#### FINAL AGENCY DECISION

### STATEWIDE BROADBAND AVAILABILITY MAP VERSION 4 APPEAL September 14, 2021

DOCKET NO. 21-2014				
	A. APPELANT INFORMATION			
Company Name	Cloudburst 9, LLC			
Address	510 B Ave			
City	Kalona			
State	Iowa			
Zip	52247			
	B. DESIGNATED CONTACT INFORMATION			
Contact Name	Casey Peck			
Contact Phone Number	319-365-3668			
Contact Email	casey.peck@kctc.net			
	C. APPEAL TYPE			
	Resident Challenge			
	First-Party Provider Challenge			
<b>✓</b>	Third-Party Provider Challenge			
	D. EVIDENCE CONSIDERED			
Appellant related thereto (se	Blocks forming the basis of this Appeal, the Office has reviewed the evidence and information submitted by ee Appendix B for original submission), in conjunction with the maps and data sources originally utilized in ation of these Census Blocks, and made a determination as to the Census Block TSA Tier designations as set			
$\checkmark$	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			
$\checkmark$	If checked, Appellant submitted additional information in support of its Appeal. This information has been considered by the Office in making its Final Decision.			
$\checkmark$	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 whethe reported broadband service was Facilitated in one or more blocks of this Appeal as reflected on Map V4 as 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.				
	broadband-availability-map-version-4-challenge-process for more information regarding how the Office 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. lowa 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	Targeted Service Area (TSA) is a census block within which no communications service provider offers or facilitates broadband service at or above the tier ., tier 2, or tier 3 download and upload speeds, as applicable.						
Tier 1	A maximum download speed	of less than 25 megabits per seco	nd (Mbps) and a max	imum upload spe	ed of less than 3 Mbps.		
Tier 2	A minimum download speed o	of greater than or equal to 25 Mbp	s but less than 50 M	lbps. No minimum	upload speed is applicable for Tier	2.	
Tier 3	A minimum download speed o	of greater than or equal to 50 Mbp	s but less than 80 M	lbps. No minimum	upload speed is applicable for Tier	3.	
Non-TSA	A non-TSA is a census block in	n which speeds are Facilitated at g	reater 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	l .	flected in this column correspond the website at https://ocio.iowa.g	_	-	Office made its decision regarding n-4-challenge-process.	the Block. The	
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	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:						
Reporting	In Error: Data was reported incorrectly to FCC or Connected Nation	Correct: Data was reported correctly to FCC or Connected Nation	No Response: Data to FCC or Connected	•	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
21-1014	191070801002079	unknown	Non-TSA	Tier 3	Tier 3	1	
21-1014	191070801002101	unknown	Non-TSA	Tier 3	Tier 3	1	
21-1014	191070801002107	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001052	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191839602003039	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191839602003036	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191839602003035	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001057	unknown	Non-TSA	Tier 3	Non-TSA	3	

21-1014	191070801001056	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001055	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001054	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001063	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001053	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001062	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001061	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001064	unknown	Non-TSA	Tier 3	Non-TSA	3	21-069
21-1014	191070801001058	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001060	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001059	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001049	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001048	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001047	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001046	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001045	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001041	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001050	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001037	unknown	Non-TSA	Tier 3	Non-TSA	3	21-022
21-1014	191070801001051	unknown	Non-TSA	Tier 3	Non-TSA	3	21-066
21-1014	191070801001042	unknown	Non-TSA	Tier 3	Non-TSA	3	21-053
21-1014	191070801001044	unknown	Non-TSA	Tier 3	Non-TSA	3	21-068
21-1014	191070801001027	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001028	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001043	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001029	unknown	Non-TSA	Tier 3	Non-TSA	3	21-100
21-1014	191070801001040	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001039	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001038	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001036	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001018	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001021	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001017	unknown	Non-TSA	Tier 3	Non-TSA	3	
	•				•		

21-1014	191070801001022	unknown	Non-TSA	Tier 3	Non-TSA	3	21-061
21-1014	191070801001023	unknown	Non-TSA	Tier 3	Non-TSA	3	21-023
21-1014	191070801001024	unknown	Non-TSA	Tier 3	Non-TSA	3	21-062
21-1014	191070801001025	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001026	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001014	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001015	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001016	unknown	Non-TSA	Tier 3	Non-TSA	3	21-101
21-1014	191070801001013	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001012	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001030	unknown	Non-TSA	Tier 3	Non-TSA	3	21-059, 21-065
21-1014	191070801001031	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001032	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001033	Unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001035	Unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001034	Unknown	Non-TSA	Tier 3	Non-TSA	3	21-067
21-1014	191070801001006	unknown	Non-TSA	Tier 3	Non-TSA	3	21-092
21-1014	191070801001007	unknown	Non-TSA	Tier 3	Tier 3	1	
21-1014	191070801001011	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001010	unknown	Non-TSA	Tier 3	Non-TSA	3	
21-1014	191070801001008	unknown	Non-TSA	Tier 3	Tier 3	1	
21-1014	191070801001004	unknown	Non-TSA	Tier 3	Tier 3	1	
21-1014	191070801001009	unknown	Non-TSA	Tier 3	Non-TSA	3	21-026, 21-063
21-1014	191070801001019	unknown	Non-TSA	Tier 3	Non-TSA	3	21-072
21-1014	191070801001020	unknown	Non-TSA	Tier 3	Non-TSA	3	

## APPENDIX B CERTIFICATION AND SUPPORTING INFORMATION



Grants, OCIO <ociogrants@iowa.gov>

#### **Keota Challenge Process**

1 message

Casey Peck <casey.peck@kctc.net>

Fri, Jul 16, 2021 at 3:57 PM

To: "Grants, OCIO" <ociogrants@iowa.gov>, "Turba, Jessica" <jessica.turba2@iowa.gov>

Cc: Cloudburst 9 Group <cb9@kctc.net>

This challenge includes those non-TSA census blocks from the towns of Keota, Iowa. We appreciate your consideration in this manner.

Please feel free to reach out to me with any additional questions.

#### **Casey Peck**

Cloudburst 9, LLC

**Managing Member** 



#### Kalona Cooperative Technology Company

Providing world class technology services ~with a home town touch

Website: www.KCTC.net • Voice: 1-(319)-656-3668 510 B Ave • PO Box 1208 • Kalona, IA 52247-1208 Find Us Online! Facebook • Twitter • YouTube

Did you enjoy your experience with us? Leave us a review!

The email is for the intended recipient only. The email may contain private information. If the email is received in error, the sender must be notified and any copies of the email destroyed. Any unauthorized review, use, or disclosure of the contents is prohibited.

#### 2 attachments



City of Keota Letter of Support.pdf



Cloudburst 9 map\_v4\_provider\_challenge\_form Keota IA.xlsx 175K



	A. APPELANT INFORMATION			
Company Name Address City State	Cloudburst 9, LLC 510 B Ave Kalona Iowa			
Zip B.	52247 DESIGNATED CONTACT INFORMATION			
Contact Name Contact Phone Number Contact Email C. CE	Casey Peck 319-365-3668 casey.peck@kctc.net RTIFICATION/ATTESTATION/AFFIRMATION ed company, and its duly authorized representative signing on behalf thereof, hereby affirms,			
	represented in its submission: Choose one option that describes company/affiliation status.			
Company, consistent with the representations made in this form, and regardless of whether your company's prior reporting to to the FCC or State of lowa was correct or in error as of July 1, 2021, 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.				
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.				
accurate information, please use the below space to	you believe additional explanation is required to ensure that you are communicating full and further explain, qualify, or substantiate your above certification/attestation/affirmation. To the el free to upload additional explanations/supporting documentation.			
We believe the information received from numerous community consumers indicates they are unable to receive the speeds the map indicates as being provided by either Windstream or Mediacom. Please see the attached for supporting documentation along with separate resident challenges for these specific addresses/blocks.				
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:	Casey Peck			
Title: Date:	Managing Member Cloudburst 9, LLC			
Date.	Oloudbulgt v, ELO			

\*PLEASE READ BEFORE SIGNING: By signing and submitting this form, I, on my own behalf or as a representative of the company identified above, as applicable, expressly represent that I am authorized to make the above factual representation on behalf of said company and/or myself, as applicable, and under penalty of perjury as authorized by lowa Code section 622.1 and pursuant to the laws of the state of lowa, certify the following with respect to this form submitted on behalf of said company and/or myself: any statements, representations, or attestations made in this form, including any attachments or enclosures associated therewith, are true and accurate; I, on behalf of said company and/or myself, have not knowingly made any false statements or representations in this form. In addition to any criminal penalties authorized by lowa Code section 720.2 that may result from any false statements of material fact made herein or any other remedies available at law, equity, or otherwise, if it is subsequently determined that I have made a statement, representation, warranty, certification, or attestation in this form, or any attachments or enclosures associated herewith, that is later proven untrue in any material respect, the company on which I submitted this form on behalf of may be disqualified from current incentive programs administered by the Office or may be ordered to repay the Office the entire amount of any funds previously distributed by the Office to said company in connection with any current incentive programs administered by the Office. OCIO makes no guarantees as to whether the information supplied by you will result in any change to the Broadband Availability Map 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 r

Please familiarize yourself with t	he 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 or equal to 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 more than 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	Connected Nation Definitions 1. In Error means data was reported incorrectly to FCC or Connected Nation. 2. Correct means data was reported coreectly to FCC or Connected Nation. 3. No Response means data was not reported to FCC or Connected Nation. 4. Unknown means data is incorrect for unknown	Speed Tier that is reflected on Map v.4	What do you believe the Map should reflect for Facilitated service as of July1, 2021?
191070801002079		Non-TSA	Tier 3
191070801002101	unknown	Non-TSA	Tier 3
191070801002107	<u>unknown</u>	Non-TSA	Tier 3
191070801001052	<u>unknown</u>	Non-TSA	Tier 3
191839602003039	<u>unknown</u>	Non-TSA	Tier 3
191839602003036	<u>unknown</u>	Non-TSA	Tier 3
191839602003035	unknown	Non-TSA	Tier 3
191070801001057	unknown	Non-TSA	Tier 3
191070801001056	unknown	Non-TSA	Tier 3
191070801001055	unknown	Non-TSA	Tier 3
191070801001054	unknown	Non-TSA	Tier 3
191070801001063	unknown	Non-TSA	Tier 3
191070801001053	unknown	Non-TSA	Tier 3
191070801001062	unknown	Non-TSA	Tier 3
191070801001061	unknown	Non-TSA	Tier 3
191070801001064	unknown	Non-TSA	Tier 3
191070801001058	unknown	Non-TSA	Tier 3
191070801001060		Non-TSA	Tier 3
191070801001059		Non-TSA	Tier 3
191070801001049	unknown	Non-TSA	Tier 3
191070801001048	unknown	Non-TSA	Tier 3
191070801001047		Non-TSA	Tier 3
191070801001046	unknown	Non-TSA	Tier 3

191070801001045	unknown	Non-TSA	Tier 3
191070801001041	unknown	Non-TSA	Tier 3
191070801001050	unknown	Non-TSA	Tier 3
191070801001037	unknown	Non-TSA	Tier 3
191070801001051	unknown	Non-TSA	Tier 3
191070801001042	unknown	Non-TSA	Tier 3
191070801001044	unknown	Non-TSA	Tier 3
191070801001027	unknown	Non-TSA	Tier 3
191070801001028	unknown	Non-TSA	Tier 3
191070801001043	unknown	Non-TSA	Tier 3
191070801001029	unknown	Non-TSA	Tier 3
191070801001040	unknown	Non-TSA	Tier 3
191070801001039	unknown	Non-TSA	Tier 3
191070801001038	unknown	Non-TSA	Tier 3
191070801001036	unknown	Non-TSA	Tier 3
191070801001018	unknown	Non-TSA	Tier 3
191070801001021	unknown	Non-TSA	Tier 3
191070801001017	unknown	Non-TSA	Tier 3
191070801001022	unknown	Non-TSA	Tier 3
191070801001023	unknown	Non-TSA	Tier 3
191070801001024	unknown	Non-TSA	Tier 3
191070801001025	unknown	Non-TSA	Tier 3
191070801001026	unknown	Non-TSA	Tier 3
191070801001014	unknown	Non-TSA	Tier 3
191070801001015	unknown	Non-TSA	Tier 3
191070801001016	unknown	Non-TSA	Tier 3
191070801001013	unknown	Non-TSA	Tier 3
191070801001012	unknown	Non-TSA	Tier 3
191070801001030	unknown	Non-TSA	Tier 3
191070801001031	unknown	Non-TSA	Tier 3
191070801001032	unknown	Non-TSA	Tier 3
191070801001033	Unknown	Non-TSA	Tier 3
191070801001035	Unknown	Non-TSA	Tier 3
191070801001034	Unknown	Non-TSA	Tier 3
191070801001006	unknown	Non-TSA	Tier 3
191070801001007	unknown	Non-TSA	Tier 3

191070801001011	unknown	Non-TSA	Tier 3
191070801001010	unknown	Non-TSA	Tier 3
191070801001008	unknown	Non-TSA	Tier 3
191070801001004	unknown	Non-TSA	Tier 3
191070801001009	unknown	Non-TSA	Tier 3
191070801001019	unknown	Non-TSA	Tier 3
191070801001020	unknown	Non-TSA	Tier 3

# CITY OF KEOTA

225 E. Broadway Avenue PO Box 77 Keota, Iowa 52248 641-636-2266 keotacityhall@cloudburst9.net keotaiowa.org

July 6, 2021

The City of Keota is and has always been proud of its history. Cloudburst9 was founded in Keota, Iowa, and has been an active service in Keota ever since. Cloudburst9 has been a viable provider and partner since 2006 and the City wants to continue that relationship and help evolve from a wireless to a fiber to the home network. A great deal of residents currently use their service and in turn Cloudburst9 has supported local businesses, organizations, and events here in town for a number of years.

Cloudburst9 has been a valuable asset to Keota, providing broadband for 15 years to fill the gap in services offered by the incumbent providers. There are many lowa cities and towns that are seeking to get fiber optic networks constructed. By having Cloudburst9 pair their current reliable service with a new fiber network, it will allow Keota to continue to grow and flourish. Reliable broadband speeds up to 1 Gigabit will support the growing City demands and greatly assist from an Economic Development perspective. The City of Keota supports Cloudburst9 and their endeavor to bring a fiber optic network to Keota.

Anthony Cansler, Mayor

Mike Bender, Councilman

Matt Greiner, Councilman

Keith Conrad, Councilman

Rod Hill, Councilman

Heath McDonald, Councilman

## APPENDIX C THIRD-PARTY AFFIRMATIONS AND SUPPLEMENTAL EVIDENCE



#### STATE OF IOWA

KIM REYNOLDS, GOVERNOR ADAM GREGG, LT. GOVERNOR Annette Dunn Chief Information Officer

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

Local Internet Service Company Dave Magill dmagill@liscocorp.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 <a href="https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process">https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process</a> (see Docket Numbers 21-1014). 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. 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: <a href="https://ocio.iowa.gov/broadband-availability-map-version-4">https://ocio.iowa.gov/broadband-availability-map-version-4</a>. 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:

"Tier 1" means a maximum download speed of less than 25 Mbps and a maximum upload speed of less

<sup>&</sup>lt;sup>1</sup>See Iowa Code §§ 8B.1(12), 8B.10. See also Iowa Admin. Code r. 129—20.1, 20.3, 20.4.

<sup>&</sup>lt;sup>2</sup>See Iowa Admin. Code r. 129—20.3.

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.<sup>3</sup> 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

<sup>&</sup>lt;sup>3</sup>See 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	Local Internet Service Company, Inc.
Address	1680 Hwy 1, Suite 1500
City	Fairfield
State	IA
Zip	

#### **B. DESIGNATED CONTACT INFORMATION**

52556

Contact Name	David L. Magill
Contact Phone Number	641-209-7104
Contact Email	dmaqill@liscoco

#### 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 to the FCC or State of lowa 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 forr 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.

The listed census blocks are all in Keota, IA. LISCO no longer serves Keota. We will correct the map so that it is not sent again.

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:	Daw Z Majle
Title:	VP Administration & Legal Affairs
Date:	29-Jul-21

\*PLEASE READ BEFORE SIGNING: By signing and submitting this form, I, on my own behalf or as a representative of the company identified above, as applicable, expressly represent that I am authorized to make the above factual representation on behalf of said company and/or myself, as applicable, and under penalty of perjury as authorized by lowa Code section 622.1 and pursuant to the laws of the state of lowa, certify the following with respect to this form submitted on behalf of said company and/or myself: any statements, representations, warranties, certifications, or attestations made in this form, including any attachments or enclosures associated therewith, are true and accurate; I, on behalf of said company and/or myself, have not knowingly made any false statements or representations in this form. In addition to any criminal penalties authorized by lowa Code section 720.2 that may result from any false statements of material fact made herein or any other remedies available at law, equity, or otherwise, if it is subsequently determined that I have made a statement, representation, warranty, certification, or attestation in this form, or any attachments or enclosures associated herewith, that is later proven untrue in any material respect, the company on which I submitted this form on behalf of may be disqualified from current incentive programs administered by the Office 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

## 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
191070801001029	No		
191070801001040	No		
191070801001041			
191070801001042	No		
191070801001043			
191070801001045	-		
191070801001046	No		





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

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

Mediacom Communications Thomas Larsen tlarsen@mediacomcc.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 <a href="https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process">https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process</a> (see Docket Numbers 21-1002, 21-1014, 21-1021, 21-1023, 21-1031, 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. 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: <a href="https://ocio.iowa.gov/broadband-availability-map-version-4">https://ocio.iowa.gov/broadband-availability-map-version-4</a>. 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:

-

<sup>&</sup>lt;sup>1</sup>See Iowa Code §§ 8B.1(12), 8B.10. See also Iowa Admin. Code r. 129—20.1, 20.3, 20.4.

<sup>&</sup>lt;sup>2</sup>See 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.<sup>3</sup> 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

<sup>&</sup>lt;sup>3</sup>See 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	Mediacom Iowa LLC
Address	1 Mediacom Way
City	Mediacom Park
State	NY
Zip	

**B. DESIGNATED CONTACT INFORMATION** 

10918

Contact Name Thomas Larsen
Contact Phone Number 845-443-2754

Contact Email <u>tlarsen@mediacomcc.com</u>

#### 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 to the FCC or State of lowa 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 forr 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.

Mediacom facilitates material broadband service at speeds of 1000 Mbps down by 50 Mbps up in 185 of the census blocks identified on the affirmation page. Mediacom does not facilitate material broadband service to 37 of the census blocks identified on the affirmation page. As supporting documentation, Mediacom is attaching a list of serviceable addresses from our billing system within the 185 census blocks in which we facilitate material broadband services.

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:	302-
Title:SVP, Government & Public Relations	Thomas J. Larsen
Date:	29-Jul-21

\*PLEASE READ BEFORE SIGNING: By signing and submitting this form, I, on my own behalf or as a representative of the company identified above, as applicable, expressly represent that I am authorized to make the above factual representation on behalf of said company and/or myself, as applicable, and under penalty of perjury as authorized by lowa Code section 622.1 and pursuant to the laws of the state of lowa, certify the following with respect to this form submitted on behalf of said company and/or myself: any statements, representations, warranties, certifications, or attestations made in this form, including any attachments or enclosures associated therewith, are true and accurate; I, on behalf of said company and/or myself, have not knowingly made any false statements or representations in this form. In addition to any criminal penalties authorized by lowa Code section 720.2 that may result from any false statements of material fact made herein or any other remedies available at law, equity, or otherwise, if it is subsequently determined that I have made a statement, representation, warranty, certification, or attestation in this form, or any attachments or enclosures associated herewith, that is later proven untrue in any material respect, the company on which I submitted this form on behalf of may be disqualified from current incentive programs administered by the Office 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 communicated through this form as ne

## 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
190019603004073	Correct	1000	50
190019603004074	In Error	N/A	N/A
190019603004083	*** = * * * *	N/A	N/A
190019603004164	In Error	N/A	N/A
190019603004174	In Error	N/A	N/A
190019603004175	In Error	N/A	N/A
190059603001001	Correct	1000	50
190059603001002	Correct	1000	50
190059603001003		1000	50
190059603001004		1000	50
190059603001005		1000	50
190059603001006	Correct	1000	50
190059603001007	Correct	1000	50

190059603001008	Correct	1000	50
190059603001009	Correct	1000	50
190059603001010	Correct	1000	50
190059603001011	Correct	1000	50
190059603001012	Correct	1000	50
190059603001013	Correct	1000	50
190059603001014	Correct	1000	50
190059603001015	Correct	1000	50
190059603001016	Correct	1000	50
190059603001017	Correct	1000	50
190059603001018	Correct	1000	50
190059603001019	Correct	1000	50
190059603001020	Correct	1000	50
190059603001021	Correct	1000	50
190059603001022	Correct	1000	50
190059603001023	Correct	1000	50
190059603001024	Correct	1000	50
190059603001025	Correct	1000	50
190059603001026	Correct	1000	50
190059603001027	Correct	1000	50
190059603001028	Correct	1000	50
190059603001029	Correct	1000	50
190059603001030	Correct	1000	50
190059603002002	Correct	1000	50
190059603002003	Correct	1000	50
190059603002004	Correct	1000	50
190059603002005	In Error	N/A	N/A
190059603002006	Correct	1000	50
190059603002007	In Error	N/A	N/A
190059603002008	Correct	1000	50
190059603002009	Correct	1000	50
190059603002010	Correct	1000	50
190059603002018	Correct	1000	50
190059603002019	Correct	1000	50
190059603002020	Correct	1000	50
190059603002021	Correct	1000	50

190059603002022	Correct	1000	50
190059603002023	Correct	1000	50
190059603002024	Correct	1000	50
190059603002025	Correct	1000	50
190059603002026	Correct	1000	50
190059603002032	Correct	1000	50
190059603002033	Correct	1000	50
190059603002034	Correct	1000	50
190059603002035	Correct	1000	50
190059603002036	Correct	1000	50
190059603002037	Correct	1000	50
190059603002038	Correct	1000	50
190059603002039	Correct	1000	50
190059603002040	Correct	1000	50
190059603002041	Correct	1000	50
190059603002042	Correct	1000	50
190059603002043	Correct	1000	50
190059603002044	Correct	1000	50
190059603002045	Correct	1000	50
190059603002046	Correct	1000	50
190059603002047	Correct	1000	50
190059603002048	Correct	1000	50
190059603002049	Correct	1000	50
190059603003001	Correct	1000	50
190059603003002	Correct	1000	50
190059603003003	In Error	N/A	N/A
190059603003004	Correct	1000	50
190059603003005	Correct	1000	50
190059603003006	Correct	1000	50
190059603003007	Correct	1000	50
190059603003008	Correct	1000	50
190059603003009	Correct	1000	50
190059603003010	Correct	1000	50
190059603003011	Correct	1000	50
190059603003012	Correct	1000	50
190059603003013	Correct	1000	50

190059603003014	Correct	1000	50
190059603003015	Correct	1000	50
190059603003016	Correct	1000	50
190059603003017	Correct	1000	50
190059603003018	Correct	1000	50
190059603003019	Correct	1000	50
190059603003020	Correct	1000	50
190059603003021	Correct	1000	50
190059603003022	Correct	1000	50
190059603003023	Correct	1000	50
190059603003024	Correct	1000	50
190059603003025	Correct	1000	50
190059603003026	Correct	1000	50
190059603003027	Correct	1000	50
190059603003028	Correct	1000	50
190059603003029	Correct	1000	50
190059603003030	Correct	1000	50
190059603003031	Correct	1000	50
190059603003032	Correct	1000	50
190059603003033	Correct	1000	50
190059603003034	Correct	1000	50
190059603003035	Correct	1000	50
190059603003036	Correct	1000	50
190059603003037	Correct	1000	50
190059603003038	Correct	1000	50
190059603003040	Correct	1000	50
190059603003041	Correct	1000	50
190059603004000	Correct	1000	50
190059603004001	Correct	1000	50
190059603004002	Correct	1000	50
190059603004003	Correct	1000	50
190059603004006	Correct	1000	50
190059603004007	Correct	1000	50
190059603004008	Correct	1000	50
190059603004009	Correct	1000	50
190059603004010	Correct	1000	50

190059603004011	Correct	1000	50
190059603004012	Correct	1000	50
190059603004015	Correct	1000	50
190059603004016	Correct	1000	50
190059603004017	Correct	1000	50
190059603004018	Correct	1000	50
190059603004019	Correct	1000	50
190059603004028	Correct	1000	50
190059603004030	Correct	1000	50
190059603004031	Correct	1000	50
190059603004032	Correct	1000	50
190059603004033	Correct	1000	50
190059603004034	Correct	1000	50
190059603004040	In Error	N/A	N/A
190059603004041	In Error	N/A	N/A
190059603004042	In Error	N/A	N/A
190119607001002	Correct	1000	50
190119607002007	In Error	N/A	N/A
190119607003065	In Error	N/A	N/A
190130027002014	No	N/A	N/A
190130027002016	No	N/A	N/A
190130027002019	No	N/A	N/A
190490502003003	In Error	N/A	N/A
190490503003007	In Error	N/A	N/A
190959601003030	In Error	N/A	N/A
190959601003032	In Error	N/A	N/A
190959601003033	In Error	N/A	N/A
190959602004001	Correct	1000	50
190959602004012	Correct	1000	50
190959602004021	Correct	1000	50
190959602004024	Correct	1000	50
190959602004025	Correct	1000	50
190959602004026	In Error	N/A	N/A
190959602004143	In Error	N/A	N/A
190959602004145	Correct	1000	50
190959602004147	In Error	N/A	N/A

190959602004150	In Error	N/A	N/A
190959602004159	In Error	N/A	N/A
190959602004160	In Error	N/A	N/A
191070801001004	No	N/A	N/A
191070801001006	Yes	1000	50
191070801001007	No	N/A	N/A
191070801001008	No	N/A	N/A
191070801001009	Yes	1000	50
191070801001010	Yes	1000	50
191070801001011	Yes	1000	50
191070801001012	Yes	1000	50
191070801001013	Yes	1000	50
191070801001014	Yes	1000	50
191070801001015	Yes	1000	50
191070801001016	Yes	1000	50
191070801001017	Yes	1000	50
191070801001018	Yes	1000	50
191070801001019	Yes	1000	50
191070801001020	Yes	1000	50
191070801001021	Yes	1000	50
191070801001022	Yes	1000	50
191070801001023	Yes	1000	50
191070801001024	Yes	1000	50
191070801001025	Yes	1000	50
191070801001026	Yes	1000	50
191070801001027	Yes	1000	50
191070801001028	Yes	1000	50
191070801001029	Yes	1000	50
191070801001030	Yes	1000	50
191070801001031	Yes	1000	50
191070801001032	Yes	1000	50
191070801001033	Yes	1000	50
191070801001034	Yes	1000	50
191070801001035	Yes	1000	50
191070801001036	Yes	1000	50
191070801001037	Yes	1000	50

191070801001038	Yes	1000	50
191070801001039	Yes	1000	50
191070801001040	Yes	1000	50
191070801001041	Yes	1000	50
191070801001042	Yes	1000	50
191070801001043	In Error	N/A	N/A
191070801001044	Correct	1000	50
191070801001045	Correct	1000	50
191070801001046	Correct	1000	50
191070801001047	Correct	1000	50
191070801001048	Correct	1000	50
191070801001049	Correct	1000	50
191070801001050	Correct	1000	50
191070801001051	In Error	N/A	N/A
191070801001053	Correct	1000	50
191070801001054	Correct	1000	50
191070801001055	Correct	1000	50
191070801001056	Correct	1000	50
191070801001057	Correct	1000	50
191070801001058	Correct	1000	50
191070801001059	Correct	1000	50
191070801001060	Correct	1000	50
191070801001061	In Error	N/A	N/A
191070801001062	Correct	1000	50
191070801001063	In Error	N/A	N/A
191070801001064	Correct	1000	50
191839605001168	In Error	N/A	N/A
191839605001169	In Error	N/A	N/A
191839605001170	In Error	N/A	N/A



STATE OF IOWA

KIM REYNOLDS, GOVERNOR ADAM GREGG, LT. GOVERNOR Annette Dunn Chief Information Officer

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 <a href="https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process">https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process</a> (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. 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: <a href="https://ocio.iowa.gov/broadband-availability-map-version-4">https://ocio.iowa.gov/broadband-availability-map-version-4</a>. Overall, the new map reflects Targeted Service Areas

<sup>&</sup>lt;sup>1</sup>See Iowa Code §§ 8B.1(12), 8B.10. See also Iowa Admin. Code r. 129—20.1, 20.3, 20.4.

<sup>&</sup>lt;sup>2</sup>See 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.<sup>3</sup> 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

<sup>&</sup>lt;sup>3</sup>See 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

Address
City
State
Zip

Windstream Corporation
115 S. 2nd Ave W
Newton
Iowa
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 to the FCC or State of lowa 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 forr 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 lowa Code section 622.1 and pursuant to the laws of the state of lowa, certify the following with respect to this form submitted on behalf of said company and/or myself: any statements, representations, warranties, certifications, or attestations made in this form, including any attachments or enclosures associated therewith, are true and accurate; I, on behalf of said company and/or myself, have not knowingly made any false statements or representations in this form. In addition to any criminal penalties authorized by lowa Code section 720.2 that may result from any false statements of material fact made herein or any other remedies available at law, equity, or otherwise, if it is subsequently determined that I have made a statement, representation, warranty, certification, or attestation in this form, or any attachments or enclosures associated herewith, that is later proven untrue in any material respect, the company on which I submitted this form on behalf of may be disqualified from current incentive programs administered by the Office 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

CENSUS BLOCK ID	Do you Facilitate service to more than 10% of the geographic area of the Census Block?	Downloa d Speed	-	Windstream Response
190230705002066	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002023	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002079	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002080	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190490505002081	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002082	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002083	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190490505002084	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190490505002085	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002088	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002089	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002090	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002091	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002093	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002094	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002095	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002096	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002097	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002098	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190490505002099	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002123	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002124	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002129	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002130	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001032	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001033	Yes	85.721	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001034	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001037	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001038	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190779501001039	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001040	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001041	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001042	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001043	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001044	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001045	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block

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190779501001046	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001047	Yes	85.721	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001048	Yes	200	50	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001049	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001050	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001051	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001052	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001053	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001054	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001055	Yes	111.28	73.728	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001056	Yes	90	15	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001058	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001059	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001061	No	47.317	2.621	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190779501001094	Yes	150	50	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001095	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001096	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001097	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001098	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001099	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001100	Yes	150	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001104	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001105	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001106	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001107	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001108	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001109	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190779501001110	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001111	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001112	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001116	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190779501001117	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001118	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001119	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001120	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001121	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001122	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001138	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block

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190779501001139	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001140	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001142	Yes	150	50	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001143	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001312	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001313	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001314	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001315	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001316	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001317	Yes	90	15	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001318	Yes	85.721	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001319	Yes	85.721	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001320	Yes	150	50	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001321	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001322	Yes	100	30	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001323	Yes	90	15	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001324	Yes	73.007	11.928	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001325	Yes	73.007	11.928	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779501001326	No	47.317	2.621	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190779501001327	Yes	73.007	11.928	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001004	Yes	73.007	11.928	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001043	Yes	85.721	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001044	Yes	85.721	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001045	Yes	85.721	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001046	Yes	85.721	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001048	No	47.317	2.621	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190779502001049	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001050	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001051	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001052	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001053	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001054	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190779502001055	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001058	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001060	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001062	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001064	Yes	150	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001065	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block

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190779502001066	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001067	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001068	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001069	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001070	Yes	183.501	73.728	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001071	No	47.317	2.621	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190779502001072	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001073	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001074	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001075	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001076	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001077	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001078	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001079	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001080	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001082	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001083	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001084	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001085	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001086	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001087	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001088	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001089	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001092	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001095	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001097	Yes	85.721	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001099	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001100	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001101	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001102	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001103	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001104	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001105	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001106	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001127	Yes	73.007	11.928	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001297	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001298	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190779502001299	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block

1010-0001001	· · · · · · · · · · · · · · · · · · ·	444.00	04.000	No. 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
191070801001006	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001007	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
191070801001009	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001010	Yes	85.721	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001011	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001012	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001013	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001014	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001015	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001016	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001017	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001018	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001019	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001020	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001021	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001022	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001023	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001024	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001025	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001026	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001027	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001028	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001029	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001030	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001031	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001032	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001033	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001034	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001035	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001036	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001037	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001038	Yes	150	50	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001039	Yes	150	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001040	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001041	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001042	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001043	Yes	150	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001044	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block

191070801001045	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001046	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001047	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001048	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001049	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001050	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001051	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001052	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001053	Yes	150	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001054	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001055	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001056	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001057	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001058	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001059	Yes	150	50	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001060	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001061	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001062	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001063	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801001064	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191070801002079	No	4.8	1.024	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
191070801002101	No	12.032	2.048	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
191070801002107	Yes	1000	1000	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839602003035	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839602003036	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839602003039	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191659602001117	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191550215012069	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190090703001057	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019602002027	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019602002028	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019602002029	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019602002030	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019602002032	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019602002054	No	4.8	1.024	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190019602002075	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019602002083	Yes	73.007	11.928	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019603004000	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block

190019603004003	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019603004004	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019603004005	Yes	109.056	36.864	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019603004007	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019603004014	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190019603004016	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019603004017	Yes	81.792	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019603004019	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019603004053	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019603004073	No	47.317	2.621	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190019603004074	No	31.195	1.966	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190019603004080	No	81.792	9.6	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190019603004089	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190019603004110	Yes	81.792	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606002006	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606002007	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606002008	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606002009	Yes	36.864	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606002012	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606002013	Yes	75	5	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606002015	Yes	109.056	36.864	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606002016	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606002017	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606002018	Yes	54.528	36.864	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606002032	Yes	109.056	36.864	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606002083	Yes	150	50	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606002084	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606002085	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190119606002087	No	85.721	36.864	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190119606003105	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606003106	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190119606003110	Yes	96.076	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606003112	Yes	81.792	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606003114	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606003115	Yes	109.056	36.864	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606003117	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606003118	Yes	81.792	36.864	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119606003120	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block

190119607001000	Yes	81.792	36.864	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119607001001	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119607001002	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119607001003	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119607002000	Yes	109.056	36.864	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119607002001	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119607002002	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119607002006	No	27.394	2.097	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190119607002007	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190119607002009	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959601003028	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190959601003029	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959601003058	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959601003060	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602001084	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602001086	Yes	36.864	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602001087	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602001089	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602001095	Yes	109.056	36.864	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602001097	Yes	109.056	36.864	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602001098	Yes	100	20	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602001099	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002000	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002001	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002002	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002003	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002004	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002005	Yes	109.056	36.864	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002006	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190959602002007	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002014	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002015	Yes	50	5	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002016	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002017	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002018	No	28.8	2.048	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190959602002019	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002020	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002021	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block

190959602002022	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002022	Yes	109.056	36.864	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
190959602002025	Yes	109.056	9.6	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
190959602002027	Yes	50	5	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
	Yes	109.056	36.864	
190959602002028				Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002029	Yes	75	5	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002030	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002032	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002036	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002037	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002038	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002039	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002070	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002103	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602002104	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602003000	No	4.8	1.024	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190959602003001	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602003026	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602003028	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602004012	No	109.056	9.6	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190959602004017	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602004018	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602004019	No	4.8	1.024	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190959602004020	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602004021	Yes	81.792	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602004024	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602004025	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602004142	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602004142	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602004143	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602004145	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602004147	Yes	54.528	4.8	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602004148	Yes	81.792	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602004154	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190959602004160	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191573701002058	Yes	54.528	4.8	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191573701002059	Yes	36.864	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191573701002076	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block

191712906003001	Yes	150	50	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191712906003002	Yes	85.721	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191712906003011	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191712906003013	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191712906003018	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191712906003020	Yes	36.864	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191712906003021	Yes	85.721	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191712906003031	Yes	81.792	36.864	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191712906003071	Yes	50	5	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191712906003072	Yes	81.792	36.864	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191712906003082	Yes	54.528	4.8	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191712906003085	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191712906003086	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191712906003088	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191712906003089	No	3.584	0.768	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
191712906003090	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191712906004080	Yes	36.864	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191712906004081	Yes	36.864	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001014	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001015	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001016	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001017	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001018	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001019	Yes	85.721	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001020	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001021	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001022	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001023	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001024	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001025	Yes	150	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001026	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001027	Yes	150	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001029	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001030	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001031	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001032	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001033	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001034	Yes	150	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block

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191130102001035	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001036	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001038	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001040	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001084	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001001	Yes	85.721	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001006	Yes	73.007	11.928	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001008	No	96.076	23.069	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
191130102001012	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001037	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001041	Yes	73.007	11.928	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001045	No	31.195	1.966	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
191130102001046	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001050	Yes	60	10	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001051	No	47.317	2.048	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
191130102001071	No	40	2	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
191130102001072	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001073	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001074	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191130102001075	Yes	150	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190199506002017	Yes	54.528	4.8	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190199506002056	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190199506002060	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190199506002094	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190199506002095	No	28.8	2.048	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190199506002106	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190199506002110	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190150206001212	Yes	81.792	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190150206001215	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190150206001250	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190150206001255	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190150206001256	Yes	54.528	4.8	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190150206001257	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190150206001259	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190150206001283	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490502002039	No	31.195	2.048	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190490505001073	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001104	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block

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190490505001112	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001113	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001114	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001116	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001120	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001121	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001122	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001127	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001128	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001129	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001130	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190490505001134	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001135	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001145	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001146	Yes	100	20	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001147	Yes	100	20	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001148	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001149	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
190490505001168	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001169	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190730801001117	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190730801001119	Yes	81.792	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190730801001120	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190730801001153	Yes	54.528	4.8	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190730801001161	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001171	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001176	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001177	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001178	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001179	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505001182	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002004	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002005	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002006	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002007	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002008	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002048	Yes	81.792	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002049	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block

190490505002051	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002052	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002053	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002058	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002060	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002061	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002062	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002064	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002065	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002070	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002070	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002071	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002072	Yes	25	3.0	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002074	Yes	109.056	9.6	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002077	Yes	25	3.0	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490505002122	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
190490507001003	Yes	25	3	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001139	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001133	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001145	Yes	150	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001146	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001147	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001148	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001149	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001150	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001151	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001152	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001153	No	0		Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block
191839605001157	Yes	208.667	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001158	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001159	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001160	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001161	Yes	96.076	23.069	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001163	Yes	200	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001164	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001165	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001166	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001168	No	0	0	Windstream is not capable of providing 25/3 service to >=10% of the locations in this census block

191839605001169	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001170	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001174	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001180	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001181	Yes	111.28	31.982	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605001182	Yes	123.208	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605002017	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605002018	Yes	183.501	128	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605002023	Yes	85.721	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605002024	Yes	85.721	17.039	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block
191839605002029	Yes	183.501	51.773	Windstream is capable of providing 25/3 service to >=10% of the locations in this census block



STATE OF IOWA

KIM REYNOLDS, GOVERNOR ADAM GREGG, LT. GOVERNOR Annette Dunn Chief Information Officer

August 12, 2021

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

United States Cellular Corporation Justin Frakes Justin.Frakes@uscellular.com (Sent via email only)

## 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 <a href="https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process">https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process</a> (see Docket Numbers 21-008, 21-014, 21-042, 21-066, 21-1001, 21-1014, 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 17, 2021.

On July 1, 2021, the Office 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. V4 of the Map, and a detailed background of the same, can be found at: <a href="https://ocio.iowa.gov/broadband-availability-map-version-4">https://ocio.iowa.gov/broadband-availability-map-version-4</a>. 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:

"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

200 East Grand Ave, Des Moines, Iowa 50309

515.218.1413

<sup>&</sup>lt;sup>1</sup>See Iowa Code §§ 8B.1(12), 8B.10. See also Iowa Admin. Code r. 129—20.1, 20.3, 20.4.

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.<sup>2</sup> 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 17, 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 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).

<sup>&</sup>lt;sup>2</sup>See Iowa Code § 8B.10(2); Iowa Admin. Code r. 129—20.5.

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 17, 2021, 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** RESPONDENT INFORMATION Company Name United States Cellular Corporation 8410 W. Bryn Mawr Address City Chicago State Illinois Zip 60631 В. **DESIGNATED CONTACT INFORMATION** Contact Name Thomas Hulings Contact Phone Number 773-355-3625 Contact Email thomas.hulings@uscellular.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 to the FCC or State of lowa 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.

UScellular attests to facilitating service at a minimum of 25/3 Mbps in 1 of the census blocks identified in the OCIO's August 12 letter. This block was upgraded to 25/3 Mbps Broadband as part of USCC's NOFA #003 submission and were in service on July 1, 2021.

# 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:	Thomas Hulings
Title:	Dir. Business Development & Partnerships
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 lowa Code section 622.1 and pursuant to the laws of the state of lowa, certify the following with respect to this form submitted on behalf of said company and/or myself: any statements, representations, warranties, certifications, or attestations made in this form, including any attachments or enclosures associated therewith, are true and accurate; I, on behalf of said company and/or myself, have not knowingly made any false statements or representations in this form. In addition to any criminal penalties authorized by lowa Code section 720.2 that may result from any false statements of material fact made herein or any other remedies available at law, equity, or otherwise, if it is subsequently determined that I have made a statement, representation, warranty, certification, or attestation in this form, or any attachments or enclosures associated herewith, that is later proven untrue in any material respect, the company on which I submitted this form on behalf of may be disqualified from current incentive programs administered by the Office 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

# 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
190779503001127	Yes	25	3
191839605002017	No		
191839605002029			
191070801001051	No		



# STATE OF IOWA

KIM REYNOLDS, GOVERNOR ADAM GREGG, LT. GOVERNOR Annette Dunn Chief Information Officer

August 12, 2021

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

West Liberty Telephone Company dba Cloudburst 9
Jerry Melick
jsmelick@corp.lcom.net
(Sent via email only)

## 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 <a href="https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process">https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process</a> (see Docket Numbers 21-014, 21-017, 21-041, 21-042, 21-045, 21-046, 21-058, 21-066, 21-071, 21-074, 21-076, 21-091, 21-099, 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 17, 2021.

On July 1, 2021, the Office 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. V4 of the Map, and a detailed background of the same, can be found at: <a href="https://ocio.iowa.gov/broadband-availability-map-version-4">https://ocio.iowa.gov/broadband-availability-map-version-4</a>. 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:

"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

200 East Grand Ave, Des Moines, Iowa 50309

515.218.1413

<sup>&</sup>lt;sup>1</sup>See Iowa Code §§ 8B.1(12), 8B.10. See also Iowa Admin. Code r. 129—20.1, 20.3, 20.4.

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.<sup>2</sup> 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 17, 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 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).

<sup>&</sup>lt;sup>2</sup>See Iowa Code § 8B.10(2); Iowa Admin. Code r. 129—20.5.

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 17, 2021, 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	Cloudburst 9, LLC	
Address	413 North Calhoun Street	
City	West Liberty	
State	lowa	
Zin	52776	

#### B. DESIGNATED CONTACT INFORMATION

Contact Name	Vicki Hall
Contact Phone Number	319-627-0226
Contact Email	hall@corp.lcom.ne

#### C. AFFIRMATION

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Docket 21-014 has verified that they have access to 50/5 service with CB9 which is census block #191839605002017 which is a bandwidth more than the speed that we are facilitating and thereby confirms that we can offer at least 25/3 in this area. Kalona is an affiliated with Cloudburst 9, LLC being 45% owner and Docket #1044 is not appealing Cloudburst 9 facilitated services. Docket 21-042 is a Non-TSA block and not a Tier 1 block. Docket 21-066 is invalid because there are not any HSBs in this census block. Census blocks answered as "NO" are tough to determine because it is based upon line of sight which requires a site survey.

# 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:	\s\Vicki Hall	
Title:	Manager	
Date:	8/17/2021	

\*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 lowa Code section 622.1 and pursuant to the laws of the state of lowa, certify the following with respect to this form submitted on behalf of said company and/or myself: any statements, representations, warranties, certifications, or attestations made in this form, including any attachments or enclosures associated therewith, are true and accurate; I, on behalf of said company and/or myself, have not knowingly made any false statements or representations in this form. In addition to any criminal penalties authorized by lowa Code section 720.2 that may result from any false statements of material fact made herein or any other remedies available at law, equity, or otherwise, if it is subsequently determined that I have made a statement, representation, warranty, certification, or attestation in this form, or any attachments or enclosures associated herewith, that is later proven untrue in any material respect, the company on which I submitted this form on behalf of may be disqualified from current incentive programs administered by the Office 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

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CENSUS BLOCK ID	Do you Facilitate service to more than 10% of the geographic area of the Census Block?	Download Speed	Upload Speed	
191839605002017	Yes	25	3	
191839605001157	No			
191839605002029	Yes	25	3	
191070801001051	Yes	50	5	
191839605001148				
191839605001163	_			
191839605001164	=			
191839605001166	No			