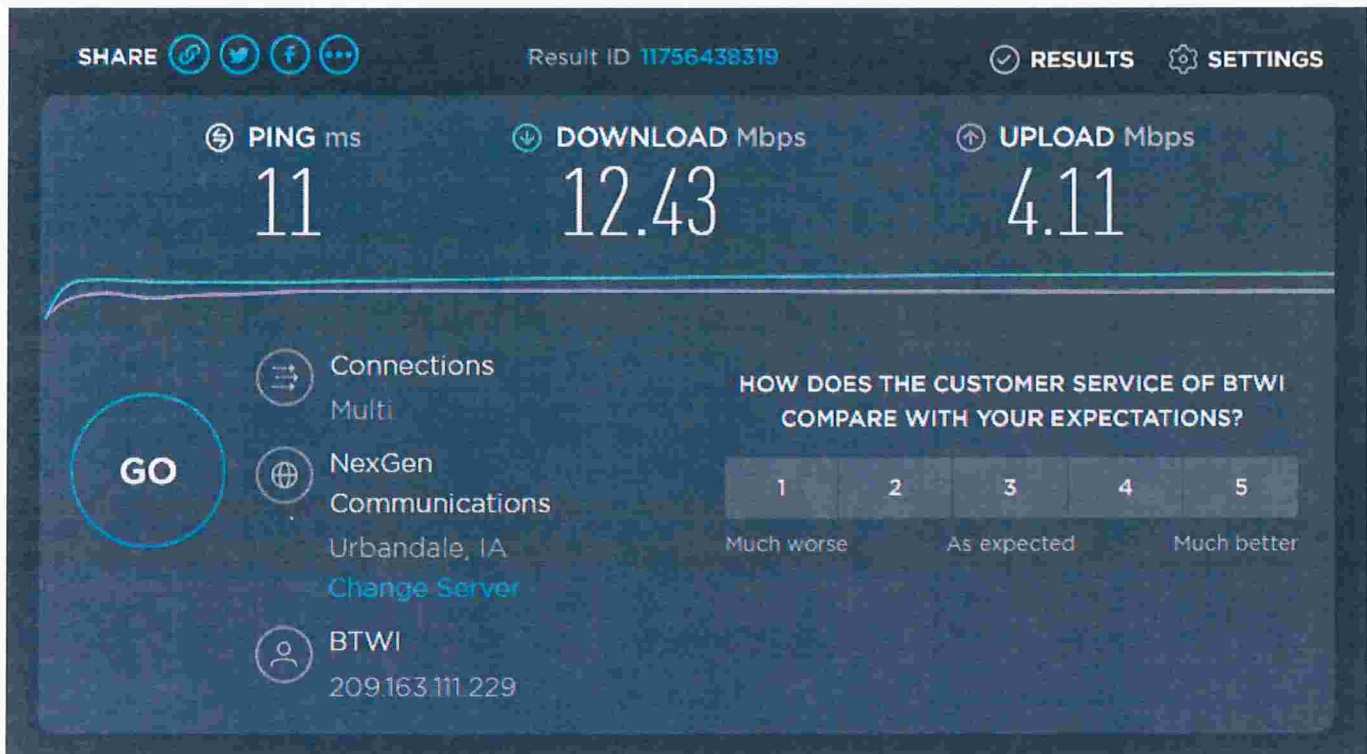
I certify that these results are from an actual speed test across BTWI's network taken from a subscriber's equipment who was subscribed to a 50Mbps plan.

Jeffeenhoff

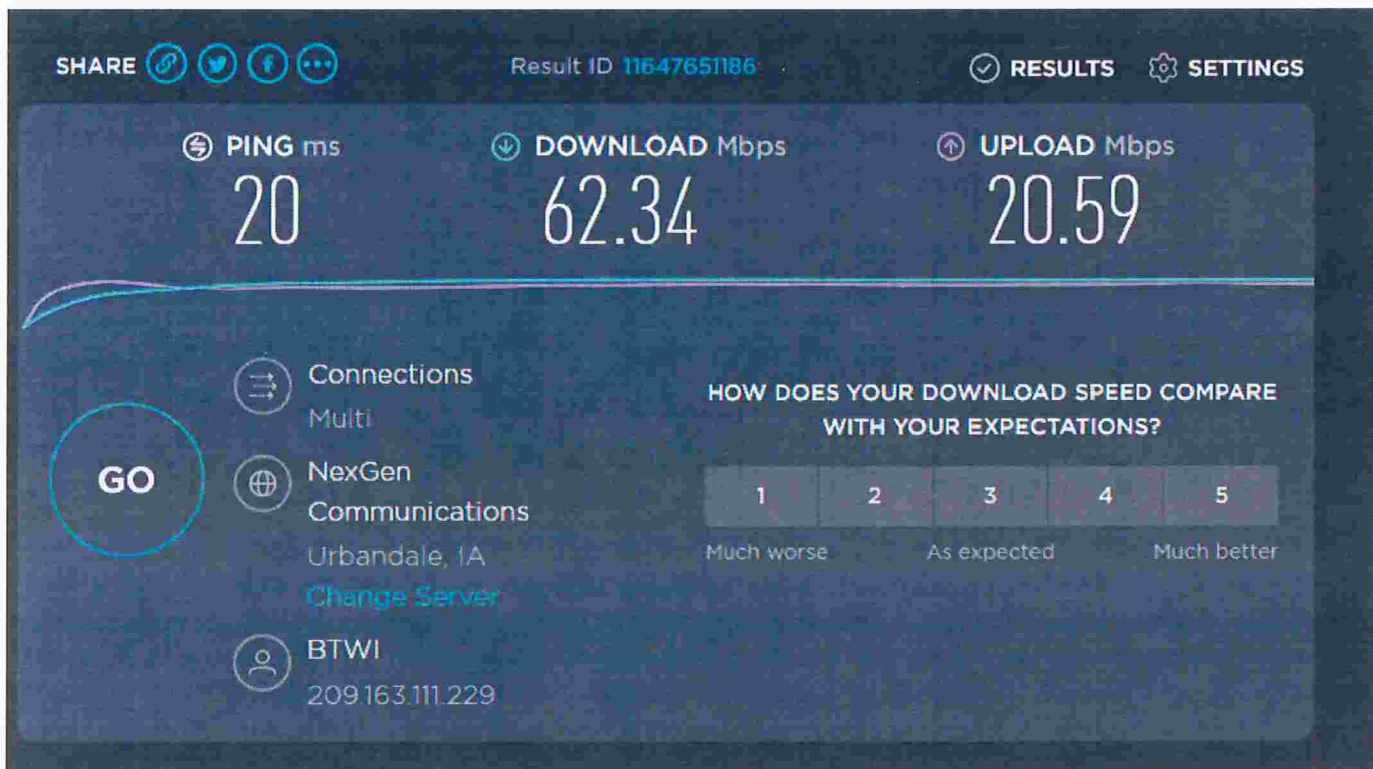


I certify that these results are from an actual speed test across BTWI's network taken from a subscriber's equipment who was subscribed to a 20Mbps plan.

Jeffeenhoff



I certify that these results are from an actual speed test across BTWI's network taken from a subscriber's equipment who was subscribed to a 10Mbps plan. *Jeff Henkoff*



I certify that these results are from an actual speed test across BTWI's network taken from a subscriber's equipment who was subscribed to a 50Mbps plan. *Jeff Henkoff*

City of Minburn

315 Baker St.
P.O. Box 213
Minburn, IA 50167

August 9, 2021

To Whom it May Concern,

Bits of Technology Wireless Internet (BTWI) contacted the City of Minburn early in 2016 with the offer to supply the city office with complementary internet. They are a fixed wireless company that had recently erected a tower just outside of Minburn. They were going to be supplying the library as well as a way to give back to a small community.

Minburn is a small city of 365 residents north and west of Des Moines. There are a handful of businesses, we lean on each other for support. The city was spending \$1300 a year on internet and phone. Any expenses we could trim meant more funds for roads, community events, cemetery expenses...things of that nature.

The City of Minburn has greatly appreciated the generosity of BTWI. Their locally owned family business values are what it means to be part of a small town. The City Clerk can complete reports, council information, email, and reply to customer inquiries easily. The Public Works Director can complete One Calls, respond to email inquiries and take online classes with fast, reliable internet.

BTWI is an asset to Minburn and rural areas around Minburn. Whether it was complimentary or not BTWI is the choice of our City Council and our employees. The customer service is top notch. Any time we have a question or a concern it is immediately addressed. We are not treated like our service is donated. We are treated with respect and just the same as a paying customer. The library has since moved to a different location and the donation of our services has not changed. The piece of mind having the extra funds provides makes an extreme difference in budgets as small as ours.

A handwritten signature in black ink, appearing to read "Janon Douglas", with a stylized, flowing script.

Janon Douglas

Acting City Clerk

July 28, 2021

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

Windstream Communications
Trent Fellers
trent.fellers@windstream.com

To whom it may concern:

This is a letter of inquiry concerning your firm's prior reporting to the State of Iowa Office of the Chief Information Officer ("OCIO" or "Office") regarding the availability of Broadband service in certain United States Census Block(s) within Iowa. Our Office received a formal notice of appeal challenging information reported on the Broadband Availability Map Version 4 ("V4") of the Statewide Broadband Availability Map ("Map"). The data reflected on V4 of the Map was either (1) provided by you to the Office's contractor ("Connected Nation") during the data collection window of April 15 through April 30, 2021, (2) gathered from other sources (such as FCC) that collected data from you, or (3) carried forward from prior reporting made to this Office by you under a previous Map version. Map V4 categorizes census blocks according to the facilitated speed offered within the block. The publication of V4 triggered a formal appeal window, as explained in more detail below, during which time we received this appeal. The appeal we received claims that the data reflected on V4 of the Map is inaccurate. This appeal can be found at <https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process> (see Docket Numbers 21-1011, 21-1013, 21-1014, 21-1017, 21-1018, 21-1019, 21-1021, 21-1031, 21-1032, 21-1033, 21-1034, 21-1037, 21-1038, 21-1044). **To resolve this matter, the Office requests that your firm provide information concerning your service in the affected Census Blocks as further identified and described below by August 11, 2021.**

On July 1, 2021, the Office officially published the final version of V4 of the Map, which identifies where Broadband service was offered or Facilitated at a tier 1, tier 2, or tier 3 speed as of July 1, 2021.¹ V4 of the Map is based primarily on data submitted to Connected Nation and/or FCC by Communication Service Providers concerning their service capabilities in the State of Iowa² and on informal comments/feedback supplied by interested parties as part of the informal comment/feedback process described above and in which your firm may have participated. V4 of the Map, and a detailed background of the same, can be found at: <https://ocio.iowa.gov/broadband-availability-map-version-4>. Overall, the new map reflects Targeted Service Areas

¹See Iowa Code §§ 8B.1(12), 8B.10. *See also* Iowa Admin. Code r. 129—20.1, 20.3, 20.4.

²See Iowa Admin. Code r. 129—20.3.

defined as a census block within which no communications service provider offers or facilitates broadband service at or above the tier 1, tier 2, or tier 3 download and upload speeds. The tier speeds are defined as follows:

“**Tier 1**” means a maximum download speed of less than 25 Mbps and a maximum upload speed of less than three Mbps.

“**Tier 2**” means a minimum download speed of greater than or equal to 25 Mbps but less than 50 Mbps. No minimum upload speed is applicable for Tier 2.

“**Tier 3**” means a minimum download speed of greater than or equal to 50 Mbps but less than 80 Mbps. No minimum upload speed is applicable for Tier 3.

“**Non-TSA**” means a census block in which speeds are facilitated at greater than or equal to 80 Mbps.

Through the official publication of V4 of the Map, the Office triggered the challenge process it is required by law to administer.³ Pursuant to applicable administrative rules, within 20 days after the Office’s official publication of V4 of the Map, “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” along with all evidence or information supporting their appeal. Iowa Admin. Code r. 129—20.5(1). Specifically, interested parties were permitted to provide the Office with evidence and information of the following: broadband is unavailable from a provider listed for the area (census block); or, that broadband speed is not as advertised.

V4 of the Map currently shows that service is Facilitated at either a tier 1, tier 2, or tier 3 speed per designated census block. As part of the above-outlined process, OCIO received a formal notice of appeal and supporting evidence or information from one or more Iowa residents or Communications Service Provider, claiming that Broadband service is not offered or Facilitated at that speed tier.

At this time, the Office requests your assistance in making an accurate determination as to whether your firm facilitates broadband service at the designated speed tier for 10% or more of the geographic area of each challenged census block as of July 1, 2021 to the Census Blocks identified in Exhibit A. To that end, the Office requests that you:

- 1) Complete and return the attached Affirmation of Service or Lack of Service in Census Blocks Broadband Grants Program Broadband Availability Map Challenge Process Form (see Exhibit A, Affirmation tab), by **August 11, 2021**. Pursuant to this form, OCIO requests that a representative with legal authority to bind your firm:
 - a) Confirm that your firm Facilitated Broadband service to the Census Blocks identified in Exhibit A as of July 1, 2021, and indicate the speeds at which your firm facilitated broadband service in those blocks. For purposes of this representation, “‘Facilitate’ means a communication service provider’s ability to provide broadband service at or above the download and upload speeds specified in the definition of targeted service area in this section to a home, farm, school, or business **within a commercially reasonable time and at a commercially reasonable price upon request by a consumer.**” Iowa Code § 8B.1(5) (emphasis added).
 - b) Fully complete all other aspects of the Form.
- 2) In addition to the form, please also submit any other evidence or information in your possession to the Office that supports your prior representations to the Office regarding the Census Blocks

³See Iowa Code § 8B.10(2); Iowa Admin. Code r. 129—20.5.

identified in Exhibit A. Examples of evidence and information the Office would consider particularly probative include “Bills or invoices provided to or received by customers in the applicable census block(s) which identify the specific download and upload speeds provided or received as of [July 1, 2021].” Iowa Admin. Code r. 129—20.5(8).

Please return the completed form and any supporting evidence or information to ociogrants@iowa.gov.

Please note that you are under no legal obligation to respond to this request for information. Generally, pursuant to applicable administrative rules, any affected person or party is free to submit evidence or information to the Office in support of or in opposition to an appeal within 20 days after the appeal has been posted to ocio.iowa.gov/broadband. Iowa Admin. Code r. 129—20.5(3). However, this Office is affirmatively reaching out to notify you of the appeal, of the circumstances surrounding the appeal, and to solicit your feedback and position. If this Office does not receive your response via Exhibit A of the Form by **August 11, 2021** (10 business days from the date of this letter), the Office will make a final decision based on the evidence and information currently available to it. Iowa Admin. Code r. 129—20.5(4), (5).

OCIO strives at all times to produce and disseminate accurate information. We appreciate your assistance in helping us achieve our statutory mandate.

Sincerely,

Office of the Chief Information Officer,
State of Iowa

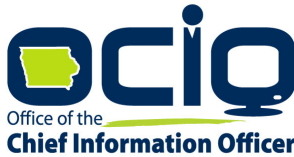


EXHIBIT A

**Affirmation of Service or Lack of Service in Census Blocks
Broadband Grants Program Broadband Availability Map Challenge Process**

A. RESPONDENT INFORMATION

Company Name	Windstream Corporation
Address	115 S. 2nd Ave W
City	Newton
State	Iowa
Zip	50208

B. DESIGNATED CONTACT INFORMATION

Contact Name	Logan Shine
Contact Phone Number	515-321-0194
Contact Email	logan.shine@windstream.com

C. AFFIRMATION

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

Company, consistent with the representations made in this form, and regardless of whether your company's prior reporting to the FCC or State of Iowa was correct or in error, meets one of the following criteria in each of the identified census blocks as of July 1, 2021:

1. Company Facilitated service at the indicated speeds on the Affirmation tab as of July 1, 2021 to more than 10% of the census block; or
2. Company did NOT offer or Facilitate material Broadband service.

Please indicate the speeds offered for each census block on the Affirmation tab.

D. ADDITIONAL EXPLANATION (To the extent you believe additional explanation is required to ensure that you are communicating full and accurate information, please use the below space to further explain, qualify, or substantiate your above affirmation. To the extent necessary, please feel free to upload additional explanations/supporting documentation.

E. SIGNATURE* By typing your full name you are affixing your signature to this form and attesting to the accuracy of the information submitted herein.

Authorized Signature:	Logan Shine
Title:	Vice President Government Affairs
Date:	8/16/2021

*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 Iowa Code section 622.1 and pursuant to the laws of the state of Iowa, 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 Iowa 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 V4 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 Iowa 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 out.

CENSUS BLOCK ID	Do you Facilitate service to more than 10% of the geographic area of the Census Block?	Download Speed	Upload Speed
190230705002066	Yes	25	3
190490505002023	Yes	109.056	9.6
190490505002079	Yes	183.501	51.773
190490505002080	No	0	0
190490505002081	Yes	109.056	9.6
190490505002082	Yes	109.056	9.6
190490505002083	No	0	0
190490505002084	No	0	0
190490505002085	Yes	200	51.773
190490505002088	Yes	200	51.773
190490505002089	Yes	109.056	9.6
190490505002090	Yes	183.501	51.773
190490505002091	Yes	109.056	9.6
190490505002093	Yes	183.501	51.773
190490505002094	Yes	183.501	51.773
190490505002095	Yes	183.501	51.773
190490505002096	Yes	183.501	51.773
190490505002097	Yes	208.667	51.773
190490505002098	No	0	0
190490505002099	Yes	208.667	51.773
190490505002123	Yes	183.501	51.773
190490505002124	Yes	183.501	51.773
190490505002129	Yes	183.501	51.773
190490505002130	Yes	208.667	51.773
190779501001032	Yes	183.501	51.773
190779501001033	Yes	85.721	17.039
190779501001034	Yes	208.667	51.773
190779501001037	Yes	208.667	51.773
190779501001038	No	0	0
190779501001039	Yes	183.501	51.773
190779501001040	Yes	208.667	51.773
190779501001041	Yes	208.667	51.773
190779501001042	Yes	208.667	51.773
190779501001043	Yes	183.501	51.773
190779501001044	Yes	183.501	51.773
190779501001045	Yes	183.501	51.773
190779501001046	Yes	200	51.773
190779501001047	Yes	85.721	17.039
190779501001048	Yes	200	50
190779501001049	Yes	200	51.773
190779501001050	Yes	183.501	51.773
190779501001051	Yes	183.501	51.773

190779501001052	Yes	183.501	51.773
190779501001053	Yes	183.501	51.773
190779501001054	Yes	183.501	51.773
190779501001055	Yes	111.28	73.728
190779501001056	Yes	90	15
190779501001058	Yes	111.28	31.982
190779501001059	Yes	123.208	51.773
190779501001061	No	47.317	2.621
190779501001094	Yes	150	50
190779501001095	Yes	183.501	51.773
190779501001096	Yes	183.501	51.773
190779501001097	Yes	183.501	51.773
190779501001098	Yes	183.501	51.773
190779501001099	Yes	183.501	51.773
190779501001100	Yes	150	51.773
190779501001104	Yes	200	51.773
190779501001105	Yes	208.667	51.773
190779501001106	Yes	183.501	51.773
190779501001107	Yes	183.501	51.773
190779501001108	Yes	208.667	51.773
190779501001109	No	0	0
190779501001110	Yes	208.667	51.773
190779501001111	Yes	200	51.773
190779501001112	Yes	183.501	51.773
190779501001116	No	0	0
190779501001117	Yes	183.501	51.773
190779501001118	Yes	183.501	51.773
190779501001119	Yes	183.501	51.773
190779501001120	Yes	208.667	51.773
190779501001121	Yes	183.501	51.773
190779501001122	Yes	183.501	51.773
190779501001138	Yes	183.501	51.773
190779501001139	Yes	208.667	51.773
190779501001140	Yes	200	51.773
190779501001142	Yes	150	50
190779501001143	Yes	208.667	51.773
190779501001312	Yes	183.501	51.773
190779501001313	Yes	123.208	51.773
190779501001314	Yes	123.208	51.773
190779501001315	Yes	123.208	51.773
190779501001316	Yes	123.208	51.773
190779501001317	Yes	90	15
190779501001318	Yes	85.721	17.039
190779501001319	Yes	85.721	17.039
190779501001320	Yes	150	50

190779501001321	Yes	96.076	23.069
190779501001322	Yes	100	30
190779501001323	Yes	90	15
190779501001324	Yes	73.007	11.928
190779501001325	Yes	73.007	11.928
190779501001326	No	47.317	2.621
190779501001327	Yes	73.007	11.928
190779502001004	Yes	73.007	11.928
190779502001043	Yes	85.721	17.039
190779502001044	Yes	85.721	17.039
190779502001045	Yes	85.721	17.039
190779502001046	Yes	85.721	17.039
190779502001048	No	47.317	2.621
190779502001049	Yes	183.501	51.773
190779502001050	Yes	183.501	51.773
190779502001051	Yes	183.501	51.773
190779502001052	Yes	183.501	51.773
190779502001053	Yes	111.28	31.982
190779502001054	No	0	0
190779502001055	Yes	111.28	31.982
190779502001058	Yes	123.208	51.773
190779502001060	Yes	111.28	31.982
190779502001062	Yes	123.208	51.773
190779502001064	Yes	150	51.773
190779502001065	Yes	183.501	51.773
190779502001066	Yes	183.501	51.773
190779502001067	Yes	183.501	51.773
190779502001068	Yes	208.667	51.773
190779502001069	Yes	183.501	51.773
190779502001070	Yes	183.501	73.728
190779502001071	No	47.317	2.621
190779502001072	Yes	183.501	51.773
190779502001073	Yes	183.501	51.773
190779502001074	Yes	183.501	51.773
190779502001075	Yes	208.667	51.773
190779502001076	Yes	208.667	51.773
190779502001077	Yes	183.501	51.773
190779502001078	Yes	183.501	51.773
190779502001079	Yes	183.501	51.773
190779502001080	Yes	183.501	51.773
190779502001082	Yes	183.501	51.773
190779502001083	Yes	183.501	51.773
190779502001084	Yes	208.667	51.773
190779502001085	Yes	208.667	51.773
190779502001086	Yes	183.501	51.773

190779502001087	Yes	183.501	51.773
190779502001088	Yes	183.501	51.773
190779502001089	Yes	183.501	51.773
190779502001092	Yes	183.501	51.773
190779502001095	Yes	111.28	31.982
190779502001097	Yes	85.721	17.039
190779502001099	Yes	123.208	51.773
190779502001100	Yes	111.28	31.982
190779502001101	Yes	123.208	51.773
190779502001102	Yes	111.28	31.982
190779502001103	Yes	183.501	51.773
190779502001104	Yes	183.501	51.773
190779502001105	Yes	183.501	51.773
190779502001106	Yes	183.501	51.773
190779502001127	Yes	73.007	11.928
190779502001297	Yes	183.501	51.773
190779502001298	Yes	96.076	23.069
190779502001299	Yes	96.076	23.069
191070801001006	Yes	111.28	31.982
191070801001007	No	0	0
191070801001009	Yes	1000	1000
191070801001010	Yes	85.721	17.039
191070801001011	Yes	111.28	31.982
191070801001012	Yes	123.208	51.773
191070801001013	Yes	1000	1000
191070801001014	Yes	1000	1000
191070801001015	Yes	1000	1000
191070801001016	Yes	1000	1000
191070801001017	Yes	1000	1000
191070801001018	Yes	1000	1000
191070801001019	Yes	1000	1000
191070801001020	Yes	1000	1000
191070801001021	Yes	1000	1000
191070801001022	Yes	1000	1000
191070801001023	Yes	1000	1000
191070801001024	Yes	1000	1000
191070801001025	Yes	1000	1000
191070801001026	Yes	1000	1000
191070801001027	Yes	1000	1000
191070801001028	Yes	123.208	51.773
191070801001029	Yes	200	51.773
191070801001030	Yes	123.208	51.773
191070801001031	Yes	200	51.773
191070801001032	Yes	111.28	31.982
191070801001033	Yes	111.28	31.982

191070801001034	Yes	111.28	31.982
191070801001035	Yes	111.28	31.982
191070801001036	Yes	111.28	31.982
191070801001037	Yes	123.208	51.773
191070801001038	Yes	150	50
191070801001039	Yes	150	51.773
191070801001040	Yes	183.501	51.773
191070801001041	Yes	183.501	51.773
191070801001042	Yes	183.501	51.773
191070801001043	Yes	150	51.773
191070801001044	Yes	1000	1000
191070801001045	Yes	183.501	51.773
191070801001046	Yes	200	51.773
191070801001047	Yes	183.501	51.773
191070801001048	Yes	183.501	51.773
191070801001049	Yes	123.208	51.773
191070801001050	Yes	200	51.773
191070801001051	Yes	123.208	51.773
191070801001052	Yes	111.28	31.982
191070801001053	Yes	150	51.773
191070801001054	Yes	96.076	23.069
191070801001055	Yes	111.28	31.982
191070801001056	Yes	123.208	51.773
191070801001057	Yes	96.076	23.069
191070801001058	Yes	111.28	31.982
191070801001059	Yes	150	50
191070801001060	Yes	96.076	23.069
191070801001061	Yes	183.501	51.773
191070801001062	Yes	123.208	51.773
191070801001063	Yes	111.28	31.982
191070801001064	Yes	123.208	51.773
191070801002079	No	4.8	1.024
191070801002101	No	12.032	2.048
191070801002107	Yes	1000	1000
191839602003035	Yes	96.076	23.069
191839602003036	Yes	96.076	23.069
191839602003039	Yes	96.076	23.069
191659602001117	Yes	123.208	51.773
191550215012069	Yes	111.28	31.982
190090703001057	Yes	111.28	31.982
190019602002027	Yes	109.056	9.6
190019602002028	Yes	109.056	9.6
190019602002029	Yes	109.056	9.6
190019602002030	Yes	109.056	9.6
190019602002032	Yes	109.056	9.6

190019602002054	No	4.8	1.024
190019602002075	Yes	111.28	31.982
190019602002083	Yes	73.007	11.928
190019603004000	Yes	109.056	9.6
190019603004003	Yes	109.056	9.6
190019603004004	Yes	109.056	9.6
190019603004005	Yes	109.056	36.864
190019603004007	Yes	96.076	23.069
190019603004014	No	0	0
190019603004016	Yes	109.056	9.6
190019603004017	Yes	81.792	9.6
190019603004019	Yes	200	51.773
190019603004053	Yes	96.076	23.069
190019603004073	No	47.317	2.621
190019603004074	No	31.195	1.966
190019603004080	No	81.792	9.6
190019603004089	Yes	183.501	51.773
190019603004110	Yes	81.792	9.6
190119606002006	Yes	25	3
190119606002007	Yes	25	3
190119606002008	Yes	25	3
190119606002009	Yes	36.864	3
190119606002012	Yes	109.056	9.6
190119606002013	Yes	75	5
190119606002015	Yes	109.056	36.864
190119606002016	Yes	25	3
190119606002017	Yes	109.056	9.6
190119606002018	Yes	54.528	36.864
190119606002032	Yes	109.056	36.864
190119606002083	Yes	150	50
190119606002084	Yes	123.208	51.773
190119606002085	No	0	0
190119606002087	No	85.721	36.864
190119606003105	Yes	25	3
190119606003106	No	0	0
190119606003110	Yes	96.076	17.039
190119606003112	Yes	81.792	9.6
190119606003114	Yes	109.056	9.6
190119606003115	Yes	109.056	36.864
190119606003117	Yes	109.056	9.6
190119606003118	Yes	81.792	36.864
190119606003120	Yes	25	3
190119607001000	Yes	81.792	36.864
190119607001001	Yes	109.056	9.6
190119607001002	Yes	109.056	9.6

190119607001003	Yes	109.056	9.6
190119607002000	Yes	109.056	36.864
190119607002001	Yes	109.056	9.6
190119607002002	Yes	109.056	9.6
190119607002006	No	27.394	2.097
190119607002007	Yes	25	3
190119607002009	Yes	25	3
190959601003028	No	0	0
190959601003029	Yes	109.056	9.6
190959601003058	Yes	109.056	9.6
190959601003060	Yes	25	3
190959602001084	Yes	109.056	9.6
190959602001086	Yes	36.864	3
190959602001087	Yes	109.056	9.6
190959602001089	Yes	109.056	9.6
190959602001095	Yes	109.056	36.864
190959602001097	Yes	109.056	36.864
190959602001098	Yes	100	20
190959602001099	Yes	25	3
190959602002000	Yes	25	3
190959602002001	Yes	109.056	9.6
190959602002002	Yes	109.056	9.6
190959602002003	Yes	25	3
190959602002004	Yes	25	3
190959602002005	Yes	109.056	36.864
190959602002006	No	0	0
190959602002007	Yes	109.056	9.6
190959602002014	Yes	109.056	9.6
190959602002015	Yes	50	5
190959602002016	Yes	109.056	9.6
190959602002017	Yes	109.056	9.6
190959602002018	No	28.8	2.048
190959602002019	Yes	109.056	9.6
190959602002020	Yes	25	3
190959602002021	Yes	109.056	9.6
190959602002022	Yes	109.056	9.6
190959602002023	Yes	109.056	36.864
190959602002026	Yes	109.056	9.6
190959602002027	Yes	50	5
190959602002028	Yes	109.056	36.864
190959602002029	Yes	75	5
190959602002030	Yes	109.056	9.6
190959602002032	Yes	109.056	9.6
190959602002036	Yes	25	3
190959602002037	Yes	25	3

190959602002038	Yes	109.056	9.6
190959602002039	Yes	109.056	9.6
190959602002070	Yes	25	3
190959602002103	Yes	25	3
190959602002104	Yes	109.056	9.6
190959602003000	No	4.8	1.024
190959602003001	Yes	25	3
190959602003026	Yes	25	3
190959602003028	Yes	25	3
190959602004012	No	109.056	9.6
190959602004017	Yes	25	3
190959602004018	Yes	25	3
190959602004019	No	4.8	1.024
190959602004020	Yes	25	3
190959602004021	Yes	81.792	9.6
190959602004024	Yes	109.056	9.6
190959602004025	Yes	109.056	9.6
190959602004142	Yes	109.056	9.6
190959602004142	Yes	109.056	9.6
190959602004143	Yes	25	3
190959602004145	Yes	109.056	9.6
190959602004147	Yes	54.528	4.8
190959602004148	Yes	81.792	9.6
190959602004154	Yes	25	3
190959602004160	Yes	25	3
191573701002058	Yes	54.528	4.8
191573701002059	Yes	36.864	3
191573701002076	Yes	25	3
191712906003001	Yes	150	50
191712906003002	Yes	85.721	17.039
191712906003011	Yes	183.501	51.773
191712906003013	Yes	111.28	31.982
191712906003018	Yes	25	3
191712906003020	Yes	36.864	3
191712906003021	Yes	85.721	17.039
191712906003031	Yes	81.792	36.864
191712906003071	Yes	50	5
191712906003072	Yes	81.792	36.864
191712906003082	Yes	54.528	4.8
191712906003085	Yes	109.056	9.6
191712906003086	Yes	25	3
191712906003088	Yes	25	3
191712906003089	No	3.584	0.768
191712906003090	Yes	109.056	9.6
191712906004080	Yes	36.864	3

191712906004081	Yes	36.864	3
191130102001014	Yes	96.076	23.069
191130102001015	Yes	96.076	23.069
191130102001016	Yes	111.28	31.982
191130102001017	Yes	111.28	31.982
191130102001018	Yes	183.501	51.773
191130102001019	Yes	85.721	17.039
191130102001020	Yes	111.28	31.982
191130102001021	Yes	208.667	51.773
191130102001022	Yes	208.667	51.773
191130102001023	Yes	183.501	51.773
191130102001024	Yes	200	51.773
191130102001025	Yes	150	51.773
191130102001026	Yes	111.28	31.982
191130102001027	Yes	150	51.773
191130102001029	Yes	96.076	23.069
191130102001030	Yes	183.501	51.773
191130102001031	Yes	183.501	51.773
191130102001032	Yes	183.501	51.773
191130102001033	Yes	208.667	51.773
191130102001034	Yes	150	51.773
191130102001035	Yes	200	51.773
191130102001036	Yes	208.667	51.773
191130102001038	Yes	200	51.773
191130102001040	Yes	200	51.773
191130102001084	Yes	96.076	23.069
191130102001001	Yes	85.721	17.039
191130102001006	Yes	73.007	11.928
191130102001008	No	96.076	23.069
191130102001012	Yes	96.076	23.069
191130102001037	Yes	96.076	23.069
191130102001041	Yes	73.007	11.928
191130102001045	No	31.195	1.966
191130102001046	Yes	96.076	23.069
191130102001050	Yes	60	10
191130102001051	No	47.317	2.048
191130102001071	No	40	2
191130102001072	Yes	183.501	51.773
191130102001073	Yes	111.28	31.982
191130102001074	Yes	123.208	51.773
191130102001075	Yes	150	51.773
190199506002017	Yes	54.528	4.8
190199506002056	Yes	109.056	9.6
190199506002060	Yes	109.056	9.6
190199506002094	Yes	109.056	9.6

190199506002095	No	28.8	2.048
190199506002106	Yes	109.056	9.6
190199506002110	Yes	109.056	9.6
190150206001212	Yes	81.792	9.6
190150206001215	Yes	25	3
190150206001250	Yes	25	3
190150206001255	Yes	25	3
190150206001256	Yes	54.528	4.8
190150206001257	Yes	25	3
190150206001259	Yes	25	3
190150206001283	Yes	25	3
190490502002039	No	31.195	2.048
190490505001073	Yes	25	3
190490505001104	Yes	25	3
190490505001112	Yes	25	3
190490505001113	Yes	25	3
190490505001114	Yes	25	3
190490505001116	Yes	25	3
190490505001120	Yes	25	3
190490505001121	Yes	25	3
190490505001122	Yes	25	3
190490505001127	Yes	25	3
190490505001128	Yes	25	3
190490505001129	Yes	25	3
190490505001130	No	0	0
190490505001134	Yes	25	3
190490505001135	Yes	25	3
190490505001145	Yes	109.056	9.6
190490505001146	Yes	100	20
190490505001147	Yes	100	20
190490505001148	Yes	109.056	9.6
190490505001149	No	0	0
190490505001168	Yes	109.056	9.6
190490505001169	Yes	109.056	9.6
190730801001117	Yes	25	3
190730801001119	Yes	81.792	9.6
190730801001120	Yes	25	3
190730801001153	Yes	54.528	4.8
190730801001161	Yes	25	3
190490505001171	Yes	25	3
190490505001176	Yes	25	3
190490505001177	Yes	25	3
190490505001178	Yes	25	3
190490505001179	Yes	25	3
190490505001182	Yes	25	3

190490505002004	Yes	25	3
190490505002005	Yes	25	3
190490505002006	Yes	25	3
190490505002007	Yes	25	3
190490505002008	Yes	25	3
190490505002048	Yes	81.792	9.6
190490505002049	Yes	25	3
190490505002051	Yes	25	3
190490505002052	Yes	25	3
190490505002053	Yes	25	3
190490505002058	Yes	25	3
190490505002060	Yes	25	3
190490505002061	Yes	25	3
190490505002062	Yes	25	3
190490505002064	Yes	25	3
190490505002065	Yes	25	3
190490505002070	Yes	25	3
190490505002071	Yes	25	3
190490505002072	Yes	109.056	9.6
190490505002074	Yes	25	3
190490505002076	Yes	109.056	9.6
190490505002077	Yes	25	3
190490505002122	Yes	25	3
190490507001003	Yes	25	3
191839605001139	Yes	123.208	51.773
191839605001144	Yes	183.501	51.773
191839605001145	Yes	150	51.773
191839605001146	Yes	111.28	31.982
191839605001147	Yes	96.076	23.069
191839605001148	Yes	111.28	31.982
191839605001149	Yes	111.28	31.982
191839605001150	Yes	183.501	51.773
191839605001151	Yes	183.501	51.773
191839605001152	Yes	123.208	51.773
191839605001153	No	0	0
191839605001157	Yes	208.667	51.773
191839605001158	Yes	183.501	51.773
191839605001159	Yes	183.501	51.773
191839605001160	Yes	183.501	51.773
191839605001161	Yes	96.076	23.069
191839605001163	Yes	200	51.773
191839605001164	Yes	183.501	51.773
191839605001165	Yes	183.501	51.773
191839605001166	Yes	183.501	51.773
191839605001168	No	0	0

191839605001169	Yes	183.501	51.773
191839605001170	Yes	183.501	51.773
191839605001174	Yes	183.501	51.773
191839605001180	Yes	111.28	31.982
191839605001181	Yes	111.28	31.982
191839605001182	Yes	123.208	51.773
191839605002017	Yes	183.501	51.773
191839605002018	Yes	183.501	128
191839605002023	Yes	85.721	17.039
191839605002024	Yes	85.721	17.039
191839605002029	Yes	183.501	51.773

Windstream Response

[illegible]

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Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
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