

<b>FINAL AGENCY DECISION</b> <b>STATEWIDE BROADBAND AVAILABILITY MAP VERSION 4 APPEAL</b> <b>September 14, 2021</b>	
<b>DOCKET NO. 21-1031</b>	
<b>A. APPELLANT INFORMATION</b>	
Company Name	Shellsburg Cablevision, Inc. dba USA Communications
Address	124 Main St E SW
City	Shellsburg
State	Iowa
Zip	52332
<b>B. DESIGNATED CONTACT INFORMATION</b>	
Contact Name	Curt Eldred
Contact Phone Number	319-436-2224
Contact Email	<a href="mailto:CEldred@usacomm.coop">CEldred@usacomm.coop</a>
<b>C. APPEAL TYPE</b>	
<input type="checkbox"/>	Resident Challenge
<input type="checkbox"/>	First-Party Provider Challenge
<input checked="" type="checkbox"/>	Third-Party Provider Challenge
<b>D. EVIDENCE CONSIDERED</b>	
<p>With respect to the Census Blocks forming the basis of this Appeal, the Office has reviewed the evidence and information submitted by Appellant related thereto (see Appendix B for original submission), in conjunction with the maps and data sources originally utilized in determining the TSA designation of these Census Blocks, and made a determination as to the Census Block TSA Tier designations as set forth in Appendix A.</p> <p><input checked="" type="checkbox"/> 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.</p> <p><input type="checkbox"/> If checked, Appellant submitted additional information in support of its Appeal. This information has been considered by the Office in making its Final Decision.</p> <p><input type="checkbox"/> 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.</p> <p><input checked="" type="checkbox"/> If checked, the Office sent requests for additional information to Third-Party Provider(s) concerning whether reported broadband service was Facilitated in one or more blocks of this Appeal as reflected on Map V4 as of July 1, 2021. The Office may have received Affirmation(s) and/or other evidence from Third-Party Provider(s) in response to such requests. Refer to Appendix C for a record of these efforts.</p> <p>Go to <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> for more information regarding how the Office evaluates evidence and decides tier designations for appealed blocks.</p>	
<b>E. TO APPEAL FURTHER</b>	
<p>The Office will post its Final Decisions on its website at <a href="https://ocio.iowa.gov/broadband">ocio.iowa.gov/broadband</a>. 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:</p> <p>Office of the Chief Information Officer  c/o Matt Behrens  200 E. Grand Avenue  Des Moines, Iowa 50309</p> <p>In so doing, the reason for further appealing this Decision must be stated, specifically identifying the particular aspects of the Decision with which Appellant disagrees and the reasons why, whether factual or legal in nature. The request for a contested case proceeding should state the name and address of the requester; identify the specific Office action which is disputed; and, where the requester is represented by a lawyer, identify the provisions of law or precedent requiring or authorizing the holding of a contested case proceeding in the particular circumstances involved, and include a short and plain statement of the issues of material fact in dispute. Iowa Admin. Code r. 129–6.4.</p> <p>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).</p>	
<b>SIGNED</b>	
<b>DATE</b>	
	Matt Behrens Deputy Chief Information Officer State of Iowa

## APPENDIX A - FINAL DECISION

### DEFINITIONS

<b>Targeted Service Area</b>	A Targeted Service Area (TSA) is a census block within which no communications service provider offers or facilitates broadband service at or above the tier 1, tier 2, or tier 3 download and upload speeds, as applicable.					
<b>Tier 1</b>	A maximum download speed of less than 25 megabits per second (Mbps) and a maximum upload speed of less than 3 Mbps.					
<b>Tier 2</b>	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.					
<b>Tier 3</b>	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.					
<b>Non-TSA</b>	A non-TSA is a census block in which speeds are Facilitated at greater than or equal to 80 Mbps.					
<b>Facilitate</b>	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.					
<b>Map V4 Designation</b>	The speed tier reflected on the Map as of July 1, 2021.					
<b>Decision Basis</b>	The Decision Basis number reflected in this column corresponds to a general explanation for why this Office made its decision regarding the Block. The Decision Bases are posted on the website at <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> .					
<b>Overlapping Appeal</b>	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.					
<b>Prior Reporting</b>	The Prior Reporting column reflects information provided by Appellant on the Appeal. The Prior Reporting to FCC or Connected Nation may reflect one of the following:					
	In Error: Data was reported incorrectly to FCC or Connected Nation	Correct: Data was reported correctly to FCC or Connected Nation	No Response: Data was not reported to FCC or Connected Nation	Unknown: Data is incorrect for unknown reasons		

Docket No.	Census Block ID	Prior Reporting	Map V4 Designation	Appellant's Request	Final Agency Decision	Decision Basis	Overlapping Appeal
21-1031	190959602002034	Unknown	Non-TSA	Tier 1	Tier 1	1	
21-1031	191573701002002	Unknown	Non-TSA	Tier 1	Tier 1	1	
21-1031	190959602001089	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	190959602001095	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	190959601003032	Unknown	Non-TSA	Tier 1	Tier 1	1	
21-1031	190959601002040	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	191573701002058	Unknown	Non-TSA	Tier 1	Tier 3	2	
21-1031	190959601003028	Unknown	Tier 2	Tier 1	Tier 1	1	

21-1031	190959602004142	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	190959602001084	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	190119606002017	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	190959602004019	Unknown	Non-TSA	Tier 1	Tier 1	1	
21-1031	190959602002014	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	190959602002026	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	190959602001085	Unknown	Non-TSA	Tier 1	Tier 1	1	
21-1031	191712906003086	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	190959602004154	Unknown	Non-TSA	Tier 1	Tier 2	2	
21-1031	190119606003115	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	190959602003001	Unknown	Non-TSA	Tier 1	Tier 2	2	
21-1031	190959601003033	Unknown	Non-TSA	Tier 1	Tier 1	1	
21-1031	190959602002007	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	190959602004147	Unknown	Non-TSA	Tier 1	Tier 3	2	
21-1031	190959602002015	Unknown	Non-TSA	Tier 1	Tier 3	2	
21-1031	191712906004142	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	190959602002029	Unknown	Non-TSA	Tier 1	Tier 3	2	
21-1031	190119606002087	Unknown	Non-TSA	Tier 1	Tier 1	1	
21-1031	190119606003110	Unknown	Non-TSA	Tier 1	Non-TSA	3	
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21-1031	190959602003028	Unknown	Non-TSA	Tier 1	Tier 2	2	
21-1031	190959602002035	Unknown	Non-TSA	Tier 1	Tier 1	1	
21-1031	190119606002084	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	191712906004084	Unknown	Tier 2	Tier 1	Tier 1	1	
21-1031	190959602002030	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	191712906003021	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	190119607002009	Unknown	Non-TSA	Tier 1	Non-TSA	3	
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21-1031	190959602002004	Unknown	Non-TSA	Tier 1	Tier 2	2	
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21-1031	191712906004081	Unknown	Non-TSA	Tier 1	Non-TSA	3	
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21-1031	190959602001096	Unknown	Non-TSA	Tier 1	Tier 1	1	
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21-1031	190959602004012	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	191712906003031	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	190959602002012	Unknown	Non-TSA	Tier 1	Tier 1	1	
21-1031	190119607002000	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	191573701002062	Unknown	Non-TSA	Tier 1	Tier 1	1	
21-1031	190959601003035	Unknown	Tier 2	Tier 1	Tier 1	1	
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21-1031	190959602002000	Unknown	Non-TSA	Tier 1	Tier 1	1	
21-1031	190959602002019	Unknown	Non-TSA	Tier 1	Non-TSA	3	
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21-1031	190119606002016	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	191712906003085	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	190119607002006	Unknown	Non-TSA	Tier 1	Non-TSA	3	
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21-1031	190959602004145	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1031	190959602002022	Unknown	Non-TSA	Tier 1	Non-TSA	3	

**APPENDIX B**  
**CERTIFICATION AND SUPPORTING INFORMATION**





Grants, OCIO &lt;ociogrants@iowa.gov&gt;

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## USA Communications - Challenge Form

1 message

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**Shelby Pardy** <shelby.pardy@vantagepnt.com>

Tue, Jul 20, 2021 at 4:16 PM

To: "ociogrants@iowa.gov" <ociogrants@iowa.gov>

Cc: Curt Eldred <CEldred@usacomm.coop>, Eric Rajchel <Eric.Rajchel@vantagepnt.com>, Kristy Szabo <Kristy.Szabo@vantagepnt.com>

Good Afternoon,

On behalf of USA Communications, please find attached the Challenge Form listing the Census Blocks USA Communications is challenging.

Please let me know if you have any questions.

Thanks!

**Shelby Pardy**

*Analyst*

Direct: 605.995.1818

[Shelby.Pardy@Vantagepnt.com](mailto:Shelby.Pardy@Vantagepnt.com)



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

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**NOFA #006 - USA Communications - Challenge Form .xlsx**  
180K



A. APPELANT INFORMATION	
Company Name	Shellsburg Cablevision, Inc. dba USA Communications
Address	124 Main St E SW
City	Shellsburg
State	Iowa
Zip	52332
B. DESIGNATED CONTACT INFORMATION	
Contact Name	Curt Eldred
Contact Phone Number	319-436-2224
Contact Email	<a href="mailto:CEldred@usacomm.coop">CEldred@usacomm.coop</a>
C. CERTIFICATION/ATTESTATION/AFFIRMATION	
In signing and submitting this form, the above-identified company, and its duly authorized representative signing on behalf thereof, hereby affirms, attests, and certifies under penalty of perjury that, as represented in its submission: Choose one option that describes company/affiliation status.	
<p>Company, consistent with the representations made in this form, and regardless of whether your company's prior reporting to to the FCC or State of Iowa was correct or in error as of July 1, 2021, either:</p> <p>(a.) Facilitated material Broadband service according to the designated Tier speed indicated on the Map; or <input type="checkbox"/></p> <p>(b.) Did NOT Facilitate Broadband according to the designated Tier speed in the identified census blocks.</p>	
<p>Another unaffiliated company, as of July 1, 2021, consistent with the representations made in this form, either: (a.) Facilitated material Broadband service according to the designated Tier speed indicated on the Map; or (b.) Did NOT Facilitate Broadband according to the designated Tier speed in the identified census blocks. <input checked="" type="checkbox"/></p>	
D. ADDITIONAL EXPLANATION (To the extent you believe additional explanation is required to ensure that you are communicating full and accurate information, please use the below space to further explain, qualify, or substantiate your above certification/attestation/affirmation. To the extent necessary, please feel free to upload additional explanations/supporting documentation.	
<p>Shellsburg Cablevision, Inc. dba USA Communications is submitting this challenge for the census blocks reflected herein as having broadband service offerings at speeds that are deeming the areas as ineligible for grant funding per the OCIO map. However, the speeds being reported by the service providers in these census blocks are overstated by the providers. USA Communications believes each of the census blocks included in this challenge should be deemed eligible for grant funding under the NOFA #006 and should be reflected as Tier 1 for funding support.</p>	
E. SIGNATURE* By typing your full name you are affixing your signature to this form and attesting to the accuracy of the information submitted herein.	
Authorized Signature:	Curt Eldred
Title:	General Manager
Date:	July 20, 2021

**\*PLEASE READ BEFORE SIGNING:** By signing and submitting this form, I, on my own behalf or as a representative of the company identified above, as applicable, expressly represent that I am authorized to make the above factual representation on behalf of said company and/or myself, as applicable, and under penalty of perjury as authorized by Iowa Code section 622.1 and pursuant to the laws of the state of Iowa, certify the following with respect to this form submitted on behalf of said company and/or myself: any statements, representations, warranties, certifications, or attestations made in this form, including any attachments or enclosures associated therewith, are true and accurate; I, on behalf of said company and/or myself, have not knowingly made any false statements or representations in this form. In addition to any criminal penalties authorized by Iowa Code section 720.2 that may result from any false statements of material fact made herein or any other remedies available at law, equity, or otherwise, if it is subsequently determined that I have made a statement, representation, warranty, certification, or attestation in this form, or any attachments or enclosures associated herewith, that is later proven untrue in any material respect, the company on which I submitted this form on behalf of may be disqualified from current incentive programs administered by the Office or may be ordered to repay the Office the entire amount of any funds previously distributed by the Office to said company in connection with any current incentive programs administered by the Office. OCIO makes no guarantees as to whether the information supplied by you will result in any change to the Broadband Availability Map V4 or the way any incentive decisions are reviewed, scored, or decided. This form, as completed, any attachments hereto, and any other information or materials submitted to the Office in connection with this form or related inquiry, shall be considered public records and shall be made available for public examination and/or disseminated upon request by third parties as required by Iowa Code chapter 22. The Office reserves the right to reject this form and relatedly consider any information communicated through this form as neither credible nor probative if this form is not fully and properly filled out.

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

<b>Targeted Service Area</b>	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.
<b>Existing Broadband Speed Tiers</b>	The speed tiers used to determine whether a broadband block qualifies as a Targeted Service Area on the Statewide Broadband Availability Map.
<b>Tier 1</b>	A maximum download speed of less than 25 megabits per second (Mbps) and a maximum upload speed of less than 3 Mbps.
<b>Tier 2</b>	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.
<b>Tier 3</b>	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.
<b>Non-TSA</b>	A non-TSA is a census block in which speeds are Facilitated at greater than equal to 80 Mbps
<b>Facilitate</b>	A communication service provider's ability to provide broadband service at or above the download and upload speeds defined above to a home, farm, school, or business within a commercially reasonable time and at a commercially reasonable price upon request by a consumer. This does <i>not</i> pertain to the Broadband Infrastructure used to facilitate said service; Broadband Infrastructure is <i>not</i> a basis for appeal.

CENSUS BLOCK ID	Prior Reporting to FCC or Connected Nation Definitions 1. <u>In Error</u> means data was reported incorrectly to FCC or Connected Nation. 2. <u>Correct</u> means data was reported correctly to FCC or Connected Nation. 3. <u>No Response</u> means data was not reported to FCC or Connected Nation. 4. <u>Unknown</u> means data is incorrect for unknown reasons	Speed Tier that is reflected on Map v.4	What do you believe the Map should reflect for Facilitated service as of July1, 2021?
190959602002034	Unknown	Non-TSA	Tier 1
191573701002002	Unknown	Non-TSA	Tier 1
190959602001089	Unknown	Non-TSA	Tier 1
190959602001095	Unknown	Non-TSA	Tier 1
190959601003032	Unknown	Non-TSA	Tier 1
190959601002040	Unknown	Non-TSA	Tier 1
191573701002058	Unknown	Non-TSA	Tier 1
190959601003028	Unknown	Non-TSA	Tier 1
190959602004142	Unknown	Non-TSA	Tier 1
190959602001084	Unknown	Non-TSA	Tier 1
190119606002017	Unknown	Non-TSA	Tier 1
190959602004019	Unknown	Non-TSA	Tier 1
190959602002014	Unknown	Non-TSA	Tier 1
190959602002026	Unknown	Non-TSA	Tier 1
190959602001085	Unknown	Non-TSA	Tier 1
191712906003086	Unknown	Non-TSA	Tier 1
190959602004154	Unknown	Non-TSA	Tier 1
190119606003115	Unknown	Non-TSA	Tier 1
190959602003001	Unknown	Non-TSA	Tier 1
190959601003033	Unknown	Non-TSA	Tier 1
190959602002007	Unknown	Non-TSA	Tier 1
190959602004147	Unknown	Non-TSA	Tier 1
190959602002015	Unknown	Non-TSA	Tier 1

191712906004142	Unknown	Non-TSA	Tier 1
190959602002029	Unknown	Non-TSA	Tier 1
190119606002087	Unknown	Non-TSA	Tier 1
190119606003110	Unknown	Non-TSA	Tier 1
191573701002054	Unknown	Non-TSA	Tier 1
190959602003028	Unknown	Non-TSA	Tier 1
190959602002035	Unknown	Non-TSA	Tier 1
190119606002084	Unknown	Non-TSA	Tier 1
191712906004084	Unknown	Non-TSA	Tier 1
190959602002030	Unknown	Non-TSA	Tier 1
191712906003021	Unknown	Non-TSA	Tier 1
190119607002009	Unknown	Non-TSA	Tier 1
190959602002006	Unknown	Non-TSA	Tier 1
190119606003118	Unknown	Non-TSA	Tier 1
190959602002004	Unknown	Non-TSA	Tier 1
191573701002056	Unknown	Non-TSA	Tier 1
191712906004081	Unknown	Non-TSA	Tier 1
191712906003088	Unknown	Non-TSA	Tier 1
190959602001096	Unknown	Non-TSA	Tier 1
190119607001002	Unknown	Non-TSA	Tier 1
190959602004012	Unknown	Non-TSA	Tier 1
191712906003031	Unknown	Non-TSA	Tier 1
190959602002012	Unknown	Non-TSA	Tier 1
190119607002000	Unknown	Non-TSA	Tier 1
191573701002062	Unknown	Non-TSA	Tier 1
190959601003035	Unknown	Non-TSA	Tier 1
191573701002001	Unknown	Non-TSA	Tier 1
190119606002032	Unknown	Non-TSA	Tier 1
190959602002038	Unknown	Non-TSA	Tier 1
191573701002063	Unknown	Non-TSA	Tier 1
190959602002024	Unknown	Non-TSA	Tier 1
190119607002002	Unknown	Non-TSA	Tier 1
190959602004001	Unknown	Non-TSA	Tier 1
190119606002007	Unknown	Non-TSA	Tier 1
190959602002018	Unknown	Non-TSA	Tier 1
190959602001097	Unknown	Non-TSA	Tier 1

190119606003111	Unknown	Non-TSA	Tier 1
190959602003026	Unknown	Non-TSA	Tier 1
190119606002009	Unknown	Non-TSA	Tier 1
190959602002071	Unknown	Non-TSA	Tier 1
190959602001099	Unknown	Non-TSA	Tier 1
190959602002005	Unknown	Non-TSA	Tier 1
190959602002008	Unknown	Non-TSA	Tier 1
190119607002007	Unknown	Non-TSA	Tier 1
190959602002027	Unknown	Non-TSA	Tier 1
190959602004020	Unknown	Non-TSA	Tier 1
190959602004024	Unknown	Non-TSA	Tier 1
191712906003001	Unknown	Non-TSA	Tier 1
190119606002014	Unknown	Non-TSA	Tier 1
190959601003029	Unknown	Non-TSA	Tier 1
191712906003067	Unknown	Non-TSA	Tier 1
190959602002011	Unknown	Non-TSA	Tier 1
190959602002016	Unknown	Non-TSA	Tier 1
191573701002059	Unknown	Non-TSA	Tier 1
191573701002061	Unknown	Non-TSA	Tier 1
190959602004026	Unknown	Non-TSA	Tier 1
190959602002002	Unknown	Non-TSA	Tier 1
190959602002017	Unknown	Non-TSA	Tier 1
191573701002077	Unknown	Non-TSA	Tier 1
190119607001001	Unknown	Non-TSA	Tier 1
190119607003065	Unknown	Non-TSA	Tier 1
190959602002009	Unknown	Non-TSA	Tier 1
191712906003072	Unknown	Non-TSA	Tier 1
191573701002000	Unknown	Non-TSA	Tier 1
191712906003020	Unknown	Non-TSA	Tier 1
191712906003018	Unknown	Non-TSA	Tier 1
190959602004018	Unknown	Non-TSA	Tier 1
190959602004160	Unknown	Non-TSA	Tier 1
190119606003106	Unknown	Non-TSA	Tier 1
190959602002001	Unknown	Non-TSA	Tier 1
190119606002020	Unknown	Non-TSA	Tier 1
190959602004025	Unknown	Non-TSA	Tier 1

191573701002004	Unknown	Non-TSA	Tier 1
190959602001087	Unknown	Non-TSA	Tier 1
190959602002103	Unknown	Non-TSA	Tier 1
191712906003089	Unknown	Non-TSA	Tier 1
190119606002008	Unknown	Non-TSA	Tier 1
190959602002070	Unknown	Non-TSA	Tier 1
190959602002037	Unknown	Non-TSA	Tier 1
191712906003002	Unknown	Non-TSA	Tier 1
190959602003000	Unknown	Non-TSA	Tier 1
190959602002033	Unknown	Non-TSA	Tier 1
191712906003082	Unknown	Non-TSA	Tier 1
190959601003030	Unknown	Non-TSA	Tier 1
190119606002029	Unknown	Non-TSA	Tier 1
190119606002083	Unknown	Non-TSA	Tier 1
190119606002039	Unknown	Non-TSA	Tier 1
190959602004148	Unknown	Non-TSA	Tier 1
190119606002012	Unknown	Non-TSA	Tier 1
190119607001000	Unknown	Non-TSA	Tier 1
191712906004080	Unknown	Non-TSA	Tier 1
190959602002104	Unknown	Non-TSA	Tier 1
190959602002028	Unknown	Non-TSA	Tier 1
190959602004159	Unknown	Non-TSA	Tier 1
190119606003117	Unknown	Non-TSA	Tier 1
190959602001086	Unknown	Non-TSA	Tier 1
190959602002003	Unknown	Non-TSA	Tier 1
191712906003011	Unknown	Non-TSA	Tier 1
190959602004000	Unknown	Non-TSA	Tier 1
190119606002006	Unknown	Non-TSA	Tier 1
190119606002018	Unknown	Non-TSA	Tier 1
190119606002085	Unknown	Non-TSA	Tier 1
190959602004143	Unknown	Non-TSA	Tier 1
190959602002013	Unknown	Non-TSA	Tier 1
190959602001098	Unknown	Non-TSA	Tier 1
190119606003112	Unknown	Non-TSA	Tier 1
190959602004017	Unknown	Non-TSA	Tier 1
190119606003114	Unknown	Non-TSA	Tier 1

190959602002032	Unknown	Non-TSA	Tier 1
191573701002057	Unknown	Non-TSA	Tier 1
190959602002023	Unknown	Non-TSA	Tier 1
191573701002076	Unknown	Non-TSA	Tier 1
190119607001003	Unknown	Non-TSA	Tier 1
191573701002060	Unknown	Non-TSA	Tier 1
191712906004044	Unknown	Non-TSA	Tier 1
191712906003090	Unknown	Non-TSA	Tier 1
190959602002025	Unknown	Non-TSA	Tier 1
190119607002001	Unknown	Non-TSA	Tier 1
190959602002039	Unknown	Non-TSA	Tier 1
190959602002010	Unknown	Non-TSA	Tier 1
190119606002015	Unknown	Non-TSA	Tier 1
191573701002055	Unknown	Non-TSA	Tier 1
190959602002036	Unknown	Non-TSA	Tier 1
190959601003060	Unknown	Non-TSA	Tier 1
190959602002020	Unknown	Non-TSA	Tier 1
190959602004150	Unknown	Non-TSA	Tier 1
190119606003109	Unknown	Non-TSA	Tier 1
191573701002003	Unknown	Non-TSA	Tier 1
190119606003120	Unknown	Non-TSA	Tier 1
191712906003013	Unknown	Non-TSA	Tier 1
190959602004021	Unknown	Non-TSA	Tier 1
190119606003105	Unknown	Non-TSA	Tier 1
191712906003071	Unknown	Non-TSA	Tier 1
190119606002013	Unknown	Non-TSA	Tier 1
190959602002000	Unknown	Non-TSA	Tier 1
190959602002019	Unknown	Non-TSA	Tier 1
190959601003058	Unknown	Non-TSA	Tier 1
190119606002016	Unknown	Non-TSA	Tier 1
191712906003085	Unknown	Non-TSA	Tier 1
190119607002006	Unknown	Non-TSA	Tier 1
190959602002021	Unknown	Non-TSA	Tier 1
190959602004145	Unknown	Non-TSA	Tier 1
190959602002022	Unknown	Non-TSA	Tier 1



**APPENDIX C**  
**THIRD-PARTY AFFIRMATIONS AND SUPPLEMENTAL EVIDENCE**

July 28, 2021

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

Cooperative Telephone Company      **OCIO did not receive a response from this provider.**  
Scott Schabacker  
cooptel@netins.net

To whom it may concern:

This is a letter of inquiry concerning your firm's prior reporting to the State of Iowa Office of the Chief Information Officer ("OCIO" or "Office") regarding the availability of Broadband service in certain United States Census Block(s) within Iowa. Our Office received a formal notice of appeal challenging information reported on the Broadband Availability Map Version 4 ("V4") of the Statewide Broadband Availability Map ("Map"). The data reflected on V4 of the Map was either (1) provided by you to the Office's contractor ("Connected Nation") during the data collection window of April 15 through April 30, 2021, (2) gathered from other sources (such as FCC) that collected data from you, or (3) carried forward from prior reporting made to this Office by you under a previous Map version. Map V4 categorizes census blocks according to the facilitated speed offered within the block. The publication of V4 triggered a formal appeal window, as explained in more detail below, during which time we received this appeal. The appeal we received claims that the data reflected on V4 of the Map is inaccurate. This appeal can be found at <https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process> (see Docket Numbers 21-1031). **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.<sup>1</sup> 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 Iowa<sup>2</sup> and on informal comments/feedback supplied by interested parties as part of the informal comment/feedback process described above and in which your firm may have participated. V4 of the Map, and a detailed background of the same, can be found at: <https://ocio.iowa.gov/broadband-availability-map-version-4>. Overall, the new map reflects Targeted Service Areas defined as a census block within which no communications service provider offers or facilitates broadband service at or above the tier 1, tier 2, or tier 3 download and upload speeds. The tier speeds are defined as follows:

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

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<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>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

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<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](mailto: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](https://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

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

Keystone Farmers Cooperative Telephone Company  
Kris Scheetz  
kris.scheetz@vantagepnt.com

To whom it may concern:

This is a letter of inquiry concerning your firm's prior reporting to the State of Iowa Office of the Chief Information Officer ("OCIO" or "Office") regarding the availability of Broadband service in certain United States Census Block(s) within Iowa. Our Office received a formal notice of appeal challenging information reported on the Broadband Availability Map Version 4 ("V4") of the Statewide Broadband Availability Map ("Map"). The data reflected on V4 of the Map was either (1) provided by you to the Office's contractor ("Connected Nation") during the data collection window of April 15 through April 30, 2021, (2) gathered from other sources (such as FCC) that collected data from you, or (3) carried forward from prior reporting made to this Office by you under a previous Map version. Map V4 categorizes census blocks according to the facilitated speed offered within the block. The publication of V4 triggered a formal appeal window, as explained in more detail below, during which time we received this appeal. The appeal we received claims that the data reflected on V4 of the Map is inaccurate. This appeal can be found at <https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process> (see Docket Numbers 21-1031). **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.<sup>1</sup> 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 Iowa<sup>2</sup> and on informal comments/feedback supplied by interested parties as part of the informal comment/feedback process described above and in which your firm may have participated. V4 of the Map, and a detailed background of the same, can be found at: <https://ocio.iowa.gov/broadband-availability-map-version-4>. Overall, the new map reflects Targeted Service Areas defined as a census block within which no communications service provider offers or facilitates broadband service at or above the tier 1, tier 2, or tier 3 download and upload speeds. The tier speeds are defined as follows:

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

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<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>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.

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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

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<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).

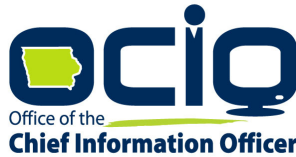
Please return the completed form and any supporting evidence or information to [ociogrants@iowa.gov](mailto:ociogrants@iowa.gov).

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](https://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	Keystone Farmers Coop Telephone Company
Address	86 Main St
City	Keystone
State	Iowa
Zip	52249

**B. DESIGNATED CONTACT INFORMATION**

Contact Name	Byran Kimm
Contact Phone Number	319-442-3241
Contact Email	<a href="mailto:keystone@netins.net">keystone@netins.net</a>

**C. AFFIRMATION**

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

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

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

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

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

The listed census blocks are all census blocks that are split by our study area boundary. We serve all of the locations within our study area boundary with FTTH with an available speed of 150mbps/100 mbps.

**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:	Byran Kimm
Title:	General Manager
Date:	8/2/2021

\*PLEASE READ BEFORE SIGNING: By signing and submitting this form, I, on my own behalf or as a representative of the company identified above, as applicable, expressly represent that I am authorized to make the above factual representation on behalf of said company and/or myself, as applicable, and under penalty of perjury as authorized by Iowa Code section 622.1 and pursuant to the laws of the state of Iowa, certify the following with respect to this form submitted on behalf of said company and/or myself: any statements, representations, warranties, certifications, or attestations made in this form, including any attachments or enclosures associated therewith, are true and accurate; I, on behalf of said company and/or myself, have not knowingly made any false statements or representations in this form. In addition to any criminal penalties authorized by Iowa Code section 720.2 that may result from any false statements of material fact made herein or any other remedies available at law, equity, or otherwise, if it is subsequently determined that I have made a statement, representation, warranty, certification, or attestation in this form, or any attachments or enclosures associated herewith, that is later proven untrue in any material respect, the company on which I submitted this form on behalf of may be disqualified from current incentive programs administered by the Office or may be ordered to repay the Office the entire amount of any funds previously distributed by the Office to said company in connection with any current incentive programs administered by the Office. OCIO makes no guarantees as to whether the information supplied by you will result in any change to the Broadband Availability Map V4 or the way any incentive decisions are reviewed, scored, or decided. This form, as completed, any attachments hereto, and any other information or materials submitted to the Office in connection with this form or related inquiry, shall be considered public records and shall be made available for public examination and/or disseminated upon request by third parties as required by Iowa Code chapter 22. The Office reserves the right to reject this form and relatedly consider any information communicated through this form as neither credible nor probative if this form is not fully and properly filled out.



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

**Facilitate**

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

CENSUS BLOCK ID	Do you Facilitate service to more than 10% of the geographic area of the Census Block?	Download Speed	Upload Speed	
190119606002006	Yes	150 mbps	100 mbps	Split Census Block
190119606002007	Yes	150 mbps	100 mbps	Split Census Block
190119606002008	Yes	150 mbps	100 mbps	Split Census Block
190119606003105	Yes	150 mbps	100 mbps	Split Census Block
190119606003106	Yes	150 mbps	100 mbps	Split Census Block
190119606003109	Yes	150 mbps	100 mbps	Split Census Block
190119606003110	Yes	150 mbps	100 mbps	Split Census Block
190119606003111	Yes	150 mbps	100 mbps	Split Census Block
190119606003118	Yes	150 mbps	100 mbps	Split Census Block
190119606003120	Yes	150 mbps	100 mbps	Split Census Block
191712906004044	Yes	150 mbps	100 mbps	Split Census Block
191712906004081	Yes	150 mbps	100 mbps	Split Census Block
191712906004142	Yes	150 mbps	100 mbps	Split Census Block

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

LTD Broadband LLC  
Corey Hauer  
coreyhauer@gmail.com

To whom it may concern:

This is a letter of inquiry concerning your firm's prior reporting to the State of Iowa Office of the Chief Information Officer ("OCIO" or "Office") regarding the availability of Broadband service in certain United States Census Block(s) within Iowa. Our Office received a formal notice of appeal challenging information reported on the Broadband Availability Map Version 4 ("V4") of the Statewide Broadband Availability Map ("Map"). The data reflected on V4 of the Map was either (1) provided by you to the Office's contractor ("Connected Nation") during the data collection window of April 15 through April 30, 2021, (2) gathered from other sources (such as FCC) that collected data from you, or (3) carried forward from prior reporting made to this Office by you under a previous Map version. Map V4 categorizes census blocks according to the facilitated speed offered within the block. The publication of V4 triggered a formal appeal window, as explained in more detail below, during which time we received this appeal. The appeal we received claims that the data reflected on V4 of the Map is inaccurate. This appeal can be found at <https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process> (see Docket Numbers 21-1011, 21-1031, 21-1032, 21-1033). **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.<sup>1</sup> 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 Iowa<sup>2</sup> and on informal comments/feedback supplied by interested parties as part of the informal comment/feedback process described above and in which your firm may have participated. V4 of the Map, and a detailed background of the same, can be found at: <https://ocio.iowa.gov/broadband-availability-map-version-4>. Overall, the new map reflects Targeted Service Areas defined as a census block within which no communications service provider offers or facilitates broadband service at or above the tier 1, tier 2, or tier 3 download and upload speeds. The tier speeds are defined as follows:

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<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>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

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<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).

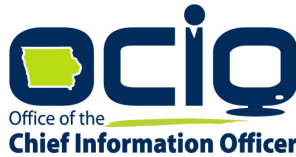
Please return the completed form and any supporting evidence or information to [ociogrants@iowa.gov](mailto:ociogrants@iowa.gov).

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](https://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	LTD Broadband LLC
Address	69 Teahouse Street
City	Las Vegas
State	NV
Zip	89138

**B. DESIGNATED CONTACT INFORMATION**

Contact Name	Corey Hauer
Contact Phone Number	(507) 318-0143
Contact Email	<a href="mailto:coreyhauer@ltdbroadband.com">coreyhauer@ltdbroadband.com</a>

**C. AFFIRMATION**

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

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

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

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

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

LTD Broadband is capable of more than 250/250 in most of our network. This is for dedicated commercial plans. Speeds of 1000/1000 are available to most locations but it is not uniformly available. Our 250/250 plans are uniformly available to at least 10% of every census block we report.

**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:	
Title:	CEO
Date:	8/1/2021

\*PLEASE READ BEFORE SIGNING: By signing and submitting this form, I, on my own behalf or as a representative of the company identified above, as applicable, expressly represent that I am authorized to make the above factual representation on behalf of said company and/or myself, as applicable, and under penalty of perjury as authorized by Iowa Code section 622.1 and pursuant to the laws of the state of Iowa, certify the following with respect to this form submitted on behalf of said company and/or myself: any statements, representations, warranties, certifications, or attestations made in this form, including any attachments or enclosures associated therewith, are true and accurate; I, on behalf of said company and/or myself, have not knowingly made any false statements or representations in this form. In addition to any criminal penalties authorized by Iowa Code section 720.2 that may result from any false statements of material fact made herein or any other remedies available at law, equity, or otherwise, if it is subsequently determined that I have made a statement, representation, warranty, certification, or attestation in this form, or any attachments or enclosures associated herewith, that is later proven untrue in any material respect, the company on which I submitted this form on behalf of may be disqualified from current incentive programs administered by the Office or may be ordered to repay the Office the entire amount of any funds previously distributed by the Office to said company in connection with any current incentive programs administered by the Office. OCIO makes no guarantees as to whether the information supplied by you will result in any change to the Broadband Availability Map V4 or the way any incentive decisions are reviewed, scored, or decided. This form, as completed, any attachments hereto, and any other information or materials submitted to the Office in connection with this form or related inquiry, shall be considered public records and shall be made available for public examination and/or disseminated upon request by third parties as required by Iowa Code chapter 22. The Office reserves the right to reject this form and relatedly consider any information communicated through this form as neither credible nor probative if this form is not fully and properly filled out.

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

**Facilitate**

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

CENSUS BLOCK ID	Do you Facilitate service to more than 10% of the geographic area of the Census Block?	Download Speed	Upload Speed
190693601001144	Yes	250 Mbps	250 Mbps
190693601001145	Yes	250 Mbps	250 Mbps
190693601001168	Yes	250 Mbps	250 Mbps
190693601001169	Yes	250 Mbps	250 Mbps
190693601001171	Yes	250 Mbps	250 Mbps
190693601001172	Yes	250 Mbps	250 Mbps
190693601001174	Yes	250 Mbps	250 Mbps
190693601002002	Yes	250 Mbps	250 Mbps
190693601002007	Yes	250 Mbps	250 Mbps
190693601002009	Yes	250 Mbps	250 Mbps
190693601002010	Yes	250 Mbps	250 Mbps
190693601002013	Yes	250 Mbps	250 Mbps
190693601002014	Yes	250 Mbps	250 Mbps

190693601002016	Yes	250 Mbps	250 Mbps
190693601002017	Yes	250 Mbps	250 Mbps
190693601002022	Yes	250 Mbps	250 Mbps
190693601002025	Yes	250 Mbps	250 Mbps
190693601002031	Yes	250 Mbps	250 Mbps
190693601002034	Yes	250 Mbps	250 Mbps
190693601002036	Yes	250 Mbps	250 Mbps
190693601002038	Yes	250 Mbps	250 Mbps
190693601002039	Yes	250 Mbps	250 Mbps
190693601002053	Yes	250 Mbps	250 Mbps
190693601002054	Yes	250 Mbps	250 Mbps
190693601002068	Yes	250 Mbps	250 Mbps
190693601002071	Yes	250 Mbps	250 Mbps
190693601002072	Yes	250 Mbps	250 Mbps
190693601002073	Yes	250 Mbps	250 Mbps
190693601002074	Yes	250 Mbps	250 Mbps
190693601002076	Yes	250 Mbps	250 Mbps
190693601002079	Yes	250 Mbps	250 Mbps
190693601002080	Yes	250 Mbps	250 Mbps
190693601002082	Yes	250 Mbps	250 Mbps
190693601002084	Yes	250 Mbps	250 Mbps
190693601002088	Yes	250 Mbps	250 Mbps
190693601002096	Yes	250 Mbps	250 Mbps
190693601002097	Yes	250 Mbps	250 Mbps
190693601002098	Yes	250 Mbps	250 Mbps
190693601002099	Yes	250 Mbps	250 Mbps
190693601002110	Yes	250 Mbps	250 Mbps
190693601002112	Yes	250 Mbps	250 Mbps
190693601002116	Yes	250 Mbps	250 Mbps
190693601002118	Yes	250 Mbps	250 Mbps
190693601002119	Yes	250 Mbps	250 Mbps
190693601002122	Yes	250 Mbps	250 Mbps
190693601002124	Yes	250 Mbps	250 Mbps
190693601002127	Yes	250 Mbps	250 Mbps
190693601002128	Yes	250 Mbps	250 Mbps
190693601002131	Yes	250 Mbps	250 Mbps

190693601002138	Yes	250 Mbps	250 Mbps
190693601002139	Yes	250 Mbps	250 Mbps
190693601002140	Yes	250 Mbps	250 Mbps
190693601002142	Yes	250 Mbps	250 Mbps
190693601002144	Yes	250 Mbps	250 Mbps
190693601002151	Yes	250 Mbps	250 Mbps
190693601002153	Yes	250 Mbps	250 Mbps
190693601002159	Yes	250 Mbps	250 Mbps
190693601003017	Yes	250 Mbps	250 Mbps
190693601003018	Yes	250 Mbps	250 Mbps
190693601003019	Yes	250 Mbps	250 Mbps
190693601003020	Yes	250 Mbps	250 Mbps
190693601003024	Yes	250 Mbps	250 Mbps
190693601003026	Yes	250 Mbps	250 Mbps
190693601003028	Yes	250 Mbps	250 Mbps
190693601003030	Yes	250 Mbps	250 Mbps
190693601003033	Yes	250 Mbps	250 Mbps
190693601003292	Yes	250 Mbps	250 Mbps
190693601003293	Yes	250 Mbps	250 Mbps
190693602001086	Yes	250 Mbps	250 Mbps
190693602001092	Yes	250 Mbps	250 Mbps
190119606002006	Yes	250 Mbps	250 Mbps
190119606002007	Yes	250 Mbps	250 Mbps
190119606002008	Yes	250 Mbps	250 Mbps
190119606002009	Yes	250 Mbps	250 Mbps
190119606002012	Yes	250 Mbps	250 Mbps
190119606002014	Yes	250 Mbps	250 Mbps
190119606002015	Yes	250 Mbps	250 Mbps
190119606002016	Yes	250 Mbps	250 Mbps
190119606002017	Yes	250 Mbps	250 Mbps
190119606002018	Yes	250 Mbps	250 Mbps
190119606002020	Yes	250 Mbps	250 Mbps
190119606002029	Yes	250 Mbps	250 Mbps
190119606002032	Yes	250 Mbps	250 Mbps
190119606002039	Yes	250 Mbps	250 Mbps
190119606002084	Yes	250 Mbps	250 Mbps



190119606002085	<b>Yes</b>	250 Mbps	250 Mbps
190119606003105	<b>Yes</b>	250 Mbps	250 Mbps
190119606003106	<b>Yes</b>	250 Mbps	250 Mbps
190119606003110	<b>Yes</b>	250 Mbps	250 Mbps
190119606003111	<b>Yes</b>	250 Mbps	250 Mbps
190119606003112	<b>Yes</b>	250 Mbps	250 Mbps
190119606003114	<b>Yes</b>	250 Mbps	250 Mbps
190119606003115	<b>Yes</b>	250 Mbps	250 Mbps
190119606003117	<b>Yes</b>	250 Mbps	250 Mbps
190119606003118	<b>Yes</b>	250 Mbps	250 Mbps
190119606003120	<b>Yes</b>	250 Mbps	250 Mbps
190119607001000	<b>Yes</b>	250 Mbps	250 Mbps
190119607001001	<b>Yes</b>	250 Mbps	250 Mbps
190119607001002	<b>Yes</b>	250 Mbps	250 Mbps
190119607001003	<b>Yes</b>	250 Mbps	250 Mbps
190119607002000	<b>Yes</b>	250 Mbps	250 Mbps
190119607002001	<b>Yes</b>	250 Mbps	250 Mbps
190119607002002	<b>Yes</b>	250 Mbps	250 Mbps
190119607002006	<b>Yes</b>	250 Mbps	250 Mbps
190119607002007	<b>Yes</b>	250 Mbps	250 Mbps
190119607002009	<b>Yes</b>	250 Mbps	250 Mbps
191712906003001	<b>Yes</b>	250 Mbps	250 Mbps
191712906003002	<b>Yes</b>	250 Mbps	250 Mbps
191712906003011	<b>Yes</b>	250 Mbps	250 Mbps
191712906003013	<b>Yes</b>	250 Mbps	250 Mbps
191712906003018	<b>Yes</b>	250 Mbps	250 Mbps
191712906003020	<b>Yes</b>	250 Mbps	250 Mbps
191712906003021	<b>Yes</b>	250 Mbps	250 Mbps
191712906003031	<b>Yes</b>	250 Mbps	250 Mbps
191712906003067	<b>Yes</b>	250 Mbps	250 Mbps
191712906003071	<b>Yes</b>	250 Mbps	250 Mbps
191712906003072	<b>Yes</b>	250 Mbps	250 Mbps
191712906003085	<b>Yes</b>	250 Mbps	250 Mbps
191712906003086	<b>Yes</b>	250 Mbps	250 Mbps
191712906003088	<b>Yes</b>	250 Mbps	250 Mbps
191712906003089	<b>Yes</b>	250 Mbps	250 Mbps

191712906003090	Yes	250 Mbps	250 Mbps
191712906004080	Yes	250 Mbps	250 Mbps
191712906004081	Yes	250 Mbps	250 Mbps
191712906004142	Yes	250 Mbps	250 Mbps
191130102001014	Yes	250 Mbps	250 Mbps
191130102001026	Yes	250 Mbps	250 Mbps
191130102001027	Yes	250 Mbps	250 Mbps
191130102001040	Yes	250 Mbps	250 Mbps
190199506002169	Yes	250 Mbps	250 Mbps
190199506002172	Yes	250 Mbps	250 Mbps
190199506002173	Yes	250 Mbps	250 Mbps
190199506002174	Yes	250 Mbps	250 Mbps
190199506002175	Yes	250 Mbps	250 Mbps
190199506002203	Yes	250 Mbps	250 Mbps
191130102001001	Yes	250 Mbps	250 Mbps
191130102001002	Yes	250 Mbps	250 Mbps
191130102001006	Yes	250 Mbps	250 Mbps
191130102001007	Yes	250 Mbps	250 Mbps
191130102001008	Yes	250 Mbps	250 Mbps
191130102001010	Yes	250 Mbps	250 Mbps
191130102001012	Yes	250 Mbps	250 Mbps
191130102001041	Yes	250 Mbps	250 Mbps
191130102001044	Yes	250 Mbps	250 Mbps
191130102001046	Yes	250 Mbps	250 Mbps
191130102001048	Yes	250 Mbps	250 Mbps
191130102001049	Yes	250 Mbps	250 Mbps
191130102001050	Yes	250 Mbps	250 Mbps
191130102001051	Yes	250 Mbps	250 Mbps
191130102001052	Yes	250 Mbps	250 Mbps
191130102001058	Yes	250 Mbps	250 Mbps
191130102001062	Yes	250 Mbps	250 Mbps
191130102001063	Yes	250 Mbps	250 Mbps
191130102001071	Yes	250 Mbps	250 Mbps
191130102001072	Yes	250 Mbps	250 Mbps
191130102001075	Yes	250 Mbps	250 Mbps
191130102001080	Yes	250 Mbps	250 Mbps

191130102001088	<b>Yes</b>	250 Mbps	250 Mbps
190199506002019	<b>Yes</b>	250 Mbps	250 Mbps
190199506002056	<b>Yes</b>	250 Mbps	250 Mbps
190199506002060	<b>Yes</b>	250 Mbps	250 Mbps
190199506002094	<b>Yes</b>	250 Mbps	250 Mbps
190199506002095	<b>Yes</b>	250 Mbps	250 Mbps
190199506002106	<b>Yes</b>	250 Mbps	250 Mbps
190199506002110	<b>Yes</b>	250 Mbps	250 Mbps

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 <https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process> (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.<sup>1</sup> 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 Iowa<sup>2</sup> and on informal comments/feedback supplied by interested parties as part of the informal comment/feedback process described above and in which your firm may have participated. V4 of the Map, and a detailed background of the same, can be found at: <https://ocio.iowa.gov/broadband-availability-map-version-4>. Overall, the new map reflects Targeted Service Areas defined as a census block within which no communications service provider offers or facilitates broadband service at or above the tier 1, tier 2, or tier 3 download and upload speeds. The tier speeds are defined as follows:

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<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>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

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<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](mailto: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](https://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	10918

### B. DESIGNATED CONTACT INFORMATION

Contact Name	Thomas Larsen
Contact Phone Number	845-443-2754
Contact Email	<a href="mailto:tlarsen@mediacomcc.com">tlarsen@mediacomcc.com</a>

### C. AFFIRMATION

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

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


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

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

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

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:	
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 Iowa Code section 622.1 and pursuant to the laws of the state of Iowa, certify the following with respect to this form submitted on behalf of said company and/or myself: any statements, representations, warranties, certifications, or attestations made in this form, including any attachments or enclosures associated therewith, are true and accurate; I, on behalf of said company and/or myself, have not knowingly made any false statements or representations in this form. In addition to any criminal penalties authorized by Iowa Code section 720.2 that may result from any false statements of material fact made herein or any other remedies available at law, equity, or otherwise, if it is subsequently determined that I have made a statement, representation, warranty, certification, or attestation in this form, or any attachments or enclosures associated herewith, that is later proven untrue in any material respect, the company on which I submitted this form on behalf of may be disqualified from current incentive programs administered by the Office or may be ordered to repay the Office the entire amount of any funds previously distributed by the Office to said company in connection with any current incentive programs administered by the Office. OCIO makes no guarantees as to whether the information supplied by you will result in any change to the Broadband Availability Map V4 or the way any incentive decisions are reviewed, scored, or decided. This form, as completed, any attachments hereto, and any other information or materials submitted to the Office in connection with this form or related inquiry, shall be considered public records and shall be made available for public examination and/or disseminated upon request by third parties as required by Iowa Code chapter 22. The Office reserves the right to reject this form and relatedly consider any information communicated through this form as neither credible nor probative if this form is not fully and properly filled out.

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

**Facilitate**

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

CENSUS BLOCK ID	Do you Facilitate service to more than 10% of the geographic area of the Census Block?	Download Speed	Upload Speed
190019603004073	Correct	1000	50
190019603004074	In Error	N/A	N/A
190019603004083	In Error	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	Correct	1000	50
190059603001004	Correct	1000	50
190059603001005	Correct	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
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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	<b>Yes</b>	1000	50
191070801001039	<b>Yes</b>	1000	50
191070801001040	<b>Yes</b>	1000	50
191070801001041	<b>Yes</b>	1000	50
191070801001042	<b>Yes</b>	1000	50
191070801001043	<b>In Error</b>	N/A	N/A
191070801001044	<b>Correct</b>	1000	50
191070801001045	<b>Correct</b>	1000	50
191070801001046	<b>Correct</b>	1000	50
191070801001047	<b>Correct</b>	1000	50
191070801001048	<b>Correct</b>	1000	50
191070801001049	<b>Correct</b>	1000	50
191070801001050	<b>Correct</b>	1000	50
191070801001051	<b>In Error</b>	N/A	N/A
191070801001053	<b>Correct</b>	1000	50
191070801001054	<b>Correct</b>	1000	50
191070801001055	<b>Correct</b>	1000	50
191070801001056	<b>Correct</b>	1000	50
191070801001057	<b>Correct</b>	1000	50
191070801001058	<b>Correct</b>	1000	50
191070801001059	<b>Correct</b>	1000	50
191070801001060	<b>Correct</b>	1000	50
191070801001061	<b>In Error</b>	N/A	N/A
191070801001062	<b>Correct</b>	1000	50
191070801001063	<b>In Error</b>	N/A	N/A
191070801001064	<b>Correct</b>	1000	50
191839605001168	<b>In Error</b>	N/A	N/A
191839605001169	<b>In Error</b>	N/A	N/A
191839605001170	<b>In Error</b>	N/A	N/A

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

Shellsburg Cablevision  
Curt Eldred  
celdred@usacomm.coop

To whom it may concern:

This is a letter of inquiry concerning your firm's prior reporting to the State of Iowa Office of the Chief Information Officer ("OCIO" or "Office") regarding the availability of Broadband service in certain United States Census Block(s) within Iowa. Our Office received a formal notice of appeal challenging information reported on the Broadband Availability Map Version 4 ("V4") of the Statewide Broadband Availability Map ("Map"). The data reflected on V4 of the Map was either (1) provided by you to the Office's contractor ("Connected Nation") during the data collection window of April 15 through April 30, 2021, (2) gathered from other sources (such as FCC) that collected data from you, or (3) carried forward from prior reporting made to this Office by you under a previous Map version. Map V4 categorizes census blocks according to the facilitated speed offered within the block. The publication of V4 triggered a formal appeal window, as explained in more detail below, during which time we received this appeal. The appeal we received claims that the data reflected on V4 of the Map is inaccurate. This appeal can be found at <https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process> (see Docket Numbers 21-1031). **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.<sup>1</sup> 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 Iowa<sup>2</sup> and on informal comments/feedback supplied by interested parties as part of the informal comment/feedback process described above and in which your firm may have participated. V4 of the Map, and a detailed background of the same, can be found at: <https://ocio.iowa.gov/broadband-availability-map-version-4>. Overall, the new map reflects Targeted Service Areas defined as a census block within which no communications service provider offers or facilitates broadband service at or above the tier 1, tier 2, or tier 3 download and upload speeds. The tier speeds are defined as follows:

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

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<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>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

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<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](mailto: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](https://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



Grants, OCIO &lt;ociogrants@iowa.gov&gt;

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## Shellsburg Cablevision V4 Appeal Response

1 message

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**Curt Eldred** <CEldred@usacomm.coop>

Wed, Aug 11, 2021 at 11:44 AM

To: "ociogrants@iowa.gov" <ociogrants@iowa.gov>

Cc: Jody Traut <JTraut@usacomm.coop>, Mitch Kuhn <mkuhn@usacomm.coop>, Lainie Scott <LScott@usacomm.coop>, Chad LeFevere <clefevere@usacomm.coop>

To Whom It May Concern,

Please

1. 190119606002020
  - a. We currently provide 100/100 service to this census block. A customer bill is attached.
2. 190119606002029
  - a. We currently have facilities capable of providing 100/100 service in the census block. We are unaware of any other address in this block. We have attached in image of our fiber optic facilities in the front yard of the address.
3. 190959602004012
  - a. We currently can provide 60/5 service to this census block. A customer bill is attached.
4. 190959602004021
  - a. We currently provide service to this census block. Currently, we are unable to provide "Tier 1"upload service. This may have been previously reported due to an error in our billing system.
5. 190959602004025
  - a. . We currently provide service to this census block. Currently, we are unable to provide "Tier 1" service. This may have been previously reported due to an error in our billing system
6. 190959602004145
  - a. We currently provide service to this census block. Currently, we are unable to provide "Tier 1" service. This may have been previously reported due to an error in our billing system
7. 190959602004147
  - a. We currently do not provide service to this census block. Currently, we are unable to provide "Tier 1" service. This may have been previously reported due to an error in our billing system
8. 190959602004150
  - a. We currently do not provide service to this census block. Currently, we are unable to provide "Tier 1" service. This may have been previously reported due to an error in our billing system

Curtis Eldred

General Manager

USA Communications

Office: (319) 436-2224

Mobile: (319) 981-9257



319-436-2224 | 1-800-248-8007

www.usacomm.coop

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

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**4 attachments****19011960600209 plant.JPG**  
113K**190119606002020 20210701 bill.pdf**  
82K**190959602004012 20210701 bill.pdf**  
92K**Shellsburg Cablevision Response.pdf**  
212K



USA COMMUNICATIONS  
124 MAIN ST SW  
SHELLSBURG IA 52332



Visit us on the web  
usacomm.coop

For All Billing Inquiries, call 319-436-2224

Account Number:

Account Name: July 01, 2021

Bill Date: 15TH OF MONTH

Due Date:

## Account Summary

### Last Month

Balance from last statement	82.35
Payment Received 06/15/2021	82.35
<b>Thank You      Balance</b>	<b>\$0.00</b>

### This Month

Customer Charges	164.70
<b>Current Charges</b>	<b>\$164.70</b>
<b>Total Amount Due</b>	<b>\$164.70</b>

**You saved over \$19.00**  
this month by bundling your services!

\*\*\* DETACH AND RETURN THIS PORTION WITH YOUR PAYMENT \*\*\*

0058 - 454C

USA COMMUNICATIONS  
PO BOX 389  
SHELLSBURG IA 52332



☐ FOR CHANGE OF ADDRESS: Please check here  
and complete form on reverse. Thank you.

**Account Number:**

Bill Date: July 01, 2021

Due Date: 15TH OF MONTH

MAIN NUMBER: 0004540572

1617 75TH ST  
LUZERNE IA 52257-9641

Remit To:  
USA COMMUNICATIONS  
PO BOX 310528  
Des Moines IA 50331-0528



00580000016791000000164707

**\*\*Do Not Pay\*\***  
**Bill Will Be Paid Automatically**  
**By Your Bank**

## LONG DISTANCE DEFINITIONS

### Period

D = Day  
E = Evening  
N = Night  
W = Weekend

MP = Multi Rate Periods  
P = Peak  
O = Off Peak

### Type

CB = Person Call Back  
CP = Calling Plan  
CC = Calling Card  
CL = Collect  
DC = Directory Assistance Call Completion  
DD = Direct Dialed  
DI = International Evenings

EC = International Nights  
OP = Operator Handled  
PF = Pay Phone  
PP = Person to Person  
TF = Toll Free  
TN = Third Number

## NEW BILLING ADDRESS

Address: \_\_\_\_\_

City/State: \_\_\_\_\_ Zipcode: \_\_\_\_\_ - \_\_\_\_\_

Telephone: (\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_

Signature: \_\_\_\_\_



For All Billing Inquiries, call 319-436-2224

Account Number: 0000016791

Account Name: 15TH OF

Due Date: MONTH

Visit our website at [usacomm.coop](http://usacomm.coop)

Page 3 of 4

## EQUIPMENT POLICY UPON DISCONNECT

USA Communications requires a minimum of 7 days advanced notification to terminate services and arrange for the return of all equipment. Failure to return will result in the following charges: Set top box \$179.00; DVR Set top box \$332.00; Router/Gigaspire \$283.00 Modem \$80.00; Power cord \$12.00; Leased Moca \$44.51

Have a safe and happy Fourth of July!  
Our office is closed on Monday, July 5th

## Current Customer Charges for

*Non-Payment of charges noted with an asterisk (\*) may result in disconnection of your local telephone service*

### Customer No

#### Monthly Charges

Service	Qty	Amount	Total
<i>Charges for 07/01/21-07/31/21 - 1 MONTH</i>			
100 MBPS INTERNET S/A			
GIGASPIRE	1	0.00	0.00
CBOL INTERSTATE	1	40.79	40.79
100/100 MBPS INTRASTATE S/A	1	41.56	41.56
PAPERLESS BILL	1	0.00	0.00
100 MBPS INTERNET S/A			
GIGASPIRE	1	0.00	0.00
CBOL	1	16.36	16.36
100/100 MBPS INTRASTATE S/A	1	65.99	65.99
PAPERLESS BILL	1	0.00	0.00

**Subtotal Monthly Charges** **\$164.70**

*The Customer charges shown above are being billed on behalf of USA COMMUNICATIONS 319-436-2224*



For All Billing Inquiries, call 319-436-2224  
Account Number:  
Account Name: 15TH OF MONTH  
Due Date:  
Visit our website at [usacomm.coop](http://usacomm.coop)

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Page 4 of 4

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USA COMMUNICATIONS  
124 MAIN ST SW  
SHELLSBURG IA 52332



Visit us on the web  
usacomm.coop

For All Billing Inquiries, call 800-248-8007

Account Number: July 01, 2021  
Account Name: 15TH OF MONTH  
Bill Date:  
Due Date:

## Account Summary

### Last Month

Balance from last statement	76.14
Payment Received 06/04/2021	76.14
<b>Thank You      Balance</b>	<b>\$0.00</b>

### This Month

Customer Charges	72.05
Telephone Charges	1.00
FEDERAL TAX	0.92
STATE TAX	1.84
LOCAL TAX	0.31
<b>Current Charges</b>	<b>\$76.12</b>
<b>Total Amount Due</b>	<b>\$76.12</b>

**You saved over \$43.00**  
this month by bundling your services!

\*\*\* DETACH AND RETURN THIS PORTION WITH YOUR PAYMENT \*\*\*

0058 - 741C

USA COMMUNICATIONS  
PO BOX 389  
SHELLSBURG IA 52332



☐ FOR CHANGE OF ADDRESS: Please check here  
and complete form on reverse. Thank you.

**Account Number:**

Bill Date: July 01, 2021  
Due Date: 15TH OF MONTH  
MAIN NUMBER: 3196423665

601 W MILLER ST  
MARENGO IA 52301-1054

Remit To:  
USA COMMUNICATIONS  
PO BOX 310528  
Des Moines IA 50331-0528



00580000014492000000076122

Balance Due - Please Remit: \$76.12

Amount  
Enclosed: \$



## LONG DISTANCE DEFINITIONS

### Period

D = Day  
E = Evening  
N = Night  
W = Weekend

MP = Multi Rate Periods  
P = Peak  
O = Off Peak

### Type

CB = Person Call Back  
CP = Calling Plan  
CC = Calling Card  
CL = Collect  
DC = Directory Assistance Call Completion  
DD = Direct Dialed  
DI = International Evenings

EC = International Nights  
OP = Operator Handled  
PF = Pay Phone  
PP = Person to Person  
TF = Toll Free  
TN = Third Number

## NEW BILLING ADDRESS

Address: \_\_\_\_\_

City/State: \_\_\_\_\_ Zipcode: \_\_\_\_\_ - \_\_\_\_\_

Telephone: (\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_

Signature: \_\_\_\_\_

Seq #	Date	Time	Number	Location	Period Type	Min	Charge	Total
1.	06-09	10:52A	319 398-	CEDAR RPD,IA	D DD	6:24	0.00	
						6:24	0.00	0.00
<b>Total BUNDLED 100 LD PLAN</b>								<b>0.00</b>
<b>USA COMMUNICATIONS Subtotal</b>						<b>6:24</b>		<b>0.00</b>
<b>Total USA COMMUNICATIONS Charges</b>								<b>0.00</b>



For All Billing Inquiries, call 800-248-8007  
Account Number:  
Account Name:  
Due Date: 15TH OF MONTH  
Visit our website at [usacomm.coop](http://usacomm.coop)

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Page 4 of 4

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76TH ST

East of driveway  
1691 76TH ST

bl/bl  
1255

N9-7

N10-1

N9-6

7616 17TH AV

bl/wh  
1254

1735 76TH ST

West side of driveway  
bl/bk  
1256

N9-5



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	Shellsburg Cablevision, Inc. dba USA Communications
Address	124 Main Street P.O. Box 389
City	Shellsburg
State	Iowa
Zip	52332

B. DESIGNATED CONTACT INFORMATION

Contact Name	Curtis Eldred
Contact Phone Number	319-436-2224
Contact Email	<a href="mailto:celdred@usacomm.coop">celdred@usacomm.coop</a>

C. AFFIRMATION

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

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


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

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

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

See email and attachments for 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:	
Title:	General Manager
Date:	11-Aug-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 Iowa Code section 622.1 and pursuant to the laws of the state of Iowa, certify the following with respect to this form submitted on behalf of said company and/or myself: any statements, representations, warranties, certifications, or attestations made in this form, including any attachments or enclosures associated therewith, are true and accurate; I, on behalf of said company and/or myself, have not knowingly made any false statements or representations in this form. In addition to any criminal penalties authorized by Iowa Code section 720.2 that may result from any false statements of material fact made herein or any other remedies available at law, equity, or otherwise, if it is subsequently determined that I have made a statement, representation, warranty, certification, or attestation in this form, or any attachments or enclosures associated herewith, that is later proven untrue in any material respect, the company on which I submitted this form on behalf of may be disqualified from current incentive programs administered by the Office or may be ordered to repay the Office the entire amount of any funds previously distributed by the Office to said company in connection with any current incentive programs administered by the Office. OCIO makes no guarantees as to whether the information supplied by you will result in any change to the Broadband Availability Map V4 or the way any incentive decisions are reviewed, scored, or decided. This form, as completed, any attachments hereto, and any other information or materials submitted to the Office in connection with this form or related inquiry, shall be considered public records and shall be made available for public examination and/or disseminated upon request by third parties as required by Iowa Code chapter 22. The Office reserves the right to reject this form and relatedly consider any information communicated through this form as neither credible nor probative if this form is not fully and properly filled out.

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

### Facilitate

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

[illegible]

July 28, 2021

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

South Slope Cooperative Telephone Company  
Brian Hamacher  
brian.hamacher@southslope.com

To whom it may concern:

This is a letter of inquiry concerning your firm's prior reporting to the State of Iowa Office of the Chief Information Officer ("OCIO" or "Office") regarding the availability of Broadband service in certain United States Census Block(s) within Iowa. Our Office received a formal notice of appeal challenging information reported on the Broadband Availability Map Version 4 ("V4") of the Statewide Broadband Availability Map ("Map"). The data reflected on V4 of the Map was either (1) provided by you to the Office's contractor ("Connected Nation") during the data collection window of April 15 through April 30, 2021, (2) gathered from other sources (such as FCC) that collected data from you, or (3) carried forward from prior reporting made to this Office by you under a previous Map version. Map V4 categorizes census blocks according to the facilitated speed offered within the block. The publication of V4 triggered a formal appeal window, as explained in more detail below, during which time we received this appeal. The appeal we received claims that the data reflected on V4 of the Map is inaccurate. This appeal can be found at <https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process> (see Docket Numbers 21-1031). **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.<sup>1</sup> 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 Iowa<sup>2</sup> and on informal comments/feedback supplied by interested parties as part of the informal comment/feedback process described above and in which your firm may have participated. V4 of the Map, and a detailed background of the same, can be found at: <https://ocio.iowa.gov/broadband-availability-map-version-4>. Overall, the new map reflects Targeted Service Areas defined as a census block within which no communications service provider offers or facilitates broadband service at or above the tier 1, tier 2, or tier 3 download and upload speeds. The tier speeds are defined as follows:

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

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<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>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

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<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).

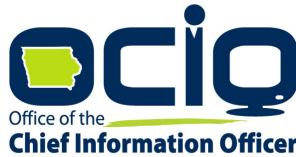
Please return the completed form and any supporting evidence or information to [ociogrants@iowa.gov](mailto:ociogrants@iowa.gov).

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](https://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	South Slope Cooperative Communications
Address	980 North Front St
City	North Liberty
State	IA
Zip	52404

**B. DESIGNATED CONTACT INFORMATION**

Contact Name	Brian Hamacher
Contact Phone Number	319-665-5440
Contact Email	<a href="mailto:brian.hamacher@southslope.com">brian.hamacher@southslope.com</a>

**C. AFFIRMATION**

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

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

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

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

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

The Census Block of 190959601002040 does have FTTH technology available. We offer speeds of 1 Gbps download and 100 Mbps upload to customers in this census block. We have attached an image showing the census block boundary as well as our current facilities within the block. We have staked several of the locations to the west of our current facilities to extend our FTTH network to these homes. However due to the pandemic and supply chain issues we have not been able to start this project. We have spoken with our contractor and we will be starting this build on or around August 23 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:	Charles J. Deisbeck
Title:	CEO
Date:	7/29/2021

\*PLEASE READ BEFORE SIGNING: By signing and submitting this form, I, on my own behalf or as a representative of the company identified above, as applicable, expressly represent that I am authorized to make the above factual representation on behalf of said company and/or myself, as applicable, and under penalty of perjury as authorized by Iowa Code section 622.1 and pursuant to the laws of the state of Iowa, certify the following with respect to this form submitted on behalf of said company and/or myself: any statements, representations, warranties, certifications, or attestations made in this form, including any attachments or enclosures associated therewith, are true and accurate; I, on behalf of said company and/or myself, have not knowingly made any false statements or representations in this form. In addition to any criminal penalties authorized by Iowa Code section 720.2 that may result from any false statements of material fact made herein or any other remedies available at law, equity, or otherwise, if it is subsequently determined that I have made a statement, representation, warranty, certification, or attestation in this form, or any attachments or enclosures associated herewith, that is later proven untrue in any material respect, the company on which I submitted this form on behalf of may be disqualified from current incentive programs administered by the Office or may be ordered to repay the Office the entire amount of any funds previously distributed by the Office to said company in connection with any current incentive programs administered by the Office. OCIO makes no guarantees as to whether the information supplied by you will result in any change to the Broadband Availability Map V4 or the way any incentive decisions are reviewed, scored, or decided. This form, as completed, any attachments hereto, and any other information or materials submitted to the Office in connection with this form or related inquiry, shall be considered public records and shall be made available for public examination and/or disseminated upon request by third parties as required by Iowa Code chapter 22. The Office reserves the right to reject this form and relatedly consider any information communicated through this form as neither credible nor probative if this form is not fully and properly filled out.

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

<b>Facilitate</b>	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.
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<b>Facilitate</b>	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.
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[illegible]

July 28, 2021

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

SpeedNet, LLC      **OCIO did not receive a response from this provider.**  
Shelby Smith  
shelby.smith@speedconnect.net

To whom it may concern:

This is a letter of inquiry concerning your firm's prior reporting to the State of Iowa Office of the Chief Information Officer ("OCIO" or "Office") regarding the availability of Broadband service in certain United States Census Block(s) within Iowa. Our Office received a formal notice of appeal challenging information reported on the Broadband Availability Map Version 4 ("V4") of the Statewide Broadband Availability Map ("Map"). The data reflected on V4 of the Map was either (1) provided by you to the Office's contractor ("Connected Nation") during the data collection window of April 15 through April 30, 2021, (2) gathered from other sources (such as FCC) that collected data from you, or (3) carried forward from prior reporting made to this Office by you under a previous Map version. Map V4 categorizes census blocks according to the facilitated speed offered within the block. The publication of V4 triggered a formal appeal window, as explained in more detail below, during which time we received this appeal. The appeal we received claims that the data reflected on V4 of the Map is inaccurate. This appeal can be found at <https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process> (see Docket Numbers 21-1031, 21-1032, 21-1033). **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.<sup>1</sup> 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 Iowa<sup>2</sup> and on informal comments/feedback supplied by interested parties as part of the informal comment/feedback process described above and in which your firm may have participated. V4 of the Map, and a detailed background of the same, can be found at: <https://ocio.iowa.gov/broadband-availability-map-version-4>. Overall, the new map reflects Targeted Service Areas defined as a census block within which no communications service provider offers or facilitates broadband service at or above the tier 1, tier 2, or tier 3 download and upload speeds. The tier speeds are defined as follows:

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<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>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

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<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](mailto: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](https://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

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

United States Cellular Corporation  
Kathy Hust  
kathy.hust@uscellular.com

To whom it may concern:

This is a letter of inquiry concerning your firm's prior reporting to the State of Iowa Office of the Chief Information Officer ("OCIO" or "Office") regarding the availability of Broadband service in certain United States Census Block(s) within Iowa. Our Office received a formal notice of appeal challenging information reported on the Broadband Availability Map Version 4 ("V4") of the Statewide Broadband Availability Map ("Map"). The data reflected on V4 of the Map was either (1) provided by you to the Office's contractor ("Connected Nation") during the data collection window of April 15 through April 30, 2021, (2) gathered from other sources (such as FCC) that collected data from you, or (3) carried forward from prior reporting made to this Office by you under a previous Map version. Map V4 categorizes census blocks according to the facilitated speed offered within the block. The publication of V4 triggered a formal appeal window, as explained in more detail below, during which time we received this appeal. The appeal we received claims that the data reflected on V4 of the Map is inaccurate. This appeal can be found at <https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process> (see Docket Numbers 21-1021, 21-1030, 21-1031, 21-1032, 21-1033, 21-1034, 21-1037, 21-1038). **To resolve this matter, the Office requests that your firm provide information concerning your service in the affected Census Blocks as further identified and described below by August 11, 2021.**

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

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<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>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

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<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](mailto: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](https://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



Grants, OCIO &lt;ociogrants@iowa.gov&gt;

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## USA Communications - Challenge Form

1 message

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**Shelby Pardy** <shelby.pardy@vantagepnt.com>

Tue, Jul 20, 2021 at 4:16 PM

To: "ociogrants@iowa.gov" &lt;ociogrants@iowa.gov&gt;

Cc: Curt Eldred &lt;CEldred@usacomm.coop&gt;, Eric Rajchel &lt;Eric.Rajchel@vantagepnt.com&gt;, Kristy Szabo &lt;Kristy.Szabo@vantagepnt.com&gt;

Good Afternoon,

On behalf of USA Communications, please find attached the Challenge Form listing the Census Blocks USA Communications is challenging.

Please let me know if you have any questions.

Thanks!

**Shelby Pardy**

*Analyst*

Direct: 605.995.1818

[Shelby.Pardy@Vantagepnt.com](mailto:Shelby.Pardy@Vantagepnt.com)

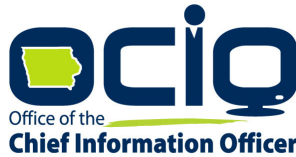


**Mitchell | Portland | Colorado Springs | San Antonio | Sioux Falls | Springfield | Charlotte**

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



**NOFA #006 - USA Communications - Challenge Form .xlsx**  
180K



**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	United States Cellular Corporation
Address	8410 W. Bryn Mawr
City	Chicago
State	Illinois
Zip	60631

**B. DESIGNATED CONTACT INFORMATION**

Contact Name	Thomas Hulings
Contact Phone Number	773-355-3625
Contact Email	<a href="mailto:thomas.hulings@uscellular.com">thomas.hulings@uscellular.com</a>

**C. AFFIRMATION**

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

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

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

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

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

UScellular attests to facilitating service at a minimum of 25/3 Mbps in 31 of the census blocks identified in the OCIO's July 28 letter. These blocks were upgraded to 25/3 Mbps Broadband as part of USCC's NOFA #003 submission and were in service on July 1, 2021. The challengers to these census blocks appear to be unfamiliar with UScellular's service offerings, which is understandable given the recency of these deployments. Some challengers, while not mentioning UScellular, appear to have conflated existing WISP offerings with UScellular's 3GPP 5G FWA product. Such offerings are not comparable in performance, reliability, or scalability.

**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 C. Hulings
Title:	Dir. Business Development & Partnerships
Date:	8/11/2021

\*PLEASE READ BEFORE SIGNING: By signing and submitting this form, I, on my own behalf or as a representative of the company identified above, as applicable, expressly represent that I am authorized to make the above factual representation on behalf of said company and/or myself, as applicable, and under penalty of perjury as authorized by Iowa Code section 622.1 and pursuant to the laws of the state of Iowa, certify the following with respect to this form submitted on behalf of said company and/or myself: any statements, representations, warranties, certifications, or attestations made in this form, including any attachments or enclosures associated therewith, are true and accurate; I, on behalf of said company and/or myself, have not knowingly made any false statements or representations in this form. In addition to any criminal penalties authorized by Iowa Code section 720.2 that may result from any false statements of material fact made herein or any other remedies available at law, equity, or otherwise, if it is subsequently determined that I have made a statement, representation, warranty, certification, or attestation in this form, or any attachments or enclosures associated herewith, that is later proven untrue in any material respect, the company on which I submitted this form on behalf of may be disqualified from current incentive programs administered by the Office or may be ordered to repay the Office the entire amount of any funds previously distributed by the Office to said company in connection with any current incentive programs administered by the Office. OCIO makes no guarantees as to whether the information supplied by you will result in any change to the Broadband Availability Map V4 or the way any incentive decisions are reviewed, scored, or decided. This form, as completed, any attachments hereto, and any other information or materials submitted to the Office in connection with this form or related inquiry, shall be considered public records and shall be made available for public examination and/or disseminated upon request by third parties as required by Iowa Code chapter 22. The Office reserves the right to reject this form and relatedly consider any information communicated through this form as neither credible nor probative if this form is not fully and properly filled out.

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

**Facilitate**

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

CENSUS BLOCK ID	Do you Facilitate service to more than 10% of the geographic area of the Census Block?	Download Speed	Upload Speed
190019602002020	Yes	25	3
190019602002021	Yes	25	3
190019602002022	Yes	25	3
190019602002027	Yes	25	3
190019602002028	Yes	25	3
190019602002029	Yes	25	3
190019602002030	Yes	25	3
190019602002032	Yes	25	3
190019602002035	Yes	25	3
190019602002049	No		
190019602002054	Yes	25	3
190019602002060	Yes	25	3
190019602002067	Yes	25	3

190019602002077	Yes	25	3
190019602002079	Yes	25	3
190019602002083	No		
190019602002109	No		
190019602002210	Yes	25	3
190019602002305	Yes	25	3
190019603004000	No		
190019603004003	No		
190019603004004	Yes	25	3
190019603004005	No		
190019603004007	No		
190019603004014	Yes	25	3
190019603004016	Yes	25	3
190019603004017	No		
190019603004019	No		
190019603004053	No		
190019603004073	No		
190019603004074	No		
190019603004080	No		
190019603004083	No		
190019603004085	Yes	25	3
190019603004087	No		
190019603004089	No		
190019603004110	Yes	25	3
190019603004114	Yes	25	3
190019603004138	Yes	25	3
190019603004164	No		
190019603004174	Yes	25	3
190019603004175	No		
190693601001144	No		
190693601001145	No		
190693601001168	No		
190693601001169	No		
190693601001172	No		
190693601001174	No		
190693601002118	No		

190693601002119	No		
190693601002122	No		
190693601002138	No		
190693601002142	No		
190693601002144	No		
190693601002151	No		
190693601002153	No		
190693601002159	No		
190693601003017	No		
190693601003018	No		
190693601003019	No		
190693601003020	No		
190693601003024	No		
190693601003026	No		
190693601003028	No		
190693601003030	No		
190693601003033	No		
190693601003292	No		
190693601003293	No		
190693602001086	No		
190693602001092	No		
190119606002006	No		
190119606002007	No		
190119606002008	No		
190119606002009	No		
190119606002012	No		
190119606002013	No		
190119606002014	No		
190119606002015	No		
190119606002016	No		
190119606002017	No		
190119606002018	No		
190119606002020	No		
190119606002029	No		
190119606002032	No		
190119606002039	No		

190119606002083	No
190119606002084	No
190119606002085	No
190119606002087	No
190119606003105	No
190119606003106	No
190119606003109	No
190119606003110	No
190119606003111	No
190119606003112	No
190119606003114	No
190119606003115	No
190119606003117	No
190119606003118	No
190119606003120	No
190119607001000	No
190119607001001	No
190119607001002	No
190119607001003	No
190119607002000	No
190119607002001	No
190119607002002	No
190119607002006	No
190119607002007	No
190119607002009	No
190119607003065	No
190959601002040	No
190959601003028	No
190959601003029	No
190959601003030	Yes
190959601003032	No
190959601003033	No
190959601003035	No
190959601003058	No
190959601003060	No
190959602001084	No

25

3

190959602001085	No
190959602001086	No
190959602001087	No
190959602001089	No
190959602001095	No
190959602001096	No
190959602001097	No
190959602001098	No
190959602001099	No
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190959602002016	No
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190959602002019	No
190959602002020	No
190959602002021	No
190959602002022	No
190959602002023	No
190959602002024	No
190959602002025	No
190959602002026	No



190959602002027	No		
190959602002028	No		
190959602002029	No		
190959602002030	No		
190959602002032	No		
190959602002033	No		
190959602002034	No		
190959602002035	No		
190959602002036	No		
190959602002037	No		
190959602002038	No		
190959602002039	No		
190959602002070	No		
190959602002071	No		
190959602002103	No		
190959602002104	No		
190959602003000	No		
190959602003001	No		
190959602003026	No		
190959602003028	No		
190959602004000	Yes	25	3
190959602004001	Yes	25	3
190959602004012	No		
190959602004017	No		
190959602004018	No		
190959602004019	No		
190959602004020	No		
190959602004021	No		
190959602004024	No		
190959602004025	No		
190959602004026	Yes	25	3
190959602004142	No		
190959602004143	No		
190959602004145	No		
190959602004147	No		
190959602004148	No		

190959602004150	No	25	3
190959602004154	No		
190959602004159	Yes		
190959602004160	No		
191573701002000	No		
191573701002001	No		
191573701002002	No		
191573701002003	No		
191573701002004	No		
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191573701002060	No		
191573701002061	No		
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191573701002063	No		
191573701002076	No		
191573701002077	No		
191712906003001	No		
191712906003002	No		
191712906003011	No		
191712906003013	No		
191712906003018	No		
191712906003020	No		
191712906003021	No		
191712906003031	No		
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191712906003071	No		
191712906003072	No		
191712906003082	No		
191712906003085	No		
191712906003086	No		
191712906003088	No		

191712906003089	No
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191712906004080	No
191712906004081	No
191712906004084	No
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191130102001014	No
191130102001016	No
191130102001017	No
191130102001025	No
191130102001026	No
191130102001027	No
191130102001028	No
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191130102001033	No
191130102001034	No
191130102001035	No
191130102001036	No
191130102001038	No
191130102001040	No
190199506002169	No
190199506002172	No
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191130102001001	No
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191130102001008	No
191130102001010	No
191130102001012	No
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191130102001039	No
191130102001041	No

191130102001044	No		
191130102001045	No		
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191130102001048	No		
191130102001049	No		
191130102001050	No		
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191130102001052	No		
191130102001062	No		
191130102001063	No		
191130102001071	No		
191130102001072	No		
191130102001075	No		
191130102001088	No		
190199501001150	No		
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190199506002018	No		
190199506002019	No		
190199506002040	Yes	25	3
190199506002041	No		
190199506002056	No		
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190150206001215	No		
190150206001218	No		
190150206001242	No		
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190150206001250	No		
190150206001251	No		
190150206001252	No		

190150206001253	No
190150206001255	No
190150206001256	No
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190150206001258	No
190150206001259	No
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190150206001284	No
190150206001288	No
190150206001289	No
190150206001290	No
190150206001291	No
190150206001292	No
190150206001293	No
190150206001332	No
190490502002090	No
190490504001025	No
190490504001029	No
190490504001060	No
190490504001061	No
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190490505001051	No		
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190490505001055	Yes	25	3
190490505001057	No		
190490505001058	No		
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190490505001069	No		
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190490505001074	No		
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190490505001076	No		
190490505001077	No		
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190490505001083	No		
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190730801001117	No
190730801001119	No
190730801001120	No
190730801001153	No
190730801001155	No
190730801001159	No
190730801001161	No
190730801001167	No
190490501003038	No
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190490501004035	No
190490501004041	No
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190490502001004	No
190490502001032	No
190490502001035	No
190490502001036	No
190490502001037	No
190490502001038	No
190490502001039	No
190490502001041	No
190490502001042	No
190490502001043	No
190490502001044	No

190490502001045	No
190490502001046	No
190490502001048	No
190490502001051	No
190490502001056	No
190490502001057	No
190490502001060	No
190490502002093	No
190490502002094	No
190490502003000	No
190490505001170	No
190490505001172	No
190490505002001	No
190490505002002	No
190490505002048	No
190490505002049	No
190490505002057	No
190490505002058	No
190490505002063	No
190490505002065	No
190490505002066	No
190490505002070	No
190490505002119	No
190490505002120	No
190490505002128	No
190490507001003	No



July 28, 2021

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

Windstream Communications  
Trent Fellers  
trent.fellers@windstream.com

To whom it may concern:

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

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

<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>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

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<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](mailto: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](https://ocio.iowa.gov/broadband). Iowa Admin. Code r. 129—20.5(3). However, this Office is affirmatively reaching out to notify you of the appeal, of the circumstances surrounding the appeal, and to solicit your feedback and position. If this Office does not receive your response via Exhibit A of the Form by **August 11, 2021** (10 business days from the date of this letter), the Office will make a final decision based on the evidence and information currently available to it. Iowa Admin. Code r. 129—20.5(4), (5).

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

Sincerely,

Office of the Chief Information Officer,  
State of Iowa



**EXHIBIT A**

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

**A. RESPONDENT INFORMATION**

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

**B. DESIGNATED CONTACT INFORMATION**

Contact Name	Logan Shine
Contact Phone Number	515-321-0194
Contact Email	<a href="mailto:logan.shine@windstream.com">logan.shine@windstream.com</a>

**C. AFFIRMATION**

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

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

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

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

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

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

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

\*PLEASE READ BEFORE SIGNING: By signing and submitting this form, I, on my own behalf or as a representative of the company identified above, as applicable, expressly represent that I am authorized to make the above factual representation on behalf of said company and/or myself, as applicable, and under penalty of perjury as authorized by Iowa Code section 622.1 and pursuant to the laws of the state of Iowa, certify the following with respect to this form submitted on behalf of said company and/or myself: any statements, representations, warranties, certifications, or attestations made in this form, including any attachments or enclosures associated therewith, are true and accurate; I, on behalf of said company and/or myself, have not knowingly made any false statements or representations in this form. In addition to any criminal penalties authorized by Iowa Code section 720.2 that may result from any false statements of material fact made herein or any other remedies available at law, equity, or otherwise, if it is subsequently determined that I have made a statement, representation, warranty, certification, or attestation in this form, or any attachments or enclosures associated herewith, that is later proven untrue in any material respect, the company on which I submitted this form on behalf of may be disqualified from current incentive programs administered by the Office or may be ordered to repay the Office the entire amount of any funds previously distributed by the Office to said company in connection with any current incentive programs administered by the Office. OCIO makes no guarantees as to whether the information supplied by you will result in any change to the Broadband Availability Map V4 or the way any incentive decisions are reviewed, scored, or decided. This form, as completed, any attachments hereto, and any other information or materials submitted to the Office in connection with this form or related inquiry, shall be considered public records and shall be made available for public examination and/or disseminated upon request by third parties as required by Iowa Code chapter 22. The Office reserves the right to reject this form and relatedly consider any information communicated through this form as neither credible nor probative if this form is not fully and properly filled out.

[illegible]































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