

FINAL AGENCY DECISION STATEWIDE BROADBAND AVAILABILITY MAP VERSION 4 APPEAL September 14, 2021	
DOCKET NO. 21-1037	
A. APPELLANT INFORMATION	
Company Name	Minburn Telephone Company
Address	416 Chestnut Street
City	Minburn
State	Iowa
Zip	50167
B. DESIGNATED CONTACT INFORMATION	
Contact Name	Debra Lucht
Contact Phone Number	515-438-2200
Contact Email	debl@minburncomm.com
C. APPEAL TYPE	
<input type="checkbox"/>	Resident Challenge
<input type="checkbox"/>	First-Party Provider Challenge
<input checked="" type="checkbox"/>	Third-Party Provider Challenge
D. EVIDENCE CONSIDERED	
<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 checked="" 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 checked="" 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 https://ocio.iowa.gov/broadband-availability-map-version-4-challenge-process for more information regarding how the Office evaluates evidence and decides tier designations for appealed blocks.</p>	
E. TO APPEAL FURTHER	
<p>The Office will post its Final Decisions on its website at ocio.iowa.gov/broadband. If an Appellant wishes to appeal the Decision further Appellant must notify the Office in writing within thirty (30) days of the posting of the Decision. Iowa Admin. Code r. 129–20.5(5). A request for a contested case must be filed by mailing a written request to:</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>	
SIGNED	
DATE	
	Matt Behrens Deputy Chief Information Officer State of Iowa

APPENDIX A - FINAL DECISION

DEFINITIONS

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

Docket No.	Census Block ID	Prior Reporting	Map V4 Designation	Appellant's Request	Final Agency Decision	Decision Basis	Overlapping Appeal
21-1037	190150206001255	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001240	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001239	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001233	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001242	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001212	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001259	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001218	Unknown	Non-TSA	Tier 1	Non-TSA	3	

21-1037	190150206001215	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001249	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001247	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001250	Unknown	Non-TSA	Tier 1	Non-TSA	5	
21-1037	190730801001119	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190730801001120	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190730801001117	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001278	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001258	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001284	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001245	Unknown	Non-TSA	Tier 1	Non-TSA	5	
21-1037	190150206001282	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001294	Unknown	Non-TSA	Tier 1	Non-TSA	5	
21-1037	190150206001241	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001289	Unknown	Non-TSA	Tier 1	Non-TSA	5	
21-1037	190150206001251	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001332	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001293	Unknown	Non-TSA	Tier 1	Non-TSA	5	
21-1037	190150206001281	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001292	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001290	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001256	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001252	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001288	Unknown	Non-TSA	Tier 1	Non-TSA	5	
21-1037	190150206001285	Unknown	Non-TSA	Tier 1	Non-TSA	5	21-006
21-1037	190150206001287	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001257	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001286	Unknown	Non-TSA	Tier 1	Non-TSA	5	21-077, 21-078, 21-079, 21-080, 21-081, 21-082, 21-083, 21-084, 21-085, 21-087
21-1037	190150206001296	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001295	Unknown	Non-TSA	Tier 1	Non-TSA	3	

21-1037	190150206001253	Unknown	Non-TSA	Tier 1	Non-TSA	5	
21-1037	190150206001283	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001280	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001279	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190150206001291	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490502002041	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490505001001	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490505001002	Unknown	Non-TSA	Tier 1	Non-TSA	5	
21-1037	190490505001020	Unknown	Non-TSA	Tier 1	Non-TSA	3	
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21-1037	190490503003007	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490505001009	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490502002039	Unknown	Non-TSA	Tier 1	Non-TSA	5	
21-1037	190490505001006	Unknown	Non-TSA	Tier 1	Non-TSA	5	
21-1037	190490502002016	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490504003004	Unknown	Non-TSA	Tier 1	Non-TSA	3	
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21-1037	190490502002040	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490502002014	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490502002010	Unknown	Non-TSA	Tier 1	Non-TSA	3	
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21-1037	190490502002042	Unknown	Non-TSA	Tier 1	Tier 1	6	
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21-1037	190490505001104	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490505001120	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490505001129	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490505001150	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490505001147	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490505001075	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490504001061	Unknown	Non-TSA	Tier 1	Non-TSA	3	
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21-1037	190490505001116	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490505001168	Unknown	Non-TSA	Tier 1	Non-TSA	5	
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21-1037	190490505001130	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490505001046	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490505001062	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490504001025	Unknown	Non-TSA	Tier 1	Non-TSA	3	
21-1037	190490505001030	Unknown	Non-TSA	Tier 1	Non-TSA	5	
21-1037	190490505001065	Unknown	Non-TSA	Tier 1	Non-TSA	3	

APPENDIX B
CERTIFICATION AND SUPPORTING INFORMATION



Grants, OCIO <ociogrants@iowa.gov>

Minburn Telephone Company - OCIO Challenge Form - Perry Rural Challenge

1 message

Kristy Szabo <Kristy.Szabo@vantagepnt.com>

Tue, Jul 20, 2021 at 4:32 PM

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

Cc: Deb Lucht - Minburn <debl@minburncomm.com>, Shelby Pardy <shelby.pardy@vantagepnt.com>

Good Afternoon,

On behalf of Minburn Telephone Company, please find attached the Challenge Form listing the Census Blocks Minburn Telephone Company is challenging in the Perry Rural area.

Please let me know if you have any questions.

Thanks!

Kristy Szabo*Director of Consulting*

Direct: 605.995.1786

Mobile: 605.770.2960

Kristy.Szabo@Vantagepnt.com**Mitchell | Portland | Colorado Springs | San Antonio | Sioux Falls | Springfield | Charlotte**

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2 attachments**Perry Rural - Challenge Supporting Documentation - Minburn Telephone Company.pdf**

19499K



NOFA #006 - Minburn - Challenge Form-Perry Rural.xlsx

178K



A. APPELLANT INFORMATION	
Company Name	Minburn Telephone Company
Address	416 Chestnut Street
City	Minburn
State	Iowa
Zip	50167
B. DESIGNATED CONTACT INFORMATION	
Contact Name	Debra Lucht
Contact Phone Number	515-438-2200
Contact Email	debl@minburncomm.com
C. CERTIFICATION/ATTESTATION/AFFIRMATION	
In signing and submitting this form, the above-identified company, and its duly authorized representative signing on behalf thereof, hereby affirms, attests, and certifies under penalty of perjury that, as represented in its submission: Choose one option that describes company/affiliation status.	
<p>Company, consistent with the representations made in this form, and regardless of whether your company's prior reporting to 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>Minburn Telephone Company (Minburn) is submitting this challenge for the census blocks reflected herein and also included in its Perry Rural NOFA #006 grant application. The census blocks included in this challenge are reflected as having broadband service offerings at speeds that are deeming the areas as ineligible for grant funding per the OCIO map. However, as reflected in the attached supporting documentation, the speeds being reported by the service providers in these census blocks are overstated by the providers. Based on the due diligence conducted by Minburn's staff, Minburn 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:	Debra Lucht
Title:	CEO/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.

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

CENSUS BLOCK ID	Prior Reporting to FCC or Connected Nation Definitions 1. <u>In Error</u> means data was reported incorrectly to FCC or Connected Nation. 2. <u>Correct</u> means data was reported corectly 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?
190150206001255	Unknown	Non-TSA	Tier 1
190150206001240	Unknown	Non-TSA	Tier 1
190150206001239	Unknown	Non-TSA	Tier 1
190150206001233	Unknown	Non-TSA	Tier 1
190150206001242	Unknown	Non-TSA	Tier 1
190150206001212	Unknown	Non-TSA	Tier 1
190150206001259	Unknown	Non-TSA	Tier 1
190150206001218	Unknown	Non-TSA	Tier 1
190150206001215	Unknown	Non-TSA	Tier 1
190150206001249	Unknown	Non-TSA	Tier 1
190150206001247	Unknown	Non-TSA	Tier 1
190150206001250	Unknown	Non-TSA	Tier 1
190730801001119	Unknown	Non-TSA	Tier 1
190730801001120	Unknown	Non-TSA	Tier 1
190730801001117	Unknown	Non-TSA	Tier 1
190150206001278	Unknown	Non-TSA	Tier 1
190150206001258	Unknown	Non-TSA	Tier 1
190150206001284	Unknown	Non-TSA	Tier 1
190150206001245	Unknown	Non-TSA	Tier 1
190150206001282	Unknown	Non-TSA	Tier 1
190150206001294	Unknown	Non-TSA	Tier 1
190150206001241	Unknown	Non-TSA	Tier 1
190150206001289	Unknown	Non-TSA	Tier 1

190150206001251	Unknown	Non-TSA	Tier 1
190150206001332	Unknown	Non-TSA	Tier 1
190150206001293	Unknown	Non-TSA	Tier 1
190150206001281	Unknown	Non-TSA	Tier 1
190150206001292	Unknown	Non-TSA	Tier 1
190150206001290	Unknown	Non-TSA	Tier 1
190150206001256	Unknown	Non-TSA	Tier 1
190150206001252	Unknown	Non-TSA	Tier 1
190150206001288	Unknown	Non-TSA	Tier 1
190150206001285	Unknown	Non-TSA	Tier 1
190150206001287	Unknown	Non-TSA	Tier 1
190150206001257	Unknown	Non-TSA	Tier 1
190150206001286	Unknown	Non-TSA	Tier 1
190150206001296	Unknown	Non-TSA	Tier 1
190150206001295	Unknown	Non-TSA	Tier 1
190150206001253	Unknown	Non-TSA	Tier 1
190150206001283	Unknown	Non-TSA	Tier 1
190150206001280	Unknown	Non-TSA	Tier 1
190150206001279	Unknown	Non-TSA	Tier 1
190150206001291	Unknown	Non-TSA	Tier 1
190490502002041	Unknown	Non-TSA	Tier 1
190490505001001	Unknown	Non-TSA	Tier 1
190490505001002	Unknown	Non-TSA	Tier 1
190490505001020	Unknown	Non-TSA	Tier 1
190490502002015	Unknown	Non-TSA	Tier 1
190490502002013	Unknown	Non-TSA	Tier 1
190490505001000	Unknown	Non-TSA	Tier 1
190490502002009	Unknown	Non-TSA	Tier 1
190490503003007	Unknown	Non-TSA	Tier 1
190490505001009	Unknown	Non-TSA	Tier 1
190490502002039	Unknown	Non-TSA	Tier 1
190490505001006	Unknown	Non-TSA	Tier 1
190490502002016	Unknown	Non-TSA	Tier 1
190490504003004	Unknown	Non-TSA	Tier 1
190490505001021	Unknown	Non-TSA	Tier 1
190490505001003	Unknown	Non-TSA	Tier 1

190490502002011	Unknown	Non-TSA	Tier 1
190490502002043	Unknown	Non-TSA	Tier 1
190490502002040	Unknown	Non-TSA	Tier 1
190490502002014	Unknown	Non-TSA	Tier 1
190490502002010	Unknown	Non-TSA	Tier 1
190490505001033	Unknown	Non-TSA	Tier 1
190490505001034	Unknown	Non-TSA	Tier 1
190490503003001	Unknown	Non-TSA	Tier 1
190490504003005	Unknown	Non-TSA	Tier 1
190490502002012	Unknown	Non-TSA	Tier 1
190490505001024	Unknown	Non-TSA	Tier 1
190490505001004	Unknown	Non-TSA	Tier 1
190490503001035	Unknown	Non-TSA	Tier 1
190490502002042	Unknown	Non-TSA	Tier 1
190730801001155	Unknown	Non-TSA	Tier 1
190730801001161	Unknown	Non-TSA	Tier 1
190730801001159	Unknown	Non-TSA	Tier 1
190730801001167	Unknown	Non-TSA	Tier 1
190730801001153	Unknown	Non-TSA	Tier 1
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190490505001076	Unknown	Non-TSA	Tier 1
190490505001029	Unknown	Non-TSA	Tier 1
190490505001134	Unknown	Non-TSA	Tier 1
190490505001104	Unknown	Non-TSA	Tier 1
190490505001120	Unknown	Non-TSA	Tier 1
190490505001129	Unknown	Non-TSA	Tier 1
190490505001150	Unknown	Non-TSA	Tier 1
190490505001147	Unknown	Non-TSA	Tier 1
190490505001075	Unknown	Non-TSA	Tier 1
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190490505001059	Unknown	Non-TSA	Tier 1
190490505001027	Unknown	Non-TSA	Tier 1
190490505001049	Unknown	Non-TSA	Tier 1
190490505001028	Unknown	Non-TSA	Tier 1

190490505001077	Unknown	Non-TSA	Tier 1
190490505001074	Unknown	Non-TSA	Tier 1
190490505001145	Unknown	Non-TSA	Tier 1
190490505001054	Unknown	Non-TSA	Tier 1
190490502002044	Unknown	Non-TSA	Tier 1
190490505001113	Unknown	Non-TSA	Tier 1
190490502002050	Unknown	Non-TSA	Tier 1
190490505001135	Unknown	Non-TSA	Tier 1
190490505001121	Unknown	Non-TSA	Tier 1
190490505001069	Unknown	Non-TSA	Tier 1
190490505001116	Unknown	Non-TSA	Tier 1
190490505001168	Unknown	Non-TSA	Tier 1
190490505001127	Unknown	Non-TSA	Tier 1
190490505001079	Unknown	Non-TSA	Tier 1
190490505001118	Unknown	Non-TSA	Tier 1
190490505001078	Unknown	Non-TSA	Tier 1
190490502002048	Unknown	Non-TSA	Tier 1
190490502002081	Unknown	Non-TSA	Tier 1
190490505001146	Unknown	Non-TSA	Tier 1
190490505001073	Unknown	Non-TSA	Tier 1
190490505001128	Unknown	Non-TSA	Tier 1
190490505001149	Unknown	Non-TSA	Tier 1
190490502002047	Unknown	Non-TSA	Tier 1
190490505001115	Unknown	Non-TSA	Tier 1
190490505001071	Unknown	Non-TSA	Tier 1
190490505001148	Unknown	Non-TSA	Tier 1
190490505001047	Unknown	Non-TSA	Tier 1
190490505001122	Unknown	Non-TSA	Tier 1
190490505001114	Unknown	Non-TSA	Tier 1
190490505001031	Unknown	Non-TSA	Tier 1
190490505001119	Unknown	Non-TSA	Tier 1
190490505001099	Unknown	Non-TSA	Tier 1
190490505001169	Unknown	Non-TSA	Tier 1
190490502002049	Unknown	Non-TSA	Tier 1
190490502002046	Unknown	Non-TSA	Tier 1
190490502002090	Unknown	Non-TSA	Tier 1

190490505001055	Unknown	Non-TSA	Tier 1
190490504001060	Unknown	Non-TSA	Tier 1
190490505001052	Unknown	Non-TSA	Tier 1
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190490505001045	Unknown	Non-TSA	Tier 1
190490505001089	Unknown	Non-TSA	Tier 1
190490502002082	Unknown	Non-TSA	Tier 1
190490505001082	Unknown	Non-TSA	Tier 1
190490505001081	Unknown	Non-TSA	Tier 1
190490505001032	Unknown	Non-TSA	Tier 1
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190490505001208	Unknown	Non-TSA	Tier 1
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190490505001058	Unknown	Non-TSA	Tier 1
190490505001060	Unknown	Non-TSA	Tier 1
190490505001053	Unknown	Non-TSA	Tier 1
190490505001110	Unknown	Non-TSA	Tier 1
190490505001112	Unknown	Non-TSA	Tier 1
190490505001130	Unknown	Non-TSA	Tier 1
190490505001046	Unknown	Non-TSA	Tier 1
190490505001062	Unknown	Non-TSA	Tier 1
190490504001025	Unknown	Non-TSA	Tier 1
190490505001030	Unknown	Non-TSA	Tier 1
190490505001065	Unknown	Non-TSA	Tier 1

Minburn Telephone Company

Challenge

Perry Rural

Perry Rural Broadband Expansion

Empower Rural Iowa Broadband
Grants Program

Minburn Telephone Company – OCIO NOFA #006 Census Block Eligibility Challenge
Perry Rural

Minburn Telephone Company (Minburn) respectfully requests to challenge the census blocks included in this filing, which are also included in its NOFA #006 OCIO Broadband Grant, Perry Rural. The identified census blocks are currently being reflected as served on the Broadband Availability Map V4; however, it has been determined through the completion of thorough due diligence by Minburn's staff and supported by consumers in the specified areas that the claimed level of broadband service is widely overstated by the service providers.

Minburn is challenging each of the service providers claiming to provide broadband in the census blocks reflected in this challenge. In addition to Bits of Technology Wireless Internet, Mediacom, CenturyLink and Windstream are also claiming to provide broadband services in the area with each covering less than 5% and 48%, respectively. As reflected in the residential affidavits obtained, the service offered by each provider is not at the speeds being claimed.

The following supporting documentation for this challenge has been broken out into five sections: 1) Dallas County Information; 2) Perry Rural Research; 3) Bits of Technology Wireless Internet Challenge; 4) Residential Affidavits; and 5) Other Supporting Documentation.

Dallas County Information

Information found in this section was provided by HR Green and the Greater Des Moines Partnership. The images depict the results from a May 2021 survey of residents and businesses throughout central Iowa. The survey responses presented here highlight the current gaps in broadband availability, speed/performance, reliability, and affordability in Dallas County.

Perry Rural Research

This section contains information that was provided by CheckPoint Solutions via data collected from Minburn's the crowd sourcing tool. The CheckPoint Solutions platform is used by providers to mine data on current broadband availability such as speed tests of existing connections as well as gathers demand generation of interest. The research offers a graphical representation of the speed tests completed in the challenge area that supports the challenge form.

Bits of Technology Wireless Internet Challenge

This narrative represents an analysis conducted within the past 60 days as to the current service providers, specifically Bits of Technology Wireless Internet (BTWI), and their current marketing and service offering claims. Findings offer technical arguments to explain why BTWIs current offerings are overstated.

Residential Affidavits

The residential affidavits included in this section are signed and notarized by consumers in the challenge area stating broadband service is unable to be provided at the speeds being claimed by the current providers which include, but are not limited to, BTWI, Mediacom, CenturyLink, and Windstream.

To further support our position, Minburn is sharing an unsolicited video recorded by a resident. He posted the video on a community board to encourage and educate his neighbors of the struggles of finding reliable broadband service. The video can be viewed at: <https://youtu.be/D1fVYrWnR0> .

Other Supporting Documentation

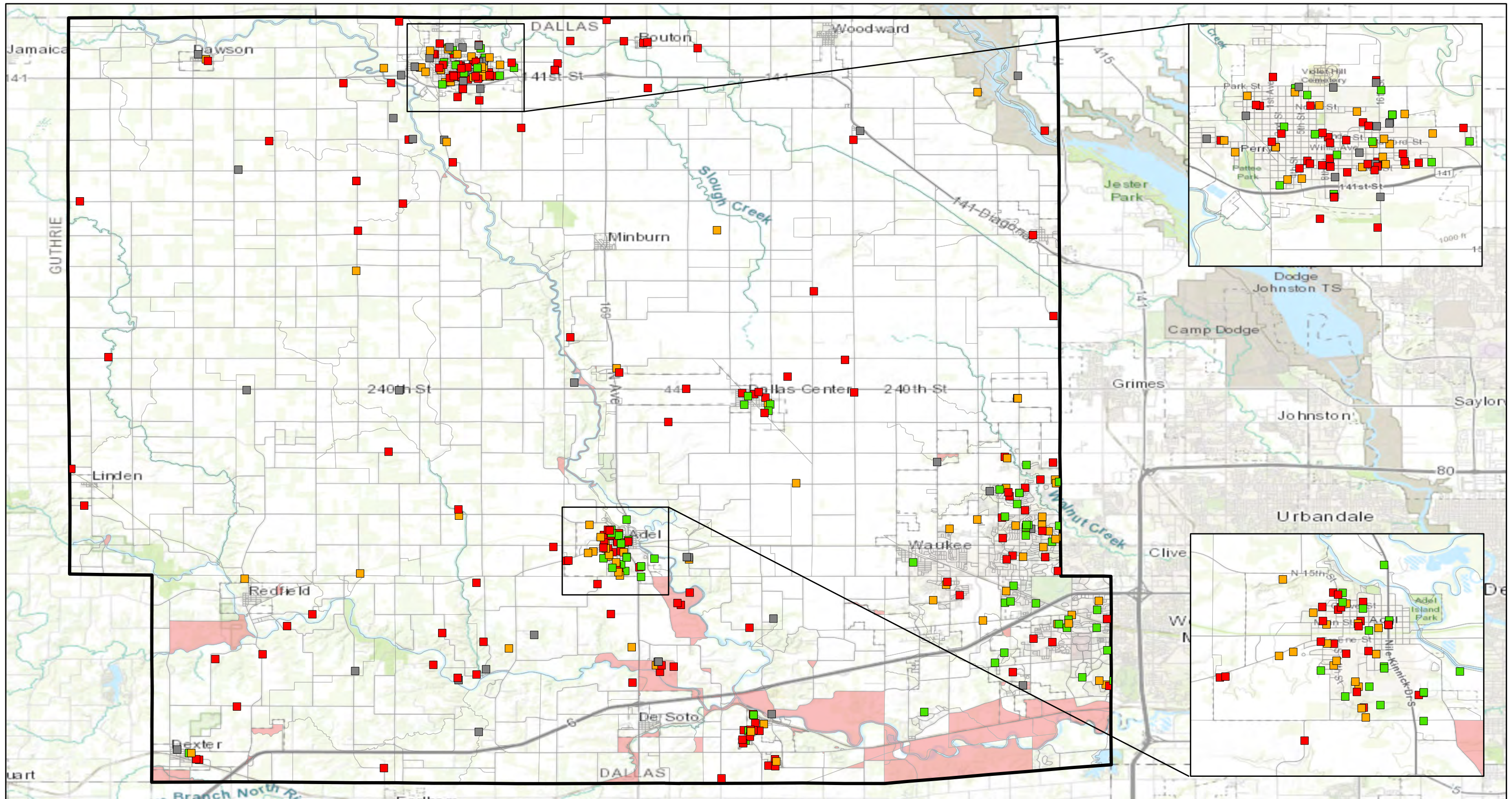
The final supporting documentation contains a direct mail postcard advertisement received by a consumer residing within the challenge area of Perry. The postcard was sent via USPS by Bits of Technology Wireless Internet (BTWI). As shown, the postcard message offers **UP TO 30 Mbps**; however, this speed is significantly less than what BTWI has claimed they are able to deliver per the Broadband Availability Map V4.

Minburn Telephone Company

Challenge – Perry Rural Dallas County Information

Perry Rural Broadband Expansion

Empower Rural Iowa Broadband Grants
Program



Residential Survey Results Internet Download Speed

Dallas County
Iowa

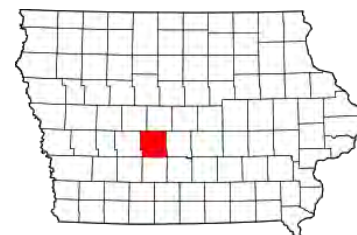
Legend

Internet Download Speed (in Mbps):

- Unserved (<25)
- Underserved (25-100)
- Well-Served (>100)
- No Speed Test Data

Iowa Broadband Availability

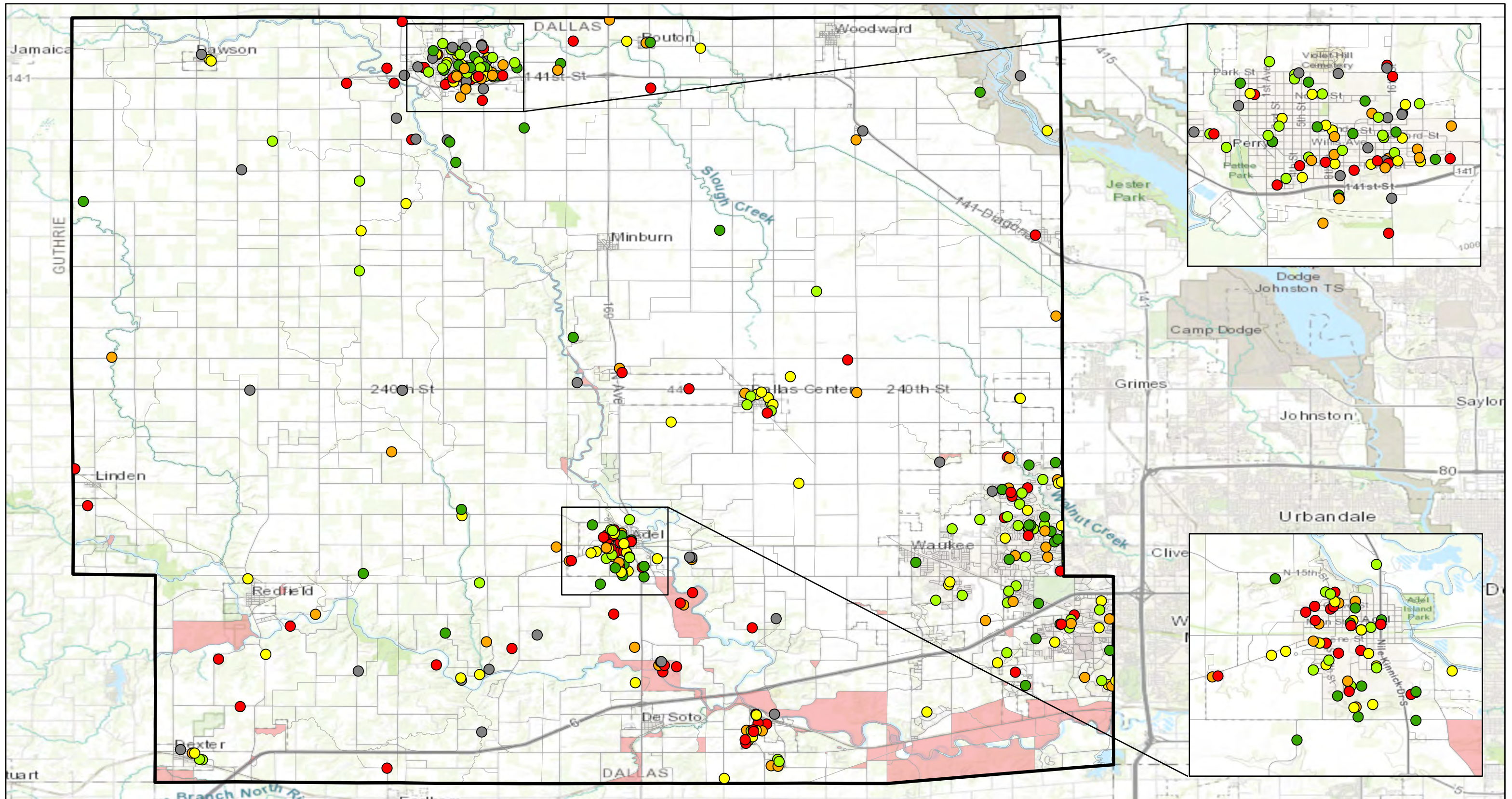
- Targeted Service Area
- Broadband Available



Miles

1 inch equals 3 miles





Residential Survey Results Speed & Data Rate Satisfaction

**Dallas County
Iowa**

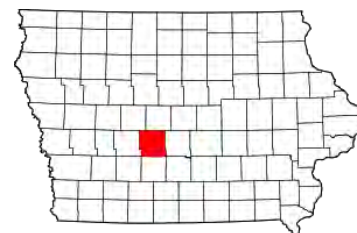
Legend

Speed/Data Rate Satisfaction

- 1-Very Dissatisfied
- 2-Somewhat Dissatisfied
- 3-It's OK
- 4-Somewhat Satisfied
- 5-Very Satisfied
- No Response

Iowa Broadband Availability

- Targeted Service Area
- Broadband Available



Miles

1 inch equals 3 miles



Minburn Telephone Company

Challenge – Perry Rural Perry Rural Research

Perry Rural Broadband Expansion

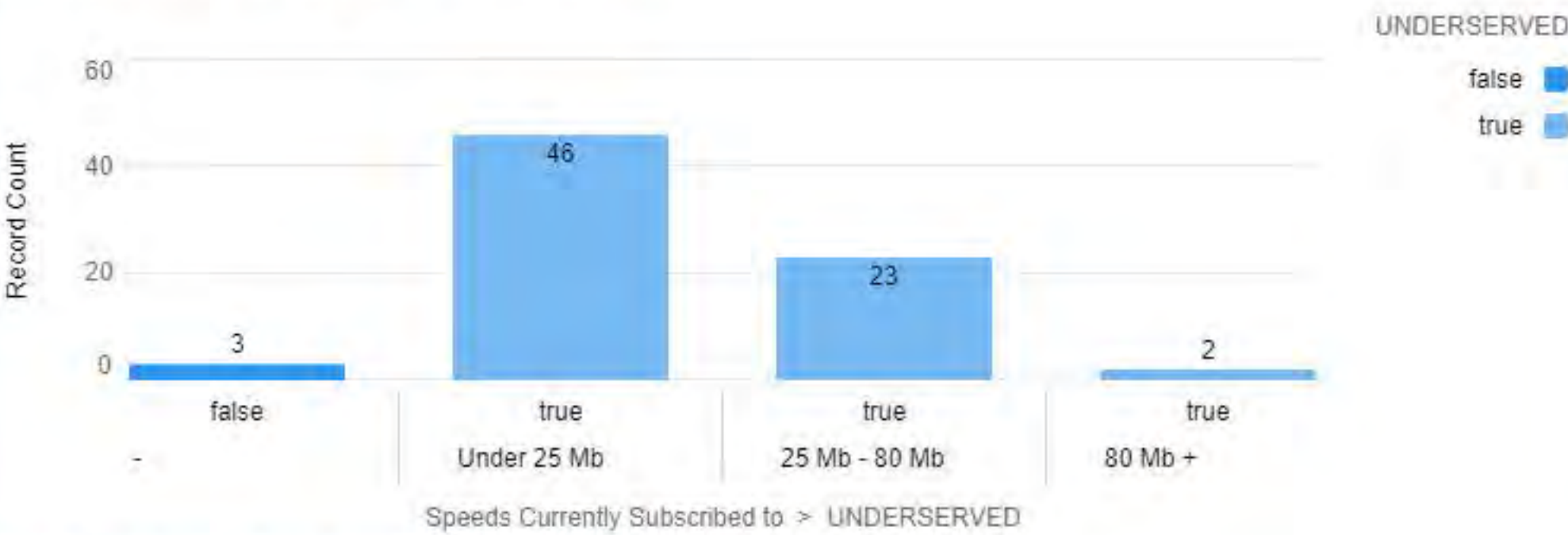
Empower Rural Iowa Broadband Grants
Program

Minburn Perry Rural By Underserved/Speed



[View Report \(Minburn Perry Rural By Underserved/Speed\)](#)

Minburn Perry Rural By Underserved/Speed



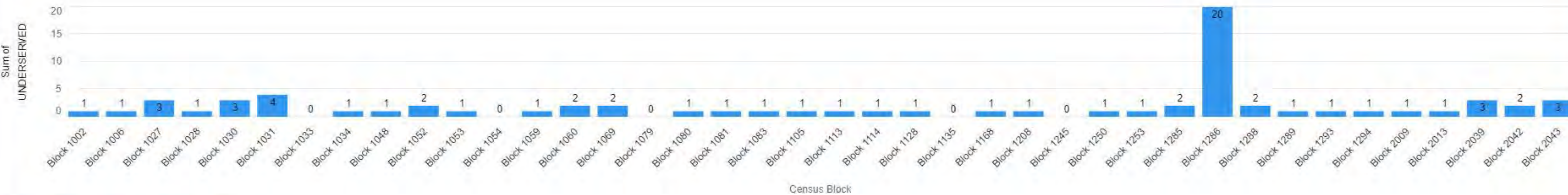
[View Report \(Minburn Perry Rural By Underserved/Speed\)](#)

Minburn Perry Rural By Connection Type



[View Report \(Minburn Perry Rural By Type/Underserved\)](#)

Minburn Perry Rural by Census Block



[View Report \(Minburn Perry Rural by Census Block\)](#)

Minburn Perry Rural Total

As of 2021-07-16 09:54:34 Pacific Standard Time/PST • Generated by Chkpt Minburn

Filtered By

Show: All service order

Challenge/Application equals Minburn Perry Rural

Upload Speed not equal to

Census Block ↑	Service Address	Challenge/Application	Speeds Currently Subscribed to	UNDERSERVE	Upload Speed	Download Speed	Connection Type
Block 1002	12619 HOUSTON AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	3	12	Fixed Wireless
Subtotal	Sum Count	1		1			
Block 1006	15925 130TH ST DAWSON	Minburn Perry Rural	80 Mb +	TRUE	25	75	Cellular
Subtotal	Sum Count	1		1			
Block 1027	18323 160TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	22	0	Cellular
	18317 160TH ST PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	1	36	Satellite
	15292 HULL AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	0	0	Cellular
Subtotal	Sum Count	3		3			
Block 1028	16933 142ND PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	12	2	Satellite
Subtotal	Sum Count	1		1			
Block 1030	17187 160TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	8	8	Fixed Wireless
	14976 H AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	33	3	Fixed Wireless
	14976 H AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	15	30	Satellite
Subtotal	Sum Count	3		3			
Block 1031	14405 H AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	1	1	DSL
	14157 GREEN DR PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	19	7	Fixed Wireless
	14106 GREEN DR PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	19	57	Fixed Wireless
	14405 H AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	15	38	Cellular
Subtotal	Sum Count	4		4			
Block 1033	15871 141ST ST PERRY	Minburn Perry Rural	Under 25 Mb		Don't Know	Don't Know	Satellite
	15244 130TH ST DAWSON	Minburn Perry Rural	25 Mb - 80 Mb		Don't Know	Don't Know	Satellite
Subtotal	Sum Count	2		0			
Block 1034	13850 130TH STREET DAWSON	Minburn Perry Rural	Under 25 Mb	TRUE	20	9	Satellite
Subtotal	Sum Count	1		1			
Block 1048	16174 150TH ST PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	15	40	Satellite
Subtotal	Sum Count	1		1			
Block 1052	16954 KILLAREN DR PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	1	23	Fixed Wireless
	16954 KILLAREN DR PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	1	23	Fixed Wireless
Subtotal	Sum Count	2		2			
Block 1053	18927 170TH ST PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	0	0	Fixed Wireless
Subtotal	Sum Count	1		1			
Block 1054	19559 180TH ST PERRY	Minburn Perry Rural	Under 25 Mb	FALSE	52	108	Fixed Wireless
Subtotal	Sum Count	1		0			
Block 1059	15043 K AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	0	0	Fixed Wireless
Subtotal	Sum Count	1		1			
Block 1060	15628 K AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	1	1	Cellular
	15336 K AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	FALSE	27	27	Satellite
	15621 L AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	1	3	Cellular
	20815 170TH ST PERRY	Minburn Perry Rural		FALSE	15.3	3.59	Don't Know
Subtotal	Sum Count	4		2			
Block 1069	18010 180TH LN PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	11	10	Satellite
	18308 180TH LN PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	2	1	Cellular
Subtotal	Sum Count	2		2			
Block 1079	16285 190TH ST PERRY	Minburn Perry Rural	Under 25 Mb		Don't Know	Don't Know	Cellular
Subtotal	Sum Count	1		0			
Block 1080	16359 180TH ST PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	0	24	Satellite
Subtotal	Sum Count	1		1			
Block 1081	17833 G AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	0	8	Satellite
Subtotal	Sum Count	1		1			
Block 1083	14115 170TH ST DAWSON	Minburn Perry Rural	Under 25 Mb	TRUE	21	0	Satellite
Subtotal	Sum Count	1		1			
Block 1105	19137 F AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	16	101	Fixed Wireless
Subtotal	Sum Count	1		1			
Block 1113	16140 190TH ST PERRY	Minburn Perry Rural	25 Mb - 80 Mb	FALSE	257	53	Fixed Wireless
	19077 H AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	18	30	Cellular
Subtotal	Sum Count	2		1			
Block 1114	19314 H AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	0	0	Fixed Wireless
Subtotal	Sum Count	1		1			
Block 1128	15999 220TH ST MINBURN	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	0	0	None
Subtotal	Sum Count	1		1			
Block 1135	16373 230TH ST MINBURN	Minburn Perry Rural	Under 25 Mb		Don't Know	Don't Know	Fixed Wireless
Subtotal	Sum Count	1		0			
Block 1168	16347 240TH ST MINBURN	Minburn Perry Rural	Under 25 Mb	TRUE	8	16	Fixed Wireless

Subtotal	Sum Count				1			
Block 1208		16822 142ND PL PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	12	51	Fixed Wireless
Subtotal	Sum Count				1			
Block 1245		2222 G AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb		Don't Know	Don't Know	Fixed Wireless
Subtotal	Sum Count				0			
Block 1250		2160 CLOVER AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	FALSE	26	30	Cellular
		2176 D AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	8	12	Cellular
Subtotal	Sum Count				1			
Block 1253		197 325TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	22	18	Cellular
		135 325TH ST PERRY	Minburn Perry Rural	Under 25 Mb		Don't Know	Don't Know	Satellite
Subtotal	Sum Count				1			
Block 1285		396 329TH PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	10	6	Fixed Wireless
		362 332ND PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	15	38	Satellite
Subtotal	Sum Count				2			
Block 1286		2290 DERI PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	3	4	Fixed Wireless
		361 332ND PL PERRY	Minburn Perry Rural	80 Mb +	TRUE	17	26	Satellite
		357 330TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	3	22	Fixed Wireless
		364 332ND PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	5	13	Fixed Wireless
		366 332ND PL PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	5	24	Satellite
		364 332ND PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	4	14	Fixed Wireless
		353 332ND PL PERRY	Minburn Perry Rural	Under 25 Mb	FALSE	69	156	Satellite
		353 330TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	6	12	Fixed Wireless
		373 335TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	7	1	Satellite
		354 332ND PL PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	0	9	DSL
		2285 DERI PL PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	25	31	Fixed Wireless
		2296 DEVIN PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	5	19	Fixed Wireless
		349 330TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	12	7	Satellite
		2289 DERI PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	8	0	Fixed Wireless
		2298 DEVIN PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	19	54	Fixed Wireless
		343 330TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	7.7	24	Fixed Wireless
		2285 DERI PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	1	17	Fixed Wireless
		355 332ND PL PERRY	Minburn Perry Rural		FALSE	41	15	Don't Know
		351 332ND PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	0	0	None
		356 332ND PL PERRY	Minburn Perry Rural	Under 25 Mb	FALSE	51	71	Fixed Wireless
		2288 DERI PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	4	21	Fixed Wireless
		369 332ND PL PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	13	14	Satellite
		369 335TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	16	26	Satellite
Subtotal	Sum Count				20			
Block 1288		2347 D AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	29	1	Fixed Wireless
		258 330TH ST PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	24	14	Fixed Wireless
Subtotal	Sum Count				2			
Block 1289		2288 C AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	8	18	Satellite
Subtotal	Sum Count				1			
Block 1293		2365 D AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	3	1	DSL
Subtotal	Sum Count				1			
Block 1294		2376 D AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	6	3	Fixed Wireless
Subtotal	Sum Count				1			
Block 2009		22603 130TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	1	12	DSL
Subtotal	Sum Count				1			
Block 2013		12360 K DR PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	0	1	DSL
Subtotal	Sum Count				1			
Block 2039		13260 M AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	6	14	Fixed Wireless
		13773 N AVE BOUTON	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	15	61	Don't Know
		13277 N AVE BOUTON	Minburn Perry Rural	Under 25 Mb	TRUE	3	13	Fixed Wireless
Subtotal	Sum Count				3			
Block 2042		13401 M AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	13	29	Fixed Wireless
		13211 M AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	23	25	Fixed Wireless
Subtotal	Sum Count				2			
Block 2043		13605 PARTRIDGE TRL PERRY	Minburn Perry Rural	Under 25 Mb		Don't Know	Don't Know	Satellite
		13768 PARTRIDGE TRL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	1	4	Fixed Wireless
		13682 L PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	0	4	Satellite
		13542 PHEASANT LN PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	18	6	Fixed Wireless
		13771 PARTRIDGE TRL PERRY	Minburn Perry Rural		FALSE	16	3	Don't Know
Subtotal	Sum Count				3			
Total	Sum Count				71			
		87						

Minburn Telephone Company

Challenge – Perry Rural

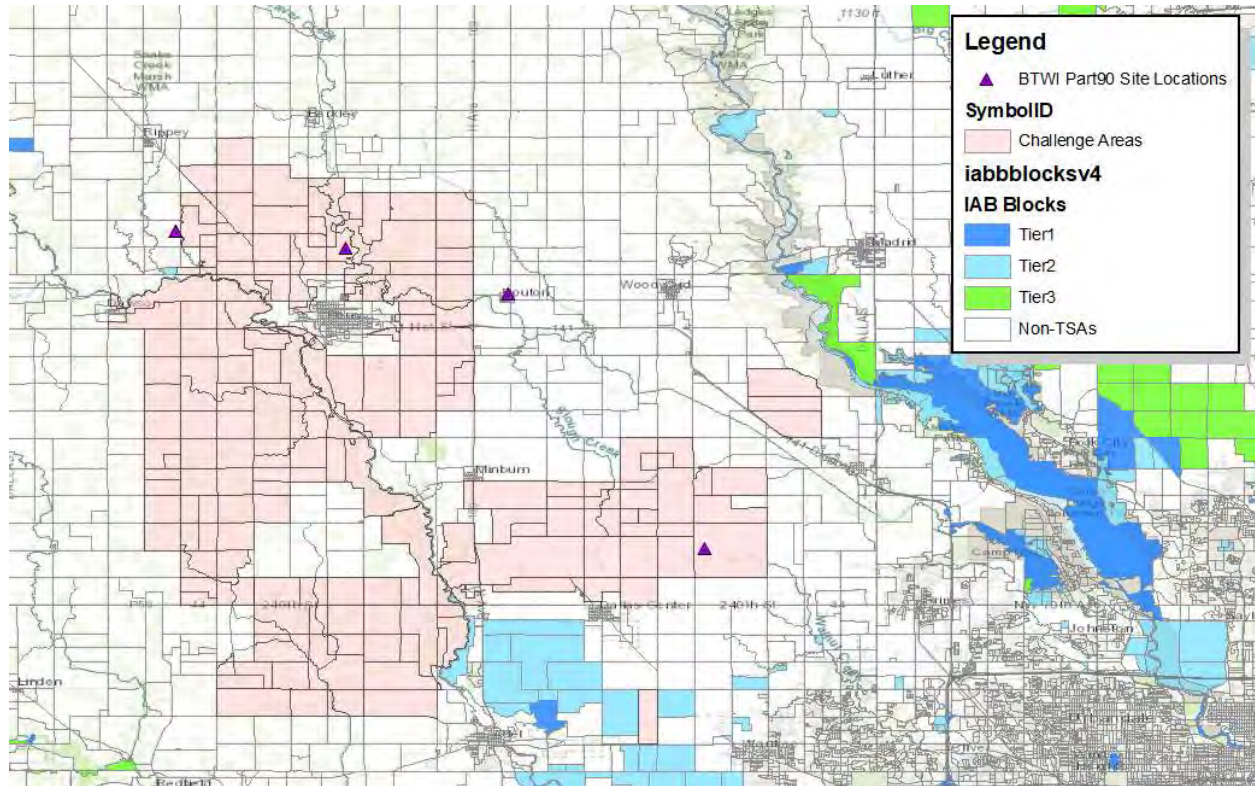
Bits of Technology Wireless Internet Challenge

Perry Rural Broadband Expansion

Empower Rural Iowa Broadband Grants
Program

SECTION 3) Bits of Technology Wireless Internet, LLC Challenge

Bits of Technology Wireless Internet, LLC (BTWI) is listed as having advertised throughputs of 100/50Mbps (downlink/uplink, respectively) throughout the Census Blocks (CBs) that Minburn Telephone Company (Minburn) is presenting within this challenge, as shown below.



Through field validation at common Bouton site, Minburn documented that BTWI is utilizing equipment manufactured by Ubiquiti Networks (Ubiquiti) in the unlicensed 2.4GHz and 5.2/5.8GHz frequency bands, as well as the lightly-licensed, Part 90 frequency band.

For its unlicensed operations BTWI is utilizing Ubiquiti's LTU and Rocket 2AC Prism equipment. The manufacturer documentation for the Ubiquiti LTU equipment indicates for the maximum channel width of 50MHz is capable of achieving a maximum throughput of 600Mbps (aggregate, uplink and downlink). With a maximum of 600Mbps throughput, at the 100/50Mbps advertised speed tiers, if dedicated, BTWI would only be capable of servicing four to six subscribers¹ per LTU sector, assuming BTWI is able to secure an unencumbered 50MHz wide channel with the unlicensed 5GHz band.

The manufacturer documentation for the Ubiquiti Rocket 2AC Prism equipment indicates for the maximum channel width of 40MHz is capable of achieving a maximum throughput of 330Mbps (aggregate, uplink and downlink). With a maximum of 330Mbps throughput, at the 100/50Mbps advertised speed tiers, if dedicated, BTWI would only be capable of servicing two to three subscribers²

¹ Four subscribers if considering the aggregated throughput or six subscribers is considering only the downlink throughput.

² Two subscribers if considering the aggregated throughput or three subscribers is considering only the downlink throughput.

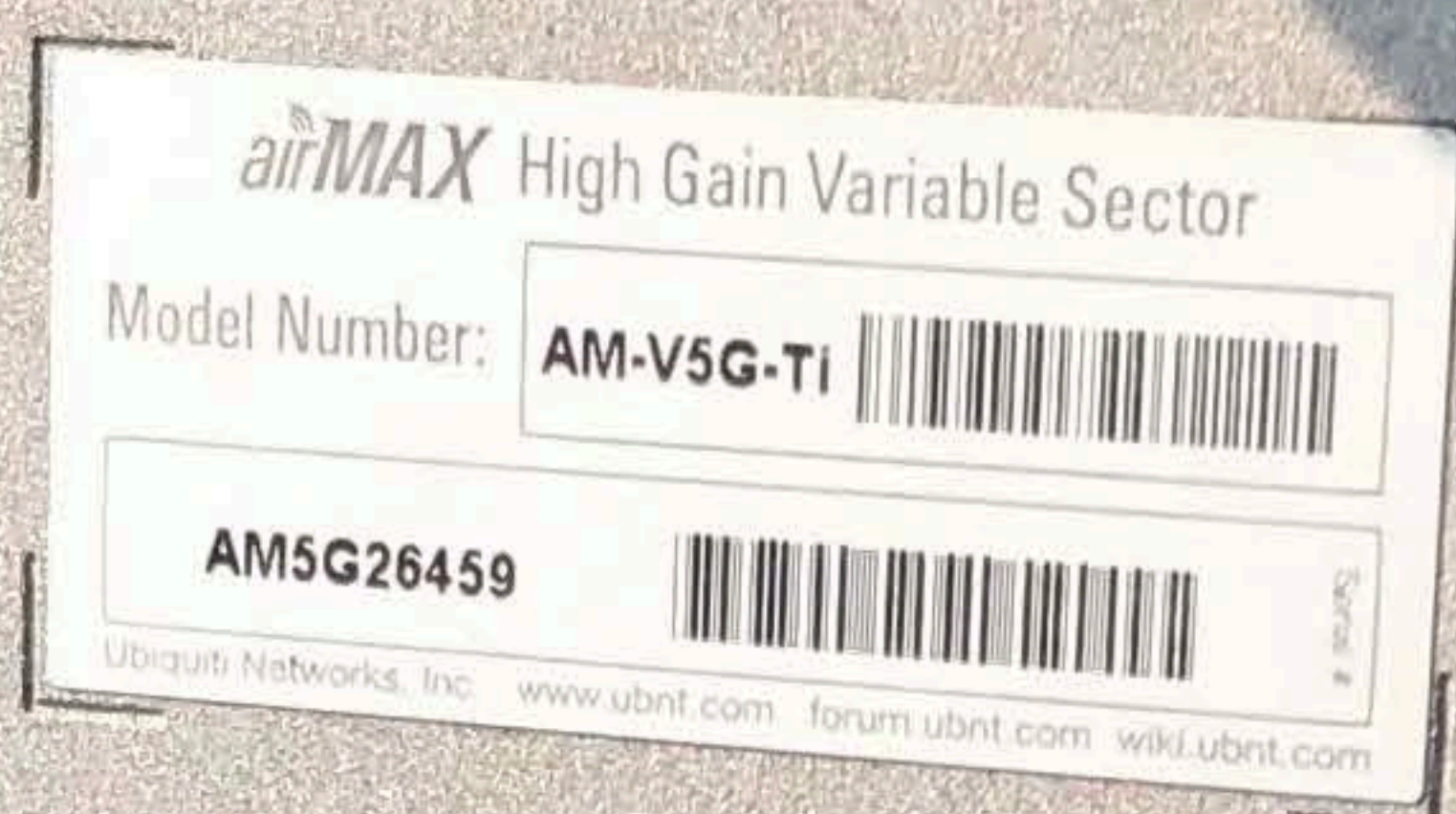
per Rocket 2AC Prism sector, assuming BTWI is able to secure an unencumbered 50MHz wide channel with the unlicensed 5GHz band.

BTWI is also utilizing its Nationwide Nonexclusive, Part 90 license (3650-3700MHz), under Call Sign WQOU655, to deliver service to the CBs that Minburn is challenging. In 2015, the FCC released its Part 96 ruleset (3550-3700MHz), which encapsulated the spectrum formerly licensed under its Part 90 ruleset. The FCC allowed existing operators to continue operating their Part 90 networks through October 17, 2020, or through the expiration of their license terms, whichever is longer. BTWI's license under Call Sign WQOU655 has a license expiration of February 3rd, 2022, at which time BTWI must transition its operations to follow the Part 96 ruleset or cease operations. Per the FCC's Universal Licensing System (ULS), BTWI has twelve site locations³ registered and each site location indicates that it utilizes equipment with the FCC ID of SWX-M365. FCC ID of SWX-M365 is Ubiquiti Networks (Ubiquiti) M365 product line and it is worth noting that the Ubiquiti's M365 product line has not received FCC type-acceptance for the operation under the Part 96 ruleset. The lack of FCC type-acceptance will require BTWI prior to February 3rd, 2022, to replace its Part 90 network with a Part 96-compliant manufacturer, equipment capable of operating on different frequency band or cease operations altogether.

With its unlicensed operations, its Part 90 license expiring on February 3rd, 2022, and the uncertainty created by its selected manufacturer, Minburn questions BTWI's viability to deliver a sustained, consistent 100/50Mbps service to the majority of the locations in the indicated rural CBs utilizing typical customer configurations and site loading considerations.

³ Per the FCC's definition each individual Part 90 sector needed to be registered and authorized by the FCC prior to operation, so in terms of the ULS a sector is equivalent to a site, although in industry-speak a site may be deployed supporting multiple sectors. In BTWI's case there are twelve sectors comprising 8 different site locations.









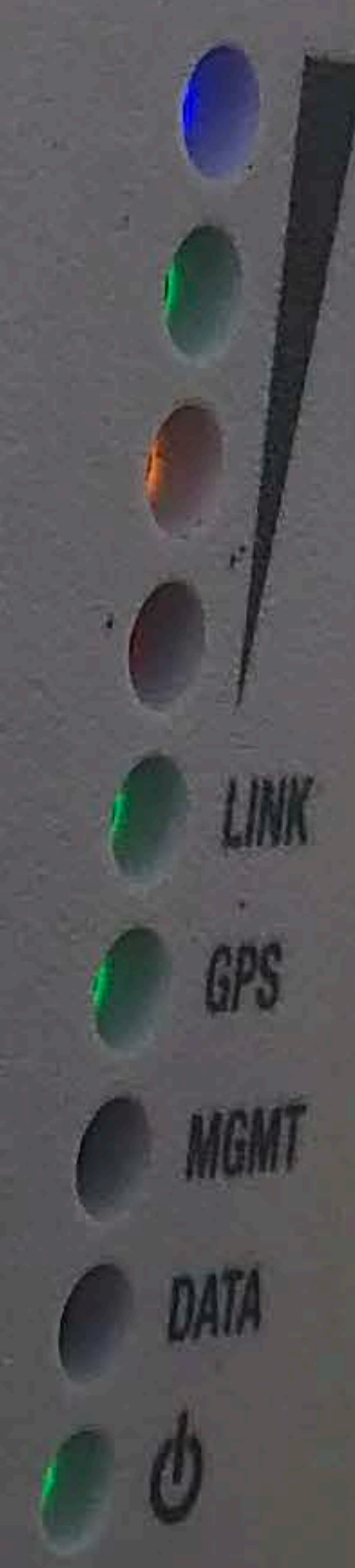












airFiber^{5X HD}













Minburn Telephone Company

Challenge – Perry Rural Affidavits

Perry Rural Broadband Expansion

Empower Rural Iowa Broadband Grants
Program

**Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309**

In the Matter of

Broadband Grants Program
Empower Rural Iowa

)
) NOFA #006
)
)

SWORN STATEMENT OF Eileen M. Splendore

I, **Eileen M. Splendore**, being of lawful age and duly sworn, state as follows:

1. My name is **Eileen M. Splendore**, my address is 18584 180th Street, Perry, IA 50220
2. At 12:54 P.M. on 7/16/21, I made an internet inquiring for Century Link Customer Service at <https://shop.centurylink.com/uas/>
3. The website informed me that they do not offer service to me at this time
4. This completes my Sworn Statement.

Eileen Splendore

Declarant

SWORN to and subscribed before me, this 16th day of July, 2021.



[Signature]
NOTARY PUBLIC

My Commission Expires:

8/20/2021

**Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309**

In the Matter of)
) NOFA #006
Broadband Grants Program)
Empower Rural Iowa)

SWORN STATEMENT OF Cindy Sohn

I, **Cindy Sohn**, being of lawful age and duly sworn, state as follows:

1. My name is **Cindy Sohn**.
2. At 9:25 A.M. on 7/16/2021, I contacted CenturyLink to inquire about getting internet service at my residence located at: 16841 142nd Place, Perry, Iowa 50220.
3. I made an internet inquiry for Century Link Customer Service at: <https://shop.centurylink.com/nc>
4. CenturyLink's website informed me that I do have a DSL residential service option available for internet with download speed up to 1.5 Mbps and upload speed up to 500 kbps for \$50/month.
5. This completes my Sworn Statement.


Declarant

SWORN to and subscribed before me, this 16th day of July, 2021.




NOTARY PUBLIC

My Commission Expires:

8/20/2021

**Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309**

In the Matter of)
) NOFA #006
Broadband Grants Program)
Empower Rural Iowa)

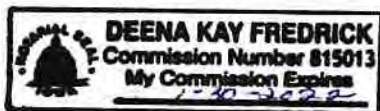
SWORN STATEMENT OF Daniel J. Spellman

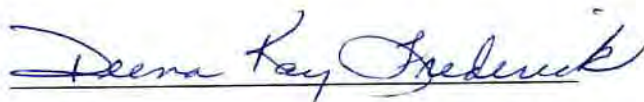
I, **Daniel J. Spellman**, being of lawful age and duly sworn, state as follows:

1. My name is **Daniel J. Spellman**.
2. At 12:38 P.M. on 7/13/2021, I called CenturyLink to inquire about getting internet service at 15292 Hull Avenue, Perry, Iowa 50220. I have attached my notes from my call with Trafar, CenturyLink Customer Care Agent.
3. I called Century Link Customer Service at (888) 856-2778.
4. I spoke with Trafar, CenturyLink's Customer Care Agent who informed me I have no residential service options for internet.
5. Trafar told me that Century Link doesn't offer service to me at this time and has no plans to extend service to our address but we could try a satellite provider not affiliated with their company.
6. The call ended at 12:55 P.M.
7. This completes my Sworn Statement.


Declarant

SWORN to and subscribed before me, this 13th day of July, 2021.





NOTARY PUBLIC

My Commission Expires:

1-30-2022

**Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309**

In the Matter of)
) NOFA #006
Broadband Grants Program)
Empower Rural Iowa)

SWORN STATEMENT OF

Cliff Fagen

I, Cliff Fagen, being of lawful age and duly sworn, state as follows:

1. My name is Cliff Fagen.
2. At 1:30 am/pm on 7/12/21 (date), I called BTWI (company name), to inquire about getting service at 351 332nd Place (address), Perry IA (city, state). I have attached my notes from my call with _____ (CSR name/title), and have labeled it "Attachment A."
3. I called the BTWI (company name) number 465-3043 (telephone number)
4. I spoke with Steve (CSR name) who informed me I have _____ residential service options:
 - 10M/____ M for \$ 55⁰⁰
 - 15M/____ M for \$ 65⁰⁰
5. (Additional notes) _____
6. The call ended at 2:00 am/pm.
7. This completes my Sworn Statement.

Cliff Fagen
Declarant

SWORN to and subscribed before me, this the 14th day of July, 2021.



Gina L. McLaughlin
NOTARY PUBLIC

My Commission Expires:

February 5, 2024

(Notary Stamp Above)

Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309

In the Matter of

Broadband Grants Program
Empower Rural Iowa

NOFA #006

SWORN STATEMENT OF Kent Scheib

I, Kent Scheib, being of lawful age and duly sworn, state as follows:

1. My name is Kent Scheib.
2. At 10:11 am on 7/15/21 (date), I called Century Link (company name), to inquire about getting service at 16822 142nd Place (address), Perry, Iowa (city, state). I have attached my notes from my call with _____ (CSR name/title), and have labeled it "Attachment A."
3. I called the Century Link (company name) number 800-201-4099 (telephone number).
4. I spoke with Jackie (CSR name) who informed me I have 1 residential service options:
 - 1.5mb/500KB or
 M/ M for \$ 50
 - M/ M for \$
5. (Additional notes) A.
6. The call ended at 10:25 am.
7. This completes my Sworn Statement.

Kent Scheib
Declarant

SWORN to and subscribed before me, this the 15 day of July, 2021.



(Notary Stamp Above)

[Signature]
NOTARY PUBLIC

My Commission Expires:

9/20/2021

**Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309**

In the Matter of)
) NOFA #006
Broadband Grants Program)
Empower Rural Iowa)

SWORN STATEMENT OF David A. Wambold

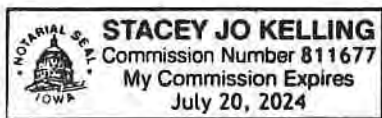
I, David A. Wambold, being of lawful age and duly sworn, state as follows:

1. My name is David A. Wambold.
2. At 2:31pm on 7/14/21(date), I called Minburn Communications(company name), to inquire about getting service at 24299 150th St.(address), Bouton, IA (city,state). I have attached my notes from my call with Gina McLaughlin, CSR (CSR name/title), and have labeled it "Attachment A."
3. I called the Minburn Communications(company name) number 515-438-2200(telephone number).
4. I spoke with Gina McLaughlin (CSR name) who informed me I have 3 residential service options:
 - 20M/1M for \$104.99
 - 15M/1M for \$84.99
 - 10M/1M for \$64.99
5. (Additional notes)
6. The call ended at 2:35pm.
7. This completes my Sworn Statement.

4.17/.86

David A. Wambold 7-15-21
Declarant

SWORN to and subscribed before me, this the 14th day of July, 2021.



(Notary Stamp Above)

Stacey Jo Kelling
NOTARY PUBLIC
My Commission Expires:
July 20, 2024

**Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309**

In the Matter of)
) NOFA #006
Broadband Grants Program)
Empower Rural Iowa)

SWORN STATEMENT OF Eric M. Ash

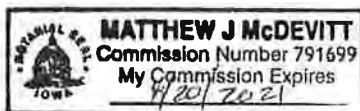
I, **Eric M. Ash**, being of lawful age and duly sworn, state as follows:

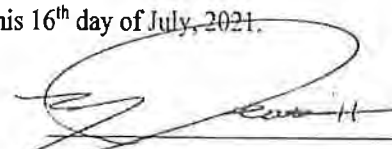
1. My name is **Eric M. Ash**.
2. At 9:02 ~~A~~M. on 7/16/2021, I contacted CenturyLink to inquire about getting internet service at my residence located at: 16933 142nd Place, Perry, Iowa 50220.
3. I made an internet inquiry Century Link Customer Service at: <https://shop.centurylink.com/nc>
4. CenturyLink's website informed me that I do have a DSL residential service option available for internet with download speed up to 1.5 Mbps and upload speed up to 500 kbps for \$50/month. Currently we pay \$75/month for up to 12.5 Mbps download from BTWI.
5. This completes my Sworn Statement.



Declarant

SWORN to and subscribed before me, this 16th day of July, 2021.





NOTARY PUBLIC

My Commission Expires:

8/20/2021

**Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309**

In the Matter of)
) NOFA #006
Broadband Grants Program)
Empower Rural Iowa)

SWORN STATEMENT OF John Cavanaugh

I, John Cavanaugh, being of lawful age and duly sworn, state as follows:

1. My name is John Cavanaugh.
2. At 9:24 AM on 7/12/21 (date), I called Bits of Technology Wireless Internet LLC (BTWI) (company name), to inquire about getting service at 396 329th Place (address), Perry, IA (city,state). I have attached my notes from my call with Billing Department (name not provided) and Steve (technician) (CSR name/title), and have labeled it "Attachment A."
3. I called the BTWI (company name) number 515-465-3043 (telephone number).
4. I spoke with Billing Department (name not provided) (CSR name) who informed me I have 5 or 6 residential service options:
 - 10M/3M for \$55
 - 15M/5M for \$65
 - 20M/6M for \$75
 - 30M/10M for \$85
 - 50M/16M for \$100
5. (Additional notes)

BTWI just upgraded speeds in the past few weeks. A new 100M/50M was just added, but I was told I likely don't qualify for this due to line of sight issues with the towers.
6. The call ended at 9:32 AM.
7. This completes my Sworn Statement.

Declarant

SWORN to and subscribed before me, this the 12th day of July, 2021.



Gina L. McLaughlin
NOTARY PUBLIC

My Commission Expires:

2/5/2024

(Notary Stamp Above)

ATTACHMENT A

PHONE CALL NOTES

I called BTWI at 515-465-3043 at 9:24 AM on 7/12/21. I was greeted by the Billing Department employee who did not provide her name. I told her I was an existing subscriber, and that I had both billing and technical questions. We covered the billing questions first, before I was transferred to a technical resource.

I asked about the recent speed increases and the pricing changes. She informed me no pricing changes had occurred. I was told each speed tier was increased by 60%. The current speed tiers are:

- 10M/3M for \$55
- 15M/5M for \$65
- 20M/6M for \$75
- 30M/10M for \$85
- 50M/16M for \$100
- 100M/50M with a quote for custom hardware and installation

Although the website has been updated to reflect the new plans, no official notice has been sent to customers as they are still evaluating the impact of the upgraded speeds on the network. They expect a notice will be sent to customers soon.

I spoke to Steve next regarding the technical issues. He has not received any new information on what the technician saw last week and the follow up they were going to have with the tower specialist. He said he would ask about this and call me back when he has more information.

BACKGROUND

I have been a BTWI internet subscriber since moving to Perry in 2017. For much of this period, I have subscribed to the top speed tier. As network engineer who works remotely instead of commuting into the Des Moines metro every day, reliable broadband internet is vital.

My roof was damaged in the derecho storm last year, and after having it replaced this spring, BTWI had to remount the antenna equipment. There were problems after this, but BTWI was quick to try to resolve the issue, even installing a new sector antenna at the tower to try to improve service. This has worked very well at the 30M/10M speed up until mid-June.

After calling BTWI, they confirmed that on 6/18/21 at 3:00 AM, my signal strength sharply dropped by 16db. The first call that I made somehow fell through the cracks, and no ticket was generated. After the July 4th weekend, I decided to follow up. Steve confirmed again the drop in signal strength, but

this time they had a technician come out within 30 minutes to troubleshoot the issue. After trying to adjust the antenna, the technician said that while the signal improved by 1-2db, they couldn't get back to the level they had before June. They are continuing to investigate this pending a follow up with their tower specialist.

Despite their recent increase on my plan from 30Mb/s to 50Mb/s, I am only achieving download speeds from 10-32Mb/s depending on the varying signal strength. The technician said if they can't get the signal improved that it may be best to drop to a lower speed tier like the 30M/10M due to match the real speed expectations between my location and the tower.

100M/50M PLAN

I was unaware of the speed increases by BTWI until I reviewed the OCIO broadband map to determine why our "Targeted Service Area" didn't qualify for NOFA #006 broadband grant funds. I see that most of our rural area is disqualified by the 100Mb/s plan offered by BTWI.

I commend BTWI for their efforts to improve connectivity in rural Iowa. I have appreciated their speed to resolve issues and the personal service offered by their staff. However, I would strongly urge that their 100Mb/s service not be considered generally available for the following reasons:

- I was told that while the 100M plan is now on their price sheet, no residential customers have it currently. I was told they will be having a meeting this week to discuss deployment details.
- The service requires custom hardware and installation that requires a quote. This is comparable to the more costly and customized business tier services they provide. The price is undefined, which makes it hard to compare to other residential broadband options.
- I believe the service is delivered using unlicensed spectrum (2.4Ghz or 5Ghz). This overlaps with consumer grade wireless equipment. This invites interference which can negatively affect service quality. It could be unfair to compare it with dedicated LTE spectrum or dedicated fiber or copper infrastructure.
- I was told that with my line of sight issues, I would likely be unable to take advantage of the service myself. I am just one example, but I think this illustrates the varied reach and quality of fixed wireless solutions. This makes it easier to overestimate homes passed when compared to dedicated copper or fiber infrastructure, which is much easier to quantify.

REFERENCES

BTWI Plans - <https://btwi.net/#plans>

BTWI Extended Price Sheet - <https://btwi.net/pricing>

**Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309**

In the Matter of)
) NOFA #006
Broadband Grants Program)
Empower Rural Iowa)

SWORN STATEMENT OF Raymond L Knapp, Jr

I, Raymond L Knapp, Jr, being of lawful age and duly sworn, state as follows:

1. My name is Raymond L Knapp, Jr.
2. At _____ am/pm on _____ (date), I called medicom (see attached) (company name), to inquire about getting service at _____ (address), _____ (city, state). I have attached my notes from my call with _____ (CSR name/title), and have labeled it "Attachment A."
3. I called the _____ (company name) number _____ (telephone number).
4. I spoke with _____ (CSR name) who informed me I have _____ residential service options:
 - M/ M for \$
 - M/ M for \$
5. (Additional notes) _____
6. The call ended at _____ am/pm.
7. This completes my Sworn Statement.

Raymond L Knapp, Jr
Declarant

SWORN to and subscribed before me, this the 15th day of July, 2021.



(Notary Stamp Above)

Gina L McLaughlin
NOTARY PUBLIC

My Commission Expires:

February 5, 2024

414 2nd St
Perry, IA 50220

Internet history here at this address.

The first internet service I had was PrairieNet service that was over the air service. This service was relatively good for the time but the service degraded because trees matured, they caused interference between my house antenna and the water tower source. I had find a new service.

I had CenturyLink phone service in my part of town. The only problem was that the infrastructure was so old that the copper wire insulation was deteriorating to the point there was a lot of noise on the lines. The tech had to keep finding wire pairs without marker wires to provide good phone service.

I made the jump to CenturyLink internet but it was never very fast and my job in Des Moines needed me to have good service. I needed faster speeds so I jumped to a bonded pair of wires and was to have 20 meg speed. This service was not reached at most it was 10 meg. I put up with this service for years and was never pleased with the service. CenturyLink never felt the upgrading of the infrastructure was worth their time and money. They also used shady advertising by saying they had installed fiber service. They installed fiber to feed the copper that was the weakest link they had. Time to change.

Mediacom was the only solution. BTWI Wireless Internet was not useful because of the trees between my location and their towers. I first went with the 20 meg service from Mediacom for several month and it work ok but was subject to outages. Then they offered us 1 gig service at the same price so we took that option.

I have attached an excel spreadsheet that shows the actual speeds over several years. This was also accompanied by a under par service customer service.

The other major issue I have is none of the services a backup for their internet feed. We have had several times that construction workers have hit lines feeding Perry and taken out all internet and phones. I am in the process of creating a business web site and I am going to need to have a dependable system for that system.

My background is I am a retired computer programmer.

I have visited with some of the business users in Perry, IA and found that Minburn Communications has developed a very dependable fiber system. Several of the companies had dropped their backup internet service because Minburn fiber was so dependable.

I feel that Perry Iowa is an underserved in it communications to the outside area and needs to have more competition that would improve all of the services provided to the citizens of the community.

Raymond L Knapp, Jr

K & H Bee Farm, LLC
(515) 249-1899

Date	Time	Connection	Ping	Jitter	Download*	Upload*	Server	Program	* = Mbps
Tuesday, January 29, 2019	7:38 PM	Wired	16		78.43	10.90	State of Iowa	speedtest.net	
Tuesday, January 29, 2019	7:42 PM	wired	26		587.17	14.80	State of Iowa	speedtest.net	
Tuesday, January 29, 2019	7:45 PM	Wired	8	2	935.10	7.50	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, January 29, 2019	7:49 PM	Wired	8	1	939.60	10.80	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, January 30, 2019	5:23 AM	Wired	8	1	939.50	19.70	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, January 30, 2019	5:26 AM	Wired	33		224.77	13.82	State of Iowa	speedtest.net	
Wednesday, January 30, 2019	11:31 AM	Wired	8	1	936.30	13.40	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, January 31, 2019	12:33 PM	Wired	7	2	957.90	64.30	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, February 01, 2019	1:12 PM	Wired	17	2	958.70	64.40	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, February 05, 2019	10:05 AM	Wired	9	1	942.10	61.20	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, February 05, 2019	5:21 PM	Wired	8	2	955.30	61.80	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, February 05, 2019	7:54 PM	Wired	9	1	854.80	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, February 07, 2019	10:53 PM	Wired	8	2	962.20	62.90	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, February 08, 2019	10:37 AM	Wired	8	1	945.60	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, February 10, 2019	10:35 AM	Wired	15	4	946.60	64.30	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, February 13, 2019	2:40 PM	Wired	7	2	964.30	63.20	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, February 25, 2019	11:12 AM	Wired	9	1	941.20	62.20	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, March 05, 2019	7:46 PM	Wired	7	1	935.70	7.00	Mediacom Communications	speedtest.mediacomtoday.com	Reported problems service call scheduled
Wednesday, March 06, 2019	2:52 PM	Wired	8	1	947.40	7.10	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, March 08, 2019	2:03 PM	Wired	9	13	967.00	11.30	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, March 08, 2019	2:06 PM	Wired	8	6	980.50	10.20	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, March 09, 2019	11:47 AM	Wired	8	49	939.50	6.20	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, March 10, 2019	11:31 AM	Wired	8	1	967.40	9.90	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, March 11, 2019	8:31 AM	Wired	7	2	941.80	6.30	Mediacom Communications	speedtest.mediacomtoday.com	Teck was hear
Monday, March 11, 2019	8:55 PM	Wired	9	1	939.50	60.60	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, March 11, 2019	8:57 PM	Wired	5	4	942.50	60.30	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, March 12, 2019	6:41 AM	Wired	7	5	939.00	63.30	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, March 13, 2019	9:26 AM	Wired	7	1	935.50	62.70	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, March 14, 2019	4:26 PM	Wired	6	4	949.50	61.00	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, March 16, 2019	10:11 AM	Wired	21	3	883.50	60.60	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, March 18, 2019	8:43 PM	Wired	6	2	835.80	63.90	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, March 22, 2019	9:46 AM	Wired	8	1	690.10	62.60	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, March 22, 2019	9:47 AM	Wired	8	1	549.70	64.50	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, March 22, 2019	11:00 PM	Wired	7	1	641.20	61.50	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, March 23, 2019	9:39 AM	Wired	8	2	800.80	64.00	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, February 25, 2019	12:56 PM	Wired	5	4	641.80	63.70	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, March 27, 2019	10:42 AM	Wired	8	2	505.40	63.80	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, March 28, 2019	11:48 AM	Wired	9	4	552.50	61.90	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, March 30, 2019	5:03 PM	Wired	8	1	605.20	61.80	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, March 31, 2019	1:38 PM	Wired	7	2	500.40	62.60	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, April 03, 2019	9:01 AM	Wired	7	3	511.30	62.10	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, April 05, 2019	1:11 PM	Wired	6	3	536.90	62.90	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, April 06, 2019	6:20 PM	Wired	7	1	938.10	63.90	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, April 08, 2019	6:11 PM	Wired	7	1	953.00	5.40	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, April 08, 2019	6:20 PM	Wired	5	49	958.10	5.00	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, April 09, 2019	10:18 AM	Wired	7	1	737.20	63.90	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, April 11, 2019	8:24 AM	Wired	6	2	487.60	63.50	Mediacom Communications	speedtest.mediacomtoday.com	

Date	Time	Connection	Ping	Jitter	Download*	Upload*	Server	Program	* = Mbps
Friday, April 12, 2019	4:39 PM	Wired	7	1	369.00	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, April 13, 2019	3:08 PM	Wired	7	3	496.30	0.70	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, April 13, 2019	3:17 PM	Wired	7	3	634.90	3.10	Mediacom Communications	speedtest.mediacomtoday.com	Made call to re Sam restar 23 min call
Sunday, April 14, 2019	9:58 AM	Wired	7	24	387.50	62.90	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, April 14, 2019	10:35 PM	Wired	7	2	488.90	62.10	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, April 15, 2019	9:07 AM	Wired	8	2	450.30	9.30	Mediacom Communications	speedtest.mediacomtoday.com	Teck took off filter and checked wires
Monday, April 15, 2019	2:40 PM	Wired	7	72	490.40	2.40	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, April 16, 2019	8:42 AM	Wired	7	1	386.20	63.80	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, April 17, 2019	7:45 AM	Wired	6	1	519.80	63.50	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, April 18, 2019	2:54 PM	Wired	7	3	601.30	63.80	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, April 18, 2019	4:31 PM	Wired	8	1	717.00	62.70	Mediacom Communications	speedtest.mediacomtoday.com	Call to say it was not improved.
Friday, April 19, 2019	8:57 AM	Wired	8	1	722.80	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, April 20, 2019	7:29 AM	Wired	8	1	657.60	56.90	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, April 21, 2019	10:45 PM	Wired	7	1	589.10	42.30	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, April 21, 2019	10:46 PM	Wired	6	3	558.90	38.50	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, April 22, 2019	11:06 AM	Wired	8	1	607.40	55.30	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, April 24, 2019	7:56 AM	Wired	7	1	667.90	63.50	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, April 24, 2019	5:00 PM	Wired					Mediacom Communications	speedtest.mediacomtoday.com	System Down
Wednesday, April 24, 2019	6:44 PM	Wired					Mediacom Communications	speedtest.mediacomtoday.com	System down
Wednesday, April 24, 2019	10:00 PM	Wired					Mediacom Communications	speedtest.mediacomtoday.com	System back up
Thursday, April 25, 2019	12:17 PM	Wired	7	1	963.80	63.40	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, April 25, 2019	4:44 PM	Wired	7	3	967.10	63.40	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, April 27, 2019	9:12 AM	Wired	7	1	708.00	63.40	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, April 28, 2019	4:57 PM	Wired	4	2	966.20	62.70	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, April 28, 2019	9:17 PM	Wired	8	2	791.80	59.70	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, April 28, 2018	9:21 PM	Wired	8	2	666.80	60.50	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, April 29, 2019	7:30 AM	Wired					Mediacom Communications	speedtest.mediacomtoday.com	Down at 6. Rebooted and was up and went down again
Monday, April 29, 2019	10:44 AM	Wired	7	2	944.20	62.90	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, April 29, 2019	3:16 PM	Wired	7	2	904.30	62.50	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, April 30, 2019	9:19 AM	Wired	7	2	917.20	62.80	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, April 30, 2019	10:30 AM	Wired					Mediacom Communications	speedtest.mediacomtoday.com	Outage up at 12:30 P
Thursday, May 02, 2019	9:18 AM	Wired	7	2	686.60	64.00	Mediacom Communications	speedtest.mediacomtoday.com	Rain the past 24 hours
Saturday, May 04, 2019	12:27 PM	Wired	7	3	944.60	64.40	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, May 05, 2019	8:03 AM	Wired	7	1	948.80	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, May 07, 2019	10:06 AM	Wired	15	1	934.80	63.80	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, May 08, 2019	12:01 PM	Wired	15	1	941.80	65.80	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, May 09, 2019	2:30 PM	Wired	7	1	943.80	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, May 11, 2019	9:15 AM	Wired	15	2	932.40	63.10	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, May 12, 2019	12:51 PM	Wired	14	4	933.60	58.80	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, May 13, 2019	7:16 PM	Wired	7	1	960.20	63.30	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, May 14, 2019	12:01 PM	Wired	7	0	967.00	63.80	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, May 15, 2019	10:17 AM	Wired	7	4	926.10	61.70	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, May 17, 2019	10:13 AM	Wired	9	1	635.10	63.20	Mediacom Communications	speedtest.mediacomtoday.com	Bad storms last night
Saturday, May 18, 2019	11:40 AM	Wired	7	1	942.80	51.90	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, May 19, 2019	10:08 AM	Wired	7	1	943.30	63.70	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, May 20, 2019	7:10 PM	Wired	7	2	947.10	55.50	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, May 22, 2019	8:36 AM	Wired	9	1	659.90	54.90	Mediacom Communications	speedtest.mediacomtoday.com	Rain last night

Date	Time	Connection	Ping	Jitter	Download*	Upload*	Server	Program	* = Mbps
Wednesday, May 22, 2019	8:50 AM	Wired	6	1	942.10	59.80	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, May 24, 2019	9:12 AM	Wired	7	1	664.40	63.40	Mediacom Communications	speedtest.mediacomtoday.com	Bad storms last night
Saturday, May 25, 2019	10:08 AM	Wired	7	2	581.50	63.20	Mediacom Communications	speedtest.mediacomtoday.com	No storms last night but bad reading
Saturday, May 25, 2019	9:06 PM	Wired	7	1	584.50	63.30	Mediacom Communications	speedtest.mediacomtoday.com	.3 inches of rain
Sunday, May 26, 2019	7:06 PM	Wired	7	1	915.90	62.90	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, May 28, 2019	10:46 AM	Wired	7	1	558.40	62.80	Mediacom Communications	speedtest.mediacomtoday.com	.50 inches of rain
Wednesday, May 29, 2019	8:41 AM	Wired	7	3	944.20	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, May 30, 2019	3:33 PM	Wired	9	3	603.60	52.40	Mediacom Communications	speedtest.mediacomtoday.com	light rain last night
Thursday, May 30, 2019	3:47 PM	Wired	5	1	948.60	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, May 31, 2019	12:00 AM	Wired	7	1	657.90	63.30	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, May 31, 2019	2:25 PM	Wired	7	1	936.60	63.50	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, June 01, 2019	1:01 PM	Wired	9	2	368.60	63.30	Mediacom Communications	speedtest.mediacomtoday.com	Rain last night
Saturday, June 01, 2019	2:36 PM	Wired	8	1	919.30	64.40	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, June 03, 2019	11:34 AM	Wired	7	2	951.10	53.30	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, June 04, 2019	9:53 AM	Wired	7	1	532.20	63.80	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, June 04, 2019	12:13 PM	Wired	9	0	947.80	59.60	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, June 12, 2019	9:49 AM	Wired	8	1	942.00	64.20	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, June 15, 2019	6:39 PM	Wired	8	1	942.10	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, June 29, 2019	9:25 AM	Wired	7	2	721.90	64.00	Mediacom Communications	speedtest.mediacomtoday.com	
		Wired					Mediacom Communications	speedtest.mediacomtoday.com	
Friday, July 31, 2020	11:00 AM	Wired	35		111.48	0.25	Mediacom Communications	speedtest.net	
Friday, July 31, 2020	11:43 AM	Wired	17	3	224.00	61.80	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, July 31, 2020	2:14 PM	Wired	17	2	368.40	62.90	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, July 31, 2020	7:09 PM	Wired	17	2	221.10	61.10	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, July 31, 2020	9:05 PM	Wired	17	10	129.10	12.30	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 01, 2020	7:02 AM	Wired	17	1	260.80	58.50	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 01, 2020	11:14 AM	Wired	18	6	354.10	29.80	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 01, 2020	11:59 AM	Wired	12	3	486.30	56.00	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 01, 2020	8:26 PM	Wired	17	5	103.20	60.20	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 02, 2020	8:11 AM	Wired	17	3	212.10	47.30	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 02, 2020	10:53 AM	Wired	14	2	316.40	54.0	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 02, 2020	11:39 AM	Wired	21	10	182.20	58.20	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 02, 2020	4:39 PM	Wired	17	9	322.20	49.60	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 02, 2020	8:39 PM	Wired	18	3	195.10	64.70	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 03, 2020	7:11 AM	Wired	18	0	281.60	51.10	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 03, 2020	11:12 AM	Wired	16	2	395.40	43.80	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 03, 2020	5:09 PM	Wired	17	2	320.20	43.80	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 03, 2020	7:06 PM	Wired	14	2	392.10	35.00	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, August 04, 2020	9:39 AM	Wired	8	1	599.40	51.00	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, August 04, 2020	10:56 AM	Wired	8	2	785.60	51.10	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, August 04, 2020	1:32 PM	Wired	8	2	839.00	35.60	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, August 04, 2020	4:33 PM	Wired	7	1	807.80	30.00	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, August 04, 2020	8:32 PM	Wired	8	5	737.00	40.30	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, August 05, 2020	9:40 AM	Wired	8	1067	497.50	16.40	Mediacom Communications	speedtest.mediacomtoday.com	Mediacom Commu.mediacomtoday.com
Wednesday, August 05, 2020	11:00 AM	Wired	8	5	893.70	48.40	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, August 05, 2020	8:10 PM	Wired	8	1	763.10	60.80	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, August 06, 2020	9:10 AM	Wired	4	2	739.40	60.80	Mediacom Communications	speedtest.mediacomtoday.com	

Date	Time	Connection	Ping	Jitter	Download*	Upload*	Server	Program	* = Mbps
Thursday, August 06, 2020	9:29 AM	Wired	8	2	365.40	55.30	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, August 06, 2020	10:02 AM	Wired	8	1	698.80	58.20	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, August 07, 2020	9:17 AM	Wired	7	0	776.20	52.00	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, August 07, 2020	9:06 PM	Wired	8	2	741.20	36.70	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 08, 2020	8:39 AM	Wired	8	1	642.90	44.20	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 08, 2020	5:26 PM	Wired	8	2	631.80	61.70	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 09, 2020	10:34 AM	Wired	8	1	326.80	60.30	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 09, 2020	12:12 PM	Wired	8	5	547.50	51.50	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 16, 2020	8:57 AM	Wired	19	2	241.40	63.90	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 16, 2020	10:06 AM	Wired	20	1	294.70	62.30	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 16, 2020	2:46 PM	Wired	19	3	228.80	62.60	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 17, 2020	9:05 AM	Wired	19	3	219.40	47.80	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, August 19, 2020	11:33 AM	Wired	3	2	392.20	60.90	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, August 20, 2020	10:29 AM	Wired	8	5	302.40	50.70	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, August 20, 2020	12:06 PM	Wired	9	1	512.20	61.70	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, August 20, 2020	7:07 PM	Wired	9	5	383.90	43.00	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, August 21, 2020	9:20 AM	Wired	8	1	576.50	60.50	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 22, 2020	8:20 AM	Wired	8	2	625.80	60.60	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 22, 2020	9:49 PM	Wired	9	3	542.80	36.60	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 23, 2020	10:05 AM	Wired	5	2	400.40	56.70	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 23, 2020	6:47 PM	Wired	7	1	296.00	60.80	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 24, 2020	10:16 AM	Wired	5	1	567.30	60.60	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 24, 2020	5:22 PM	Wired	19	1	501.70	60.10	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, August 25, 2020	10:35 AM	Wired	20	0	249.00	60.20	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, August 25, 2020	1:13 PM	Wired	19	1	299.10	60.20	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, August 26, 2020	9:20 AM	Wired	19	2	207.80	46.80	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, August 26, 2020	1:29 PM	Wired	19	3	192.50	60.20	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, August 27, 2020	10:07 AM	Wired	18	1	467.40	60.30	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, August 28, 2020	8:37 AM	Wired	19	1	465.40	60.20	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 29, 2020	7:43 AM	Wired	20	3	257.20	60.20	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 29, 2020	11:04 AM	Wired	19	9	318.30	55.90	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 30, 2020	9:56 AM	Wired	18	1	397.80	61.90	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 31, 2020	5:17 AM	Wired	19	6	201.70	47.80	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 31, 2020	7:56 AM	Wired	19	2	424.40	60.10	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 31, 2020	1:44 PM	Wired	19	4	227.70	61.70	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, September 01, 2020	10:12 AM	Wired	20	49	239.80	63.40	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, September 01, 2020	10:38 AM	Wired	19	1	253.20	60.30	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, September 01, 2020	3:46 PM	Wired	20	3	275.90	56.40	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, September 02, 2020	8:11 AM	Wired	20	4	317.30	37.00	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, September 02, 2020	10:19 AM	Wired	19	1	284.40	60.50	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, September 02, 2020	11:06 AM	Wired	20	7	364.70	29.90	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, September 03, 2020	8:26 AM	Wired	19	2	405.60	62.00	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, September 03, 2020	10:52 AM	Wired	19	2	266.30	56.50	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, September 06, 2020	11:10 AM	Wired	19	2	373.20	52.40	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, July 03, 2021	9:33 AM	Wired	8	1	722.90	61.00	Mediacom Communications	speedtest.mediacomtoday.com	
		Wired					Mediacom Communications	speedtest.mediacomtoday.com	
		Wired					Mediacom Communications	speedtest.mediacomtoday.com	



Account Information

This statement reflects current charges as of the date the statement was printed.

Did you know?

Mediacom requires a minimum of 7 days advanced notification to terminate service and arrange for the return of all equipment. Failure to return our equipment will result in the following charges: Non-addressable converter up to \$125.00; addressable converter up to \$300.00; modem up to \$139.99; digital converter up to \$500.00; remote control up to \$85.00.

Statement of Service

Page 1 of 2

RAYMOND KNAPP

June 19, 2021

Account Number

8383970400168591

Account PIN

3817

Telephone Number

(515) 249-1899

For Service at

422 2ND ST
PERRY IA 50220-1903

How to reach us...

Online: support.mediacomcable.com to sign into your account.

App: Download **MediacomConnect** at iTunes Store or Google Play

Phone: Call us 24/7 at 1-855-633-4226 to pay using our automated system.

Local Office Address: 225 S Dayton Ave., Ames, IA 50010



Your Summary

Bill from 06/29/21 through 07/28/21

See the back for details

Previous Balance	\$135.43
Payments	-135.43
Bundled Services	131.99
Individual Services	0.00
Taxes and Fees	3.44
Amount Due	\$135.43
Amount Due By	Autopay

CREDIT CARD CHARGE WILL BE ON 07/09/21

Closed captioning: If you are experiencing issues with Closed Captioning, please contact Mediacom Customer Service at (855) 633-4226, fax (845) 698-4079 or visit our website at <http://mediacomtoday.com>. For written closed captioning complaints, contact: Penny Kurdyla, Mediacom Closed Captioning Office, 1 Mediacom Way, Mediacom Park, NY 10918, Phone (877) 647-6221, fax (845) 698-4079 or email closedcaption@mediacomcc.com.



2205 INGERSOLL DES MOINES IA 50312-5289

8383 9700 NO RP 19 06202021 YYYNYNN 01 000176 0001

RAYMOND KNAPP
422 2ND ST
PERRY IA 50220-1903

June 19, 2021

Account Number:

8383970400168591

RAYMOND KNAPP

422 2ND ST

PERRY IA 50220-1903

Amount Due By Autopay **\$135.43**

Amount you are enclosing: \$



MEDIACOM
PO BOX 5744
CAROL STREAM IL 60197-5744



838397040016859100135434



8383 9700 NO RP 19 06202021 YYYNYNN 01 000176 0001

RAYMOND KNAPP
Account Number
Telephone Number

Page 2 of 2
June 19, 2021
8383970400168591
(515) 249-1899

Your Account Details

06/19	Previous Balance	\$135.43
06/08	Credit Card Payment	-135.43
		\$0.00

Your Bundled Services

06/29 - 07/28	Comp Mkt Offer Yr 3 (01/19) - 4350 Year 3	131.99
	1 Gig Internet-6000 GB	109.99
	Modem/EMTA	0.00
	High Speed Modem	12.00
	* Mediacom Phone Service	10.00

Three year promotion. Year 3 bundle discount expires on 01/21/22. (PC)
Year 3 bundle discount amount: \$69.95

\$131.99

Taxes and Fees

Internet

06/19	Local Sales Tax	0.12
06/19	State Sales Tax	0.72

Phone

06/19	Regulatory Recovery Fee	0.18
06/19	Local Sales Tax	0.07
06/19	Local E911 Tax	1.00
06/19	Iowa Dual Party Relay	0.03
06/19	Federal Universal Service Fund	0.88
06/19	State Sales Tax	0.44
		\$3.44

Total Due By Autopay \$135.43

FOR COMPLAINTS REGARDING YOUR TELEPHONE SERVICE, YOU MAY REQUEST ASSISTANCE FROM THE IOWA UTILITIES BOARD BY WRITING 1375 E COURT AVENUE, ROOM 69, DES MOINES, IOWA 50319-0069, BY CALLING 515-725-7321 OR TOLL FREE 1-877-565-4450 OR EMAIL CUSTOMER@IUB.IOWA.GOV FCC COMMUNITY ID: IA0069

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- | | |
|---|---|
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| <input checked="" type="checkbox"/> Pay monthly bill | <input checked="" type="checkbox"/> Schedule service appointments |
| <input checked="" type="checkbox"/> Manage Auto Pay | <input checked="" type="checkbox"/> Manage WiFi service |

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MAIL:

Return this payment stub with your check or money order made **payable to Mediacom**.

Minburn Telephone Company

Challenge – Perry Rural

Other Supporting Documentation

Perry Rural Broadband Expansion

Empower Rural Iowa Broadband Grants
Program

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T9 P1

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- Personalized Customer Care

- Consistently Reliable Internet
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- Professional Installation
- Family Owned and Operated
- Router Service Plans Available



Minburn Telephone Company

Challenge

Perry Rural

Perry Rural Broadband Expansion

Empower Rural Iowa Broadband
Grants Program

Minburn Telephone Company – OCIO NOFA #006 Census Block Eligibility Challenge
Perry Rural

Minburn Telephone Company (Minburn) respectfully requests to challenge the census blocks included in this filing, which are also included in its NOFA #006 OCIO Broadband Grant, Perry Rural. The identified census blocks are currently being reflected as served on the Broadband Availability Map V4; however, it has been determined through the completion of thorough due diligence by Minburn's staff and supported by consumers in the specified areas that the claimed level of broadband service is widely overstated by the service providers.

Minburn is challenging each of the service providers claiming to provide broadband in the census blocks reflected in this challenge. In addition to Bits of Technology Wireless Internet, Mediacom, CenturyLink and Windstream are also claiming to provide broadband services in the area with each covering less than 5% and 48%, respectively. As reflected in the residential affidavits obtained, the service offered by each provider is not at the speeds being claimed.

The following supporting documentation for this challenge has been broken out into five sections: 1) Dallas County Information; 2) Perry Rural Research; 3) Bits of Technology Wireless Internet Challenge; 4) Residential Affidavits; and 5) Other Supporting Documentation.

Dallas County Information

Information found in this section was provided by HR Green and the Greater Des Moines Partnership. The images depict the results from a May 2021 survey of residents and businesses throughout central Iowa. The survey responses presented here highlight the current gaps in broadband availability, speed/performance, reliability, and affordability in Dallas County.

Perry Rural Research

This section contains information that was provided by CheckPoint Solutions via data collected from Minburn's the crowd sourcing tool. The CheckPoint Solutions platform is used by providers to mine data on current broadband availability such as speed tests of existing connections as well as gathers demand generation of interest. The research offers a graphical representation of the speed tests completed in the challenge area that supports the challenge form.

Bits of Technology Wireless Internet Challenge

This narrative represents an analysis conducted within the past 60 days as to the current service providers, specifically Bits of Technology Wireless Internet (BTWI), and their current marketing and service offering claims. Findings offer technical arguments to explain why BTWIs current offerings are overstated.

Residential Affidavits

The residential affidavits included in this section are signed and notarized by consumers in the challenge area stating broadband service is unable to be provided at the speeds being claimed by the current providers which include, but are not limited to, BTWI, Mediacom, CenturyLink, and Windstream.

To further support our position, Minburn is sharing an unsolicited video recorded by a resident. He posted the video on a community board to encourage and educate his neighbors of the struggles of finding reliable broadband service. The video can be viewed at: <https://youtu.be/D1fVYrWnR0> .

Other Supporting Documentation

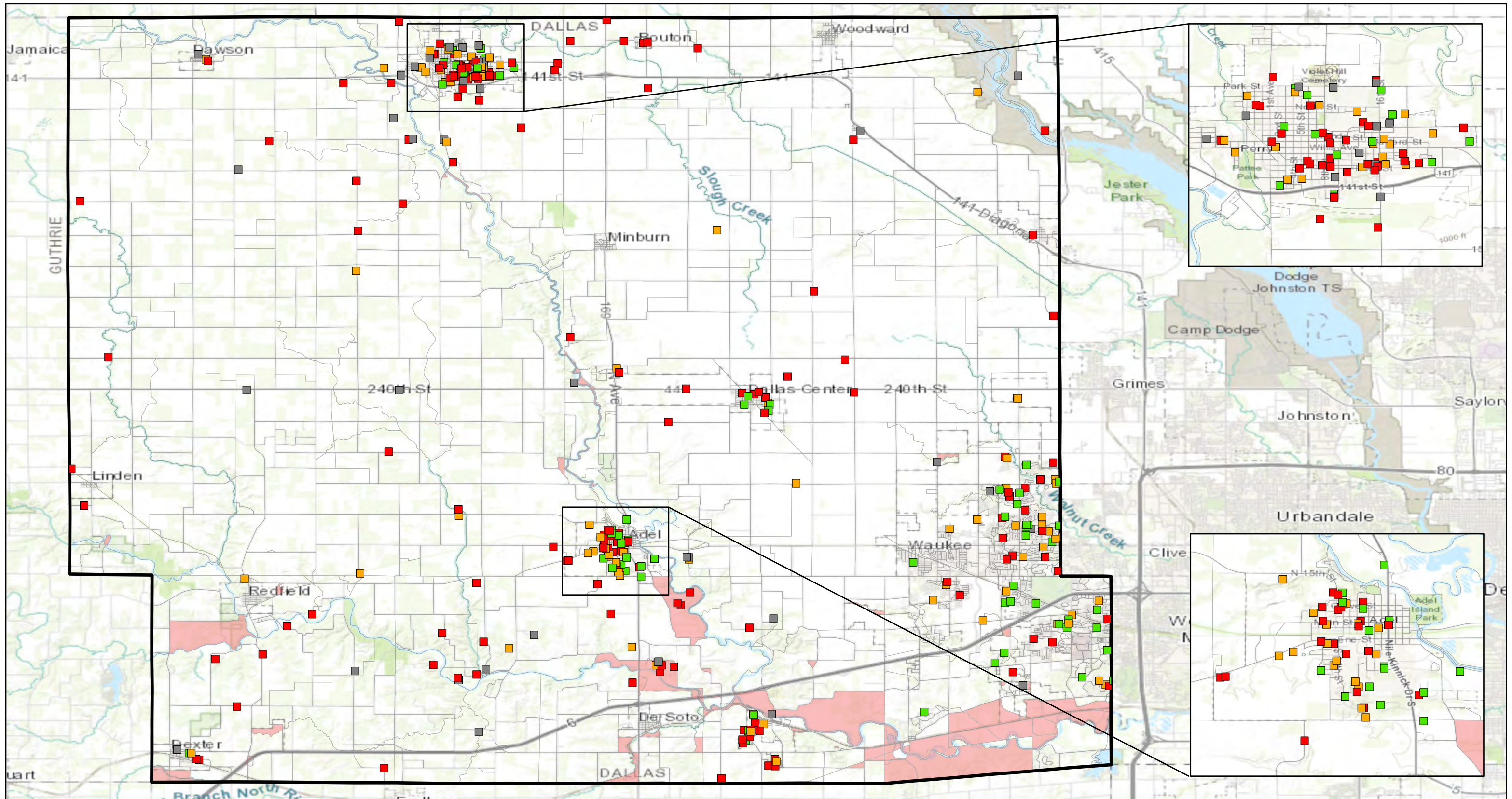
The final supporting documentation contains a direct mail postcard advertisement received by a consumer residing within the challenge area of Perry. The postcard was sent via USPS by Bits of Technology Wireless Internet (BTWI). As shown, the postcard message offers **UP TO 30 Mbps**; however, this speed is significantly less than what BTWI has claimed they are able to deliver per the Broadband Availability Map V4.

Minburn Telephone Company

Challenge – Perry Rural Dallas County Information

Perry Rural Broadband Expansion

Empower Rural Iowa Broadband Grants
Program



Residential Survey Results Internet Download Speed

Dallas County
Iowa

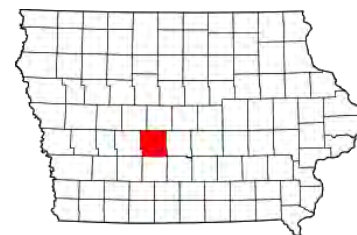
Legend

Internet Download Speed (in Mbps):

- Unserved (<25)
- Underserved (25-100)
- Well-Served (>100)
- No Speed Test Data

Iowa Broadband Availability

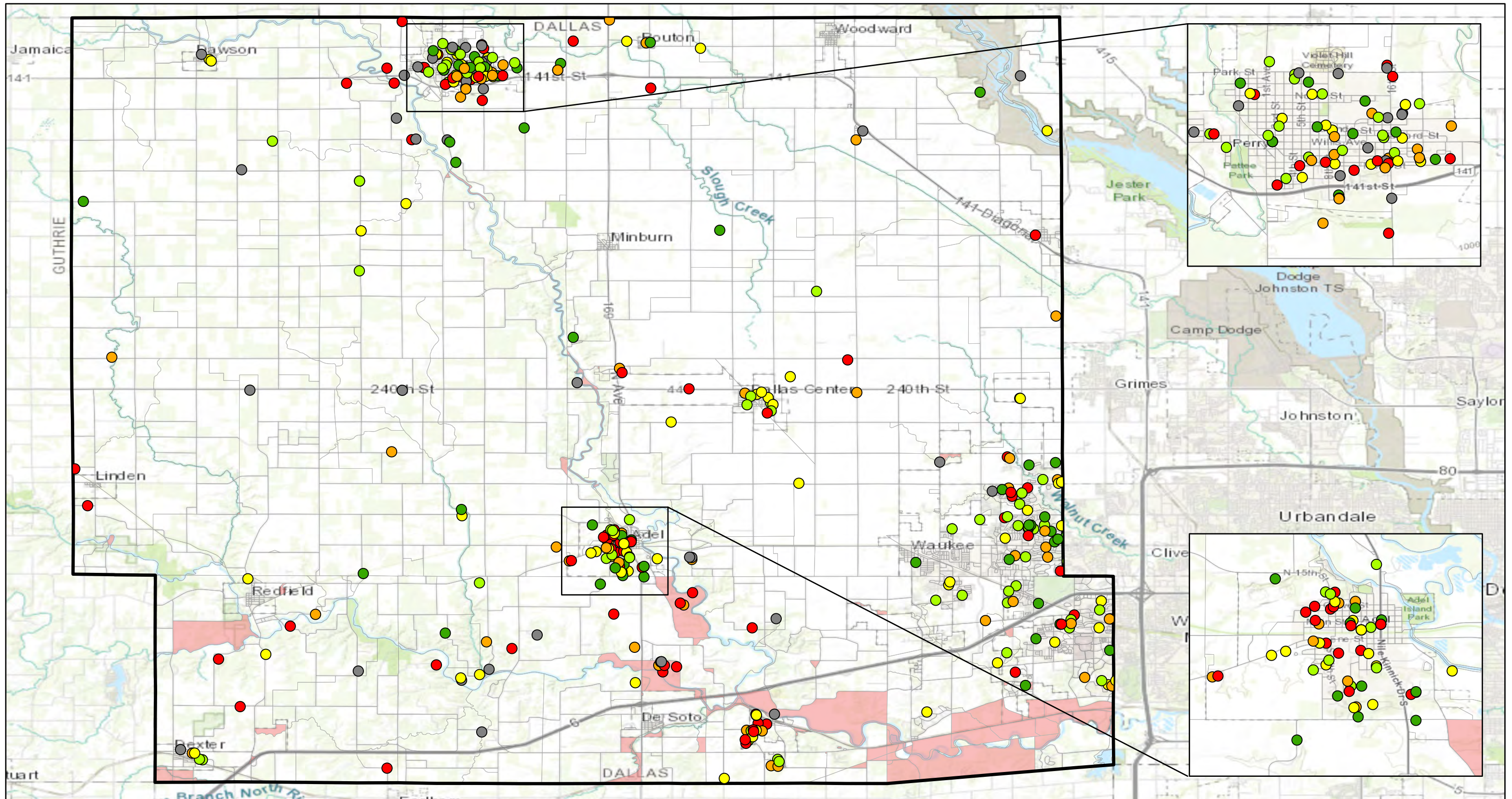
- Targeted Service Area
- Broadband Available



Miles

1 inch equals 3 miles





Residential Survey Results

Speed & Data Rate Satisfaction

Dallas County
Iowa

Legend

Speed/Data Rate Satisfaction

- 1-Very Dissatisfied
- 2-Somewhat Dissatisfied
- 3-It's OK
- 4-Somewhat Satisfied
- 5-Very Satisfied
- No Response

Iowa Broadband Availability

- Targeted Service Area
- Broadband Available

01.536

Miles

1 inch equals 3 miles

Minburn Telephone Company

Challenge – Perry Rural Perry Rural Research

Perry Rural Broadband Expansion

Empower Rural Iowa Broadband Grants
Program

Minburn Perry Rural By Underserved/Speed



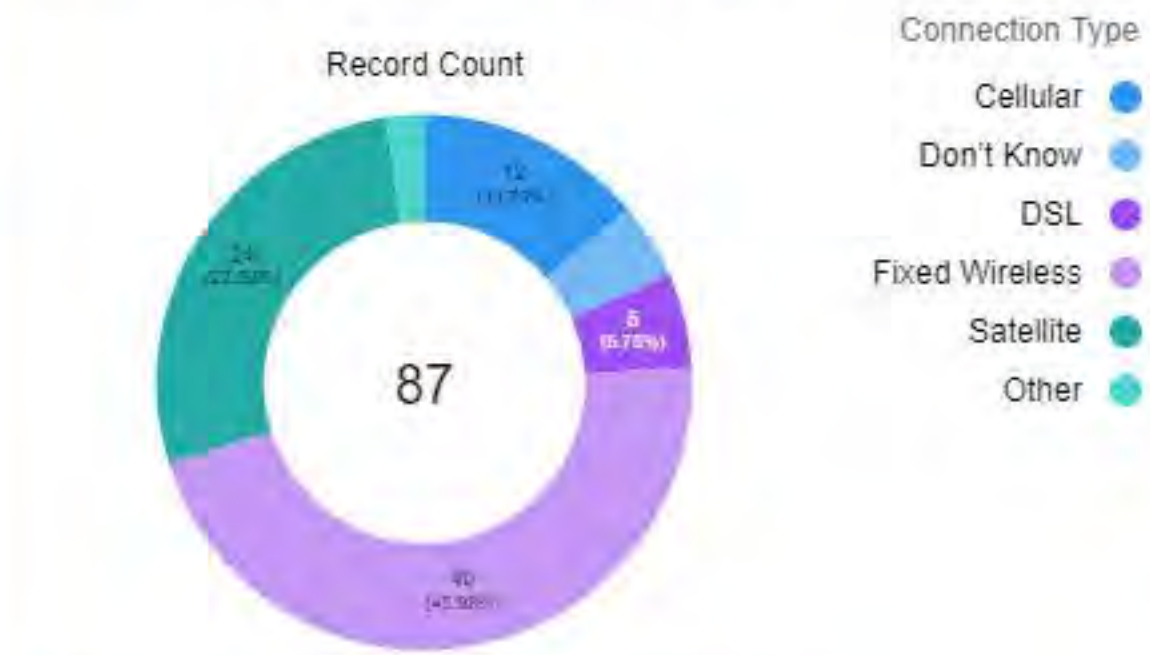
[View Report \(Minburn Perry Rural By Underserved/Speed\)](#)

Minburn Perry Rural By Underserved/Speed



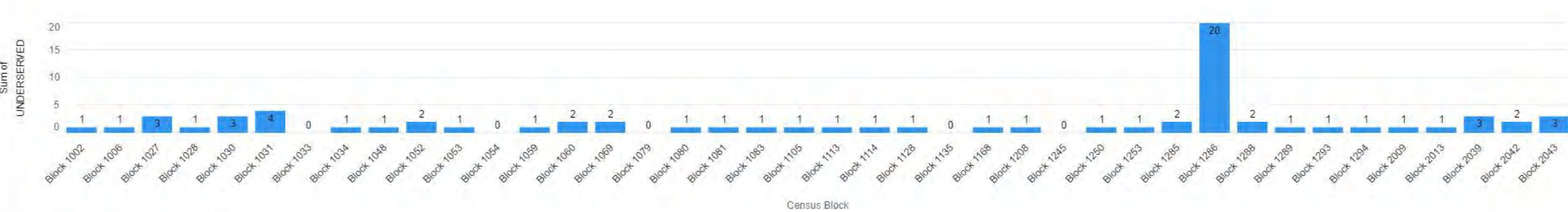
[View Report \(Minburn Perry Rural By Underserved/Speed\)](#)

Minburn Perry Rural By Connection Type



[View Report \(Minburn Perry Rural By Type/Underserved\)](#)

Minburn Perry Rural by Census Block



[View Report \(Minburn Perry Rural by Census Block\)](#)

Minburn Perry Rural Total

As of 2021-07-16 09:54:34 Pacific Standard Time/PST • Generated by Chkpt Minburn

Filtered By

Show: All service order

Challenge/Application equals Minburn Perry Rural

Upload Speed not equal to

Census Block ↑	Service Address	Challenge/Application	Speeds Currently Subscribed to	UNDERSERVE	Upload Speed	Download Speed	Connection Type
Block 1002	12619 HOUSTON AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	3	12	Fixed Wireless
Subtotal	Sum Count	1		1			
Block 1006	15925 130TH ST DAWSON	Minburn Perry Rural	80 Mb +	TRUE	25	75	Cellular
Subtotal	Sum Count	1		1			
Block 1027	18323 160TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	22	0	Cellular
	18317 160TH ST PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	1	36	Satellite
	15292 HULL AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	0	0	Cellular
Subtotal	Sum Count	3		3			
Block 1028	16933 142ND PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	12	2	Satellite
Subtotal	Sum Count	1		1			
Block 1030	17187 160TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	8	8	Fixed Wireless
	14976 H AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	33	3	Fixed Wireless
	14976 H AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	15	30	Satellite
Subtotal	Sum Count	3		3			
Block 1031	14405 H AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	1	1	DSL
	14157 GREEN DR PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	19	7	Fixed Wireless
	14106 GREEN DR PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	19	57	Fixed Wireless
	14405 H AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	15	38	Cellular
Subtotal	Sum Count	4		4			
Block 1033	15871 141ST ST PERRY	Minburn Perry Rural	Under 25 Mb		Don't Know	Don't Know	Satellite
	15244 130TH ST DAWSON	Minburn Perry Rural	25 Mb - 80 Mb		Don't Know	Don't Know	Satellite
Subtotal	Sum Count	2		0			
Block 1034	13850 130TH STREET DAWSON	Minburn Perry Rural	Under 25 Mb	TRUE	20	9	Satellite
Subtotal	Sum Count	1		1			
Block 1048	16174 150TH ST PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	15	40	Satellite
Subtotal	Sum Count	1		1			
Block 1052	16954 KILLAREN DR PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	1	23	Fixed Wireless
	16954 KILLAREN DR PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	1	23	Fixed Wireless
Subtotal	Sum Count	2		2			
Block 1053	18927 170TH ST PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	0	0	Fixed Wireless
Subtotal	Sum Count	1		1			
Block 1054	19559 180TH ST PERRY	Minburn Perry Rural	Under 25 Mb	FALSE	52	108	Fixed Wireless
Subtotal	Sum Count	1		0			
Block 1059	15043 K AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	0	0	Fixed Wireless
Subtotal	Sum Count	1		1			
Block 1060	15628 K AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	1	1	Cellular
	15336 K AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	FALSE	27	27	Satellite
	15621 L AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	1	3	Cellular
	20815 170TH ST PERRY	Minburn Perry Rural		FALSE	15.3	3.59	Don't Know
Subtotal	Sum Count	4		2			
Block 1069	18010 180TH LN PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	11	10	Satellite
	18308 180TH LN PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	2	1	Cellular
Subtotal	Sum Count	2		2			
Block 1079	16285 190TH ST PERRY	Minburn Perry Rural	Under 25 Mb		Don't Know	Don't Know	Cellular
Subtotal	Sum Count	1		0			
Block 1080	16359 180TH ST PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	0	24	Satellite
Subtotal	Sum Count	1		1			
Block 1081	17833 G AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	0	8	Satellite
Subtotal	Sum Count	1		1			
Block 1083	14115 170TH ST DAWSON	Minburn Perry Rural	Under 25 Mb	TRUE	21	0	Satellite
Subtotal	Sum Count	1		1			
Block 1105	19137 F AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	16	101	Fixed Wireless
Subtotal	Sum Count	1		1			
Block 1113	16140 190TH ST PERRY	Minburn Perry Rural	25 Mb - 80 Mb	FALSE	257	53	Fixed Wireless
	19077 H AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	18	30	Cellular
Subtotal	Sum Count	2		1			
Block 1114	19314 H AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	0	0	Fixed Wireless
Subtotal	Sum Count	1		1			
Block 1128	15999 220TH ST MINBURN	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	0	0	None
Subtotal	Sum Count	1		1			
Block 1135	16373 230TH ST MINBURN	Minburn Perry Rural	Under 25 Mb		Don't Know	Don't Know	Fixed Wireless
Subtotal	Sum Count	1		0			
Block 1168	16347 240TH ST MINBURN	Minburn Perry Rural	Under 25 Mb	TRUE	8	16	Fixed Wireless

Subtotal	Sum Count				1			
Block 1208		16822 142ND PL PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	12	51	Fixed Wireless
Subtotal	Sum Count				1			
Block 1245		2222 G AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb		Don't Know	Don't Know	Fixed Wireless
Subtotal	Sum Count				0			
Block 1250		2160 CLOVER AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	FALSE	26	30	Cellular
		2176 D AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	8	12	Cellular
Subtotal	Sum Count				1			
Block 1253		197 325TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	22	18	Cellular
		135 325TH ST PERRY	Minburn Perry Rural	Under 25 Mb		Don't Know	Don't Know	Satellite
Subtotal	Sum Count				1			
Block 1285		396 329TH PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	10	6	Fixed Wireless
		362 332ND PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	15	38	Satellite
Subtotal	Sum Count				2			
Block 1286		2290 DERI PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	3	4	Fixed Wireless
		361 332ND PL PERRY	Minburn Perry Rural	80 Mb +	TRUE	17	26	Satellite
		357 330TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	3	22	Fixed Wireless
		364 332ND PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	5	13	Fixed Wireless
		366 332ND PL PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	5	24	Satellite
		364 332ND PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	4	14	Fixed Wireless
		353 332ND PL PERRY	Minburn Perry Rural	Under 25 Mb	FALSE	69	156	Satellite
		353 330TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	6	12	Fixed Wireless
		373 335TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	7	1	Satellite
		354 332ND PL PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	0	9	DSL
		2285 DERI PL PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	25	31	Fixed Wireless
		2296 DEVIN PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	5	19	Fixed Wireless
		349 330TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	12	7	Satellite
		2289 DERI PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	8	0	Fixed Wireless
		2298 DEVIN PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	19	54	Fixed Wireless
		343 330TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	7.7	24	Fixed Wireless
		2285 DERI PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	1	17	Fixed Wireless
		355 332ND PL PERRY	Minburn Perry Rural		FALSE	41	15	Don't Know
		351 332ND PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	0	0	None
		356 332ND PL PERRY	Minburn Perry Rural	Under 25 Mb	FALSE	51	71	Fixed Wireless
		2288 DERI PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	4	21	Fixed Wireless
		369 332ND PL PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	13	14	Satellite
		369 335TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	16	26	Satellite
Subtotal	Sum Count				20			
Block 1288		2347 D AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	29	1	Fixed Wireless
		258 330TH ST PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	24	14	Fixed Wireless
Subtotal	Sum Count				2			
Block 1289		2288 C AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	8	18	Satellite
Subtotal	Sum Count				1			
Block 1293		2365 D AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	3	1	DSL
Subtotal	Sum Count				1			
Block 1294		2376 D AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	6	3	Fixed Wireless
Subtotal	Sum Count				1			
Block 2009		22603 130TH ST PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	1	12	DSL
Subtotal	Sum Count				1			
Block 2013		12360 K DR PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	0	1	DSL
Subtotal	Sum Count				1			
Block 2039		13260 M AVE PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	6	14	Fixed Wireless
		13773 N AVE BOUTON	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	15	61	Don't Know
		13277 N AVE BOUTON	Minburn Perry Rural	Under 25 Mb	TRUE	3	13	Fixed Wireless
Subtotal	Sum Count				3			
Block 2042		13401 M AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	13	29	Fixed Wireless
		13211 M AVE PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	23	25	Fixed Wireless
Subtotal	Sum Count				2			
Block 2043		13605 PARTRIDGE TRL PERRY	Minburn Perry Rural	Under 25 Mb		Don't Know	Don't Know	Satellite
		13768 PARTRIDGE TRL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	1	4	Fixed Wireless
		13682 L PL PERRY	Minburn Perry Rural	Under 25 Mb	TRUE	0	4	Satellite
		13542 PHEASANT LN PERRY	Minburn Perry Rural	25 Mb - 80 Mb	TRUE	18	6	Fixed Wireless
		13771 PARTRIDGE TRL PERRY	Minburn Perry Rural		FALSE	16	3	Don't Know
Subtotal	Sum Count				3			
Total	Sum Count				71			
		87						

Minburn Telephone Company

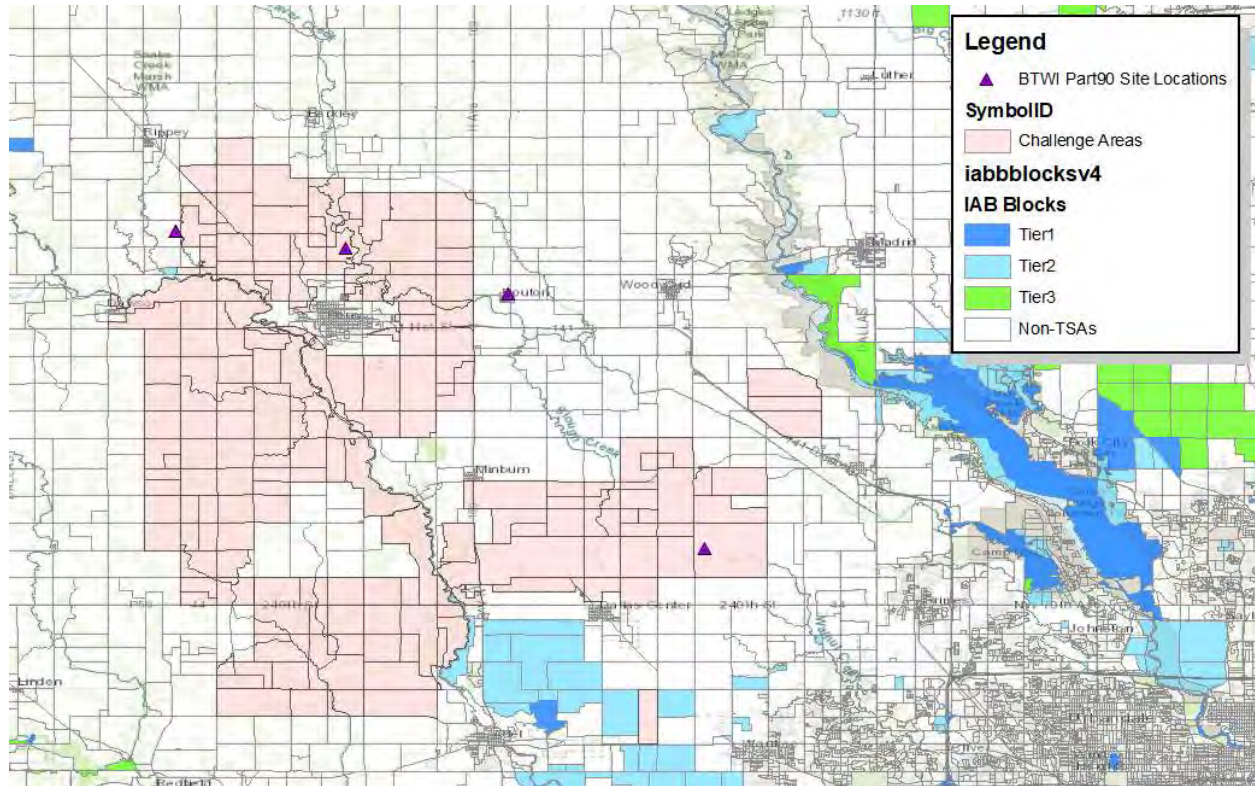
Challenge – Perry Rural Bits of Technology Wireless Internet Challenge

Perry Rural Broadband Expansion

Empower Rural Iowa Broadband Grants
Program

SECTION 3) Bits of Technology Wireless Internet, LLC Challenge

Bits of Technology Wireless Internet, LLC (BTWI) is listed as having advertised throughputs of 100/50Mbps (downlink/uplink, respectively) throughout the Census Blocks (CBs) that Minburn Telephone Company (Minburn) is presenting within this challenge, as shown below.



Through field validation at common Bouton site, Minburn documented that BTWI is utilizing equipment manufactured by Ubiquiti Networks (Ubiquiti) in the unlicensed 2.4GHz and 5.2/5.8GHz frequency bands, as well as the lightly-licensed, Part 90 frequency band.

For its unlicensed operations BTWI is utilizing Ubiquiti's LTU and Rocket 2AC Prism equipment. The manufacturer documentation for the Ubiquiti LTU equipment indicates for the maximum channel width of 50MHz is capable of achieving a maximum throughput of 600Mbps (aggregate, uplink and downlink). With a maximum of 600Mbps throughput, at the 100/50Mbps advertised speed tiers, if dedicated, BTWI would only be capable of servicing four to six subscribers¹ per LTU sector, assuming BTWI is able to secure an unencumbered 50MHz wide channel with the unlicensed 5GHz band.

The manufacturer documentation for the Ubiquiti Rocket 2AC Prism equipment indicates for the maximum channel width of 40MHz is capable of achieving a maximum throughput of 330Mbps (aggregate, uplink and downlink). With a maximum of 330Mbps throughput, at the 100/50Mbps advertised speed tiers, if dedicated, BTWI would only be capable of servicing two to three subscribers²

¹ Four subscribers if considering the aggregated throughput or six subscribers is considering only the downlink throughput.

² Two subscribers if considering the aggregated throughput or three subscribers is considering only the downlink throughput.

per Rocket 2AC Prism sector, assuming BTWI is able to secure an unencumbered 50MHz wide channel with the unlicensed 5GHz band.

BTWI is also utilizing its Nationwide Nonexclusive, Part 90 license (3650-3700MHz), under Call Sign WQOU655, to deliver service to the CBs that Minburn is challenging. In 2015, the FCC released its Part 96 ruleset (3550-3700MHz), which encapsulated the spectrum formerly licensed under its Part 90 ruleset. The FCC allowed existing operators to continue operating their Part 90 networks through October 17, 2020, or through the expiration of their license terms, whichever is longer. BTWI's license under Call Sign WQOU655 has a license expiration of February 3rd, 2022, at which time BTWI must transition its operations to follow the Part 96 ruleset or cease operations. Per the FCC's Universal Licensing System (ULS), BTWI has twelve site locations³ registered and each site location indicates that it utilizes equipment with the FCC ID of SWX-M365. FCC ID of SWX-M365 is Ubiquiti Networks (Ubiquiti) M365 product line and it is worth noting that the Ubiquiti's M365 product line has not received FCC type-acceptance for the operation under the Part 96 ruleset. The lack of FCC type-acceptance will require BTWI prior to February 3rd, 2022, to replace its Part 90 network with a Part 96-compliant manufacturer, equipment capable of operating on different frequency band or cease operations altogether.

With its unlicensed operations, its Part 90 license expiring on February 3rd, 2022, and the uncertainty created by its selected manufacturer, Minburn questions BTWI's viability to deliver a sustained, consistent 100/50Mbps service to the majority of the locations in the indicated rural CBs utilizing typical customer configurations and site loading considerations.

³ Per the FCC's definition each individual Part 90 sector needed to be registered and authorized by the FCC prior to operation, so in terms of the ULS a sector is equivalent to a site, although in industry-speak a site may be deployed supporting multiple sectors. In BTWI's case there are twelve sectors comprising 8 different site locations.





airMAX High Gain Variable Sector
Model Number: AM-V5G-TI
AM5G26459



Ubiquiti Networks, Inc. www.ubnt.com forum.ubnt.com wiki.ubnt.com





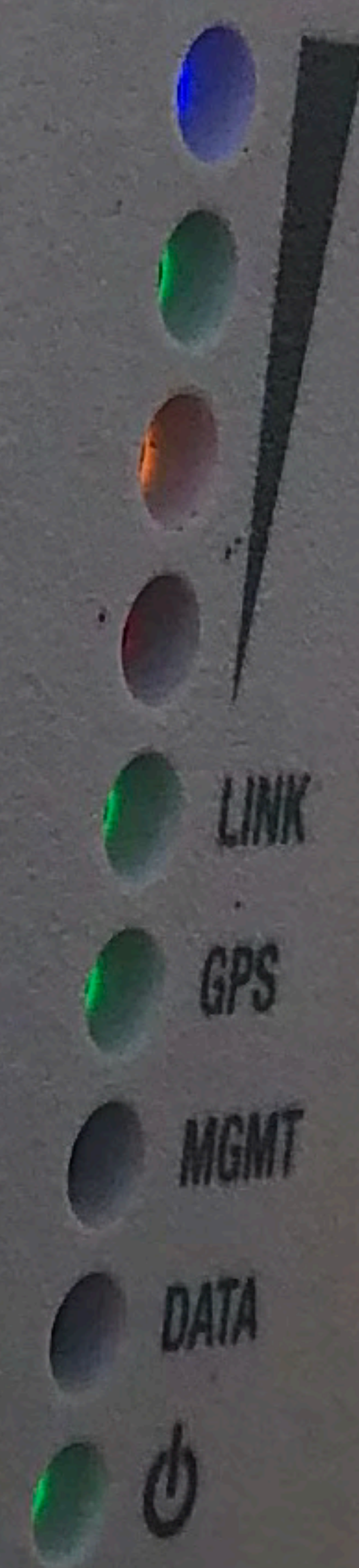












airFiber^{5X HD}













Minburn Telephone Company

Challenge – Perry Rural Affidavits

Perry Rural Broadband Expansion

Empower Rural Iowa Broadband Grants
Program

**Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309**

In the Matter of

Broadband Grants Program
Empower Rural Iowa

)
) NOFA #006
)
)

SWORN STATEMENT OF Eileen M. Splendore

I, **Eileen M. Splendore**, being of lawful age and duly sworn, state as follows:

1. My name is **Eileen M. Splendore**, my address is 18584 180th Street, Perry, IA 50220
2. At 12:54 P.M. on 7/16/21, I made an internet inquiring for Century Link Customer Service at <https://shop.centurylink.com/uas/>
3. The website informed me that they do not offer service to me at this time
4. This completes my Sworn Statement.

Eileen Splendore

Declarant

SWORN to and subscribed before me, this 16th day of July, 2021.



[Signature]
NOTARY PUBLIC

My Commission Expires:

8/20/2021

**Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309**

In the Matter of)
) NOFA #006
Broadband Grants Program)
Empower Rural Iowa)

SWORN STATEMENT OF Cindy Sohn

I, **Cindy Sohn**, being of lawful age and duly sworn, state as follows:

1. My name is **Cindy Sohn**.
2. At 9:25 A.M. on 7/16/2021, I contacted CenturyLink to inquire about getting internet service at my residence located at: 16841 142nd Place, Perry, Iowa 50220.
3. I made an internet inquiry for Century Link Customer Service at: <https://shop.centurylink.com/nc>
4. CenturyLink's website informed me that I do have a DSL residential service option available for internet with download speed up to 1.5 Mbps and upload speed up to 500 kbps for \$50/month.
5. This completes my Sworn Statement.


Declarant

SWORN to and subscribed before me, this 16th day of July, 2021.




NOTARY PUBLIC

My Commission Expires:

8/20/2021

**Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309**

In the Matter of)
) NOFA #006
Broadband Grants Program)
Empower Rural Iowa)

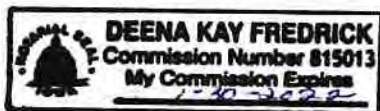
SWORN STATEMENT OF Daniel J. Spellman

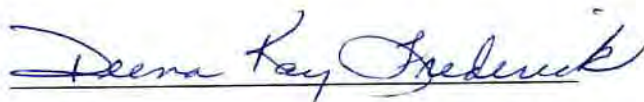
I, **Daniel J. Spellman**, being of lawful age and duly sworn, state as follows:

1. My name is **Daniel J. Spellman**.
2. At 12:38 P.M. on 7/13/2021, I called CenturyLink to inquire about getting internet service at 15292 Hull Avenue, Perry, Iowa 50220. I have attached my notes from my call with Trafar, CenturyLink Customer Care Agent.
3. I called Century Link Customer Service at (888) 856-2778.
4. I spoke with Trafar, CenturyLink's Customer Care Agent who informed me I have no residential service options for internet.
5. Trafar told me that Century Link doesn't offer service to me at this time and has no plans to extend service to our address but we could try a satellite provider not affiliated with their company.
6. The call ended at 12:55 P.M.
7. This completes my Sworn Statement.


Declarant

SWORN to and subscribed before me, this 13th day of July, 2021.





NOTARY PUBLIC

My Commission Expires:

1-30-2022

**Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309**

In the Matter of)
) NOFA #006
Broadband Grants Program)
Empower Rural Iowa)

SWORN STATEMENT OF

Cliff Fagen

I, Cliff Fagen, being of lawful age and duly sworn, state as follows:

1. My name is Cliff Fagen.
2. At 1:30 am/pm on 7/12/21 (date), I called BTWI (company name), to inquire about getting service at 351 332nd Place (address), Perry IA (city, state). I have attached my notes from my call with _____ (CSR name/title), and have labeled it "Attachment A."
3. I called the BTWI (company name) number 465-3043 (telephone number)
4. I spoke with Steve (CSR name) who informed me I have _____ residential service options:
 - 10M/___ M for \$ 55⁰⁰
 - 15M/___ M for \$ 65⁰⁰
5. (Additional notes) _____
6. The call ended at 2:00 am/pm.
7. This completes my Sworn Statement.

Cliff Fagen
Declarant

SWORN to and subscribed before me, this the 14th day of July, 2021.



Gina L. McLaughlin
NOTARY PUBLIC

My Commission Expires:

February 5, 2024

(Notary Stamp Above)

Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309

In the Matter of

Broadband Grants Program
Empower Rural Iowa

NOFA #006

SWORN STATEMENT OF Kent Scheib

I, Kent Scheib, being of lawful age and duly sworn, state as follows:

1. My name is Kent Scheib.
2. At 10:11 am/pm on 7/15/21 (date), I called Century Link (company name), to inquire about getting service at 16822 142nd Place (address), Perry, Iowa (city, state). I have attached my notes from my call with _____ (CSR name/title), and have labeled it "Attachment A."
3. I called the Century Link (company name) number 800-201-4099 (telephone number).
4. I spoke with Jackie (CSR name) who informed me I have 1 residential service options:
 - 1.5mb/500KB or
 M/ M for \$ 50
 - M/ M for \$ _____
5. (Additional notes) A.
6. The call ended at 10:25 am/pm.
7. This completes my Sworn Statement.

Kent Scheib
Declarant

SWORN to and subscribed before me, this the 15 day of July, 20 21.



(Notary Stamp Above)

[Signature]
NOTARY PUBLIC

My Commission Expires:

9/20/2021

**Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309**

In the Matter of)
) NOFA #006
Broadband Grants Program)
Empower Rural Iowa)

SWORN STATEMENT OF David A. Wambold

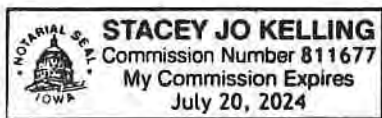
I, David A. Wambold, being of lawful age and duly sworn, state as follows:

1. My name is David A. Wambold.
2. At 2:31pm on 7/14/21(date), I called Minburn Communications(company name), to inquire about getting service at 24299 150th St.(address), Bouton, IA (city,state). I have attached my notes from my call with Gina McLaughlin, CSR (CSR name/title), and have labeled it "Attachment A."
3. I called the Minburn Communications(company name) number 515-438-2200(telephone number).
4. I spoke with Gina McLaughlin (CSR name) who informed me I have 3 residential service options:
 - 20M/1M for \$104.99
 - 15M/1M for \$84.99
 - 10M/1M for \$64.99
5. (Additional notes)
6. The call ended at 2:35pm.
7. This completes my Sworn Statement.

4.17/.86

David A. Wambold 7-15-21
Declarant

SWORN to and subscribed before me, this the 14th day of July, 2021.



(Notary Stamp Above)

Stacey Jo Kelling
NOTARY PUBLIC
My Commission Expires:
July 20, 2024

**Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309**

In the Matter of)
) NOFA #006
Broadband Grants Program)
Empower Rural Iowa)

SWORN STATEMENT OF Eric M. Ash

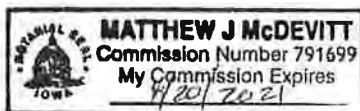
I, **Eric M. Ash**, being of lawful age and duly sworn, state as follows:

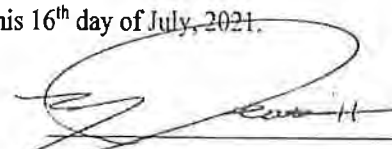
1. My name is **Eric M. Ash**.
2. At 9:02 ~~A~~M. on 7/16/2021, I contacted CenturyLink to inquire about getting internet service at my residence located at: 16933 142nd Place, Perry, Iowa 50220.
3. I made an internet inquiry Century Link Customer Service at: <https://shop.centurylink.com/nc>
4. CenturyLink's website informed me that I do have a DSL residential service option available for internet with download speed up to 1.5 Mbps and upload speed up to 500 kbps for \$50/month. Currently we pay \$75/month for up to 12.5 Mbps download from BTWI.
5. This completes my Sworn Statement.



Declarant

SWORN to and subscribed before me, this 16th day of July, 2021.





NOTARY PUBLIC

My Commission Expires:

8/20/2021

**Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309**

In the Matter of)
) NOFA #006
Broadband Grants Program)
Empower Rural Iowa)

SWORN STATEMENT OF John Cavanaugh

I, John Cavanaugh, being of lawful age and duly sworn, state as follows:

1. My name is John Cavanaugh.
2. At 9:24 AM on 7/12/21 (date), I called Bits of Technology Wireless Internet LLC (BTWI) (company name), to inquire about getting service at 396 329th Place (address), Perry, IA (city,state). I have attached my notes from my call with Billing Department (name not provided) and Steve (technician) (CSR name/title), and have labeled it "Attachment A."
3. I called the BTWI (company name) number 515-465-3043 (telephone number).
4. I spoke with Billing Department (name not provided) (CSR name) who informed me I have 5 or 6 residential service options:
 - 10M/3M for \$55
 - 15M/5M for \$65
 - 20M/6M for \$75
 - 30M/10M for \$85
 - 50M/16M for \$100
5. (Additional notes)

BTWI just upgraded speeds in the past few weeks. A new 100M/50M was just added, but I was told I likely don't qualify for this due to line of sight issues with the towers.
6. The call ended at 9:32 AM.
7. This completes my Sworn Statement.

Declarant

SWORN to and subscribed before me, this the 12th day of July, 2021.



Gina L. McLaughlin
NOTARY PUBLIC

My Commission Expires:

2/5/2024

(Notary Stamp Above)

ATTACHMENT A

PHONE CALL NOTES

I called BTWI at 515-465-3043 at 9:24 AM on 7/12/21. I was greeted by the Billing Department employee who did not provide her name. I told her I was an existing subscriber, and that I had both billing and technical questions. We covered the billing questions first, before I was transferred to a technical resource.

I asked about the recent speed increases and the pricing changes. She informed me no pricing changes had occurred. I was told each speed tier was increased by 60%. The current speed tiers are:

- 10M/3M for \$55
- 15M/5M for \$65
- 20M/6M for \$75
- 30M/10M for \$85
- 50M/16M for \$100
- 100M/50M with a quote for custom hardware and installation

Although the website has been updated to reflect the new plans, no official notice has been sent to customers as they are still evaluating the impact of the upgraded speeds on the network. They expect a notice will be sent to customers soon.

I spoke to Steve next regarding the technical issues. He has not received any new information on what the technician saw last week and the follow up they were going to have with the tower specialist. He said he would ask about this and call me back when he has more information.

BACKGROUND

I have been a BTWI internet subscriber since moving to Perry in 2017. For much of this period, I have subscribed to the top speed tier. As network engineer who works remotely instead of commuting into the Des Moines metro every day, reliable broadband internet is vital.

My roof was damaged in the derecho storm last year, and after having it replaced this spring, BTWI had to remount the antenna equipment. There were problems after this, but BTWI was quick to try to resolve the issue, even installing a new sector antenna at the tower to try to improve service. This has worked very well at the 30M/10M speed up until mid-June.

After calling BTWI, they confirmed that on 6/18/21 at 3:00 AM, my signal strength sharply dropped by 16db. The first call that I made somehow fell through the cracks, and no ticket was generated. After the July 4th weekend, I decided to follow up. Steve confirmed again the drop in signal strength, but

this time they had a technician come out within 30 minutes to troubleshoot the issue. After trying to adjust the antenna, the technician said that while the signal improved by 1-2db, they couldn't get back to the level they had before June. They are continuing to investigate this pending a follow up with their tower specialist.

Despite their recent increase on my plan from 30Mb/s to 50Mb/s, I am only achieving download speeds from 10-32Mb/s depending on the varying signal strength. The technician said if they can't get the signal improved that it may be best to drop to a lower speed tier like the 30M/10M due to match the real speed expectations between my location and the tower.

100M/50M PLAN

I was unaware of the speed increases by BTWI until I reviewed the OCIO broadband map to determine why our "Targeted Service Area" didn't qualify for NOFA #006 broadband grant funds. I see that most of our rural area is disqualified by the 100Mb/s plan offered by BTWI.

I commend BTWI for their efforts to improve connectivity in rural Iowa. I have appreciated their speed to resolve issues and the personal service offered by their staff. However, I would strongly urge that their 100Mb/s service not be considered generally available for the following reasons:

- I was told that while the 100M plan is now on their price sheet, no residential customers have it currently. I was told they will be having a meeting this week to discuss deployment details.
- The service requires custom hardware and installation that requires a quote. This is comparable to the more costly and customized business tier services they provide. The price is undefined, which makes it hard to compare to other residential broadband options.
- I believe the service is delivered using unlicensed spectrum (2.4Ghz or 5Ghz). This overlaps with consumer grade wireless equipment. This invites interference which can negatively affect service quality. It could be unfair to compare it with dedicated LTE spectrum or dedicated fiber or copper infrastructure.
- I was told that with my line of sight issues, I would likely be unable to take advantage of the service myself. I am just one example, but I think this illustrates the varied reach and quality of fixed wireless solutions. This makes it easier to overestimate homes passed when compared to dedicated copper or fiber infrastructure, which is much easier to quantify.

REFERENCES

BTWI Plans - <https://btwi.net/#plans>

BTWI Extended Price Sheet - <https://btwi.net/pricing>

**Before the
Office of the Chief Information Officer of the State of Iowa
Des Moines, IA 50309**

In the Matter of)
) NOFA #006
Broadband Grants Program)
Empower Rural Iowa)

SWORN STATEMENT OF Raymond L Knapp, Jr

I, Raymond L Knapp, Jr, being of lawful age and duly sworn, state as follows:

1. My name is Raymond L Knapp, Jr.
2. At _____ am/pm on _____ (date), I called medicom (see attached) (company name), to inquire about getting service at _____ (address), _____ (city, state). I have attached my notes from my call with _____ (CSR name/title), and have labeled it "Attachment A."
3. I called the _____ (company name) number _____ (telephone number).
4. I spoke with _____ (CSR name) who informed me I have _____ residential service options:
 - M/ M for \$
 - M/ M for \$
5. (Additional notes) _____
6. The call ended at _____ am/pm.
7. This completes my Sworn Statement.

Raymond L Knapp, Jr
Declarant

SWORN to and subscribed before me, this the 15th day of July, 2021.



(Notary Stamp Above)

Gina L McLaughlin
NOTARY PUBLIC

My Commission Expires:

February 5, 2024

414 2nd St
Perry, IA 50220

Internet history here at this address.

The first internet service I had was PrairieNet service that was over the air service. This service was relatively good for the time but the service degraded because trees matured, they caused interference between my house antenna and the water tower source. I had find a new service.

I had CenturyLink phone service in my part of town. The only problem was that the infrastructure was so old that the copper wire insulation was deteriorating to the point there was a lot of noise on the lines. The tech had to keep finding wire pairs without marker wires to provide good phone service.

I made the jump to CenturyLink internet but it was never very fast and my job in Des Moines needed me to have good service. I needed faster speeds so I jumped to a bonded pair of wires and was to have 20 meg speed. This service was not reached at most it was 10 meg. I put up with this service for years and was never pleased with the service. CenturyLink never felt the upgrading of the infrastructure was worth their time and money. They also used shady advertising by saying they had installed fiber service. They installed fiber to feed the copper that was the weakest link they had. Time to change.

Mediacom was the only solution. BTWI Wireless Internet was not useful because of the trees between my location and their towers. I first went with the 20 meg service from Mediacom for several month and it work ok but was subject to outages. Then they offered us 1 gig service at the same price so we took that option.

I have attached an excel spreadsheet that shows the actual speeds over several years. This was also accompanied by a under par service customer service.

The other major issue I have is none of the services a backup for their internet feed. We have had several times that construction workers have hit lines feeding Perry and taken out all internet and phones. I am in the process of creating a business web site and I am going to need to have a dependable system for that system.

My background is I am a retired computer programmer.

I have visited with some of the business users in Perry, IA and found that Minburn Communications has developed a very dependable fiber system. Several of the companies had dropped their backup internet service because Minburn fiber was so dependable.

I feel that Perry Iowa is an underserved in it communications to the outside area and needs to have more competition that would improve all of the services provided to the citizens of the community.

Raymond L Knapp, Jr

K & H Bee Farm, LLC
(515) 249-1899

Date	Time	Connection	Ping	Jitter	Download*	Upload*	Server	Program	* = Mbps
Tuesday, January 29, 2019	7:38 PM	Wired	16		78.43	10.90	State of Iowa	speedtest.net	
Tuesday, January 29, 2019	7:42 PM	wired	26		587.17	14.80	State of Iowa	speedtest.net	
Tuesday, January 29, 2019	7:45 PM	Wired	8	2	935.10	7.50	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, January 29, 2019	7:49 PM	Wired	8	1	939.60	10.80	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, January 30, 2019	5:23 AM	Wired	8	1	939.50	19.70	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, January 30, 2019	5:26 AM	Wired	33		224.77	13.82	State of Iowa	speedtest.net	
Wednesday, January 30, 2019	11:31 AM	Wired	8	1	936.30	13.40	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, January 31, 2019	12:33 PM	Wired	7	2	957.90	64.30	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, February 01, 2019	1:12 PM	Wired	17	2	958.70	64.40	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, February 05, 2019	10:05 AM	Wired	9	1	942.10	61.20	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, February 05, 2019	5:21 PM	Wired	8	2	955.30	61.80	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, February 05, 2019	7:54 PM	Wired	9	1	854.80	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, February 07, 2019	10:53 PM	Wired	8	2	962.20	62.90	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, February 08, 2019	10:37 AM	Wired	8	1	945.60	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, February 10, 2019	10:35 AM	Wired	15	4	946.60	64.30	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, February 13, 2019	2:40 PM	Wired	7	2	964.30	63.20	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, February 25, 2019	11:12 AM	Wired	9	1	941.20	62.20	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, March 05, 2019	7:46 PM	Wired	7	1	935.70	7.00	Mediacom Communications	speedtest.mediacomtoday.com	Reported problems service call scheduled
Wednesday, March 06, 2019	2:52 PM	Wired	8	1	947.40	7.10	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, March 08, 2019	2:03 PM	Wired	9	13	967.00	11.30	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, March 08, 2019	2:06 PM	Wired	8	6	980.50	10.20	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, March 09, 2019	11:47 AM	Wired	8	49	939.50	6.20	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, March 10, 2019	11:31 AM	Wired	8	1	967.40	9.90	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, March 11, 2019	8:31 AM	Wired	7	2	941.80	6.30	Mediacom Communications	speedtest.mediacomtoday.com	Teck was hear
Monday, March 11, 2019	8:55 PM	Wired	9	1	939.50	60.60	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, March 11, 2019	8:57 PM	Wired	5	4	942.50	60.30	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, March 12, 2019	6:41 AM	Wired	7	5	939.00	63.30	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, March 13, 2019	9:26 AM	Wired	7	1	935.50	62.70	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, March 14, 2019	4:26 PM	Wired	6	4	949.50	61.00	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, March 16, 2019	10:11 AM	Wired	21	3	883.50	60.60	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, March 18, 2019	8:43 PM	Wired	6	2	835.80	63.90	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, March 22, 2019	9:46 AM	Wired	8	1	690.10	62.60	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, March 22, 2019	9:47 AM	Wired	8	1	549.70	64.50	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, March 22, 2019	11:00 PM	Wired	7	1	641.20	61.50	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, March 23, 2019	9:39 AM	Wired	8	2	800.80	64.00	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, February 25, 2019	12:56 PM	Wired	5	4	641.80	63.70	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, March 27, 2019	10:42 AM	Wired	8	2	505.40	63.80	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, March 28, 2019	11:48 AM	Wired	9	4	552.50	61.90	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, March 30, 2019	5:03 PM	Wired	8	1	605.20	61.80	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, March 31, 2019	1:38 PM	Wired	7	2	500.40	62.60	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, April 03, 2019	9:01 AM	Wired	7	3	511.30	62.10	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, April 05, 2019	1:11 PM	Wired	6	3	536.90	62.90	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, April 06, 2019	6:20 PM	Wired	7	1	938.10	63.90	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, April 08, 2019	6:11 PM	Wired	7	1	953.00	5.40	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, April 08, 2019	6:20 PM	Wired	5	49	958.10	5.00	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, April 09, 2019	10:18 AM	Wired	7	1	737.20	63.90	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, April 11, 2019	8:24 AM	Wired	6	2	487.60	63.50	Mediacom Communications	speedtest.mediacomtoday.com	

Date	Time	Connection	Ping	Jitter	Download*	Upload*	Server	Program	* = Mbps
Friday, April 12, 2019	4:39 PM	Wired	7	1	369.00	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, April 13, 2019	3:08 PM	Wired	7	3	496.30	0.70	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, April 13, 2019	3:17 PM	Wired	7	3	634.90	3.10	Mediacom Communications	speedtest.mediacomtoday.com	Made call to re Sam restar 23 min call
Sunday, April 14, 2019	9:58 AM	Wired	7	24	387.50	62.90	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, April 14, 2019	10:35 PM	Wired	7	2	488.90	62.10	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, April 15, 2019	9:07 AM	Wired	8	2	450.30	9.30	Mediacom Communications	speedtest.mediacomtoday.com	Teck took off filter and checked wires
Monday, April 15, 2019	2:40 PM	Wired	7	72	490.40	2.40	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, April 16, 2019	8:42 AM	Wired	7	1	386.20	63.80	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, April 17, 2019	7:45 AM	Wired	6	1	519.80	63.50	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, April 18, 2019	2:54 PM	Wired	7	3	601.30	63.80	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, April 18, 2019	4:31 PM	Wired	8	1	717.00	62.70	Mediacom Communications	speedtest.mediacomtoday.com	Call to say it was not improved.
Friday, April 19, 2019	8:57 AM	Wired	8	1	722.80	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, April 20, 2019	7:29 AM	Wired	8	1	657.60	56.90	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, April 21, 2019	10:45 PM	Wired	7	1	589.10	42.30	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, April 21, 2019	10:46 PM	Wired	6	3	558.90	38.50	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, April 22, 2019	11:06 AM	Wired	8	1	607.40	55.30	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, April 24, 2019	7:56 AM	Wired	7	1	667.90	63.50	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, April 24, 2019	5:00 PM	Wired					Mediacom Communications	speedtest.mediacomtoday.com	System Down
Wednesday, April 24, 2019	6:44 PM	Wired					Mediacom Communications	speedtest.mediacomtoday.com	System down
Wednesday, April 24, 2019	10:00 PM	Wired					Mediacom Communications	speedtest.mediacomtoday.com	System back up
Thursday, April 25, 2019	12:17 PM	Wired	7	1	963.80	63.40	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, April 25, 2019	4:44 PM	Wired	7	3	967.10	63.40	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, April 27, 2019	9:12 AM	Wired	7	1	708.00	63.40	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, April 28, 2019	4:57 PM	Wired	4	2	966.20	62.70	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, April 28, 2019	9:17 PM	Wired	8	2	791.80	59.70	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, April 28, 2018	9:21 PM	Wired	8	2	666.80	60.50	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, April 29, 2019	7:30 AM	Wired					Mediacom Communications	speedtest.mediacomtoday.com	Down at 6. Rebooted and was up and went down again
Monday, April 29, 2019	10:44 AM	Wired	7	2	944.20	62.90	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, April 29, 2019	3:16 PM	Wired	7	2	904.30	62.50	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, April 30, 2019	9:19 AM	Wired	7	2	917.20	62.80	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, April 30, 2019	10:30 AM	Wired					Mediacom Communications	speedtest.mediacomtoday.com	Outage up at 12:30 P
Thursday, May 02, 2019	9:18 AM	Wired	7	2	686.60	64.00	Mediacom Communications	speedtest.mediacomtoday.com	Rain the past 24 hours
Saturday, May 04, 2019	12:27 PM	Wired	7	3	944.60	64.40	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, May 05, 2019	8:03 AM	Wired	7	1	948.80	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, May 07, 2019	10:06 AM	Wired	15	1	934.80	63.80	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, May 08, 2019	12:01 PM	Wired	15	1	941.80	65.80	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, May 09, 2019	2:30 PM	Wired	7	1	943.80	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, May 11, 2019	9:15 AM	Wired	15	2	932.40	63.10	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, May 12, 2019	12:51 PM	Wired	14	4	933.60	58.80	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, May 13, 2019	7:16 PM	Wired	7	1	960.20	63.30	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, May 14, 2019	12:01 PM	Wired	7	0	967.00	63.80	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, May 15, 2019	10:17 AM	Wired	7	4	926.10	61.70	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, May 17, 2019	10:13 AM	Wired	9	1	635.10	63.20	Mediacom Communications	speedtest.mediacomtoday.com	Bad storms last night
Saturday, May 18, 2019	11:40 AM	Wired	7	1	942.80	51.90	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, May 19, 2019	10:08 AM	Wired	7	1	943.30	63.70	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, May 20, 2019	7:10 PM	Wired	7	2	947.10	55.50	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, May 22, 2019	8:36 AM	Wired	9	1	659.90	54.90	Mediacom Communications	speedtest.mediacomtoday.com	Rain last night

Date	Time	Connection	Ping	Jitter	Download*	Upload*	Server	Program	* = Mbps
Wednesday, May 22, 2019	8:50 AM	Wired	6	1	942.10	59.80	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, May 24, 2019	9:12 AM	Wired	7	1	664.40	63.40	Mediacom Communications	speedtest.mediacomtoday.com	Bad storms last night
Saturday, May 25, 2019	10:08 AM	Wired	7	2	581.50	63.20	Mediacom Communications	speedtest.mediacomtoday.com	No storms last night but bad reading
Saturday, May 25, 2019	9:06 PM	Wired	7	1	584.50	63.30	Mediacom Communications	speedtest.mediacomtoday.com	.3 inches of rain
Sunday, May 26, 2019	7:06 PM	Wired	7	1	915.90	62.90	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, May 28, 2019	10:46 AM	Wired	7	1	558.40	62.80	Mediacom Communications	speedtest.mediacomtoday.com	.50 inches of rain
Wednesday, May 29, 2019	8:41 AM	Wired	7	3	944.20	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, May 30, 2019	3:33 PM	Wired	9	3	603.60	52.40	Mediacom Communications	speedtest.mediacomtoday.com	light rain last night
Thursday, May 30, 2019	3:47 PM	Wired	5	1	948.60	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, May 31, 2019	12:00 AM	Wired	7	1	657.90	63.30	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, May 31, 2019	2:25 PM	Wired	7	1	936.60	63.50	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, June 01, 2019	1:01 PM	Wired	9	2	368.60	63.30	Mediacom Communications	speedtest.mediacomtoday.com	Rain last night
Saturday, June 01, 2019	2:36 PM	Wired	8	1	919.30	64.40	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, June 03, 2019	11:34 AM	Wired	7	2	951.10	53.30	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, June 04, 2019	9:53 AM	Wired	7	1	532.20	63.80	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, June 04, 2019	12:13 PM	Wired	9	0	947.80	59.60	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, June 12, 2019	9:49 AM	Wired	8	1	942.00	64.20	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, June 15, 2019	6:39 PM	Wired	8	1	942.10	63.60	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, June 29, 2019	9:25 AM	Wired	7	2	721.90	64.00	Mediacom Communications	speedtest.mediacomtoday.com	
		Wired					Mediacom Communications	speedtest.mediacomtoday.com	
Friday, July 31, 2020	11:00 AM	Wired	35		111.48	0.25	Mediacom Communications	speedtest.net	
Friday, July 31, 2020	11:43 AM	Wired	17	3	224.00	61.80	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, July 31, 2020	2:14 PM	Wired	17	2	368.40	62.90	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, July 31, 2020	7:09 PM	Wired	17	2	221.10	61.10	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, July 31, 2020	9:05 PM	Wired	17	10	129.10	12.30	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 01, 2020	7:02 AM	Wired	17	1	260.80	58.50	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 01, 2020	11:14 AM	Wired	18	6	354.10	29.80	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 01, 2020	11:59 AM	Wired	12	3	486.30	56.00	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 01, 2020	8:26 PM	Wired	17	5	103.20	60.20	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 02, 2020	8:11 AM	Wired	17	3	212.10	47.30	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 02, 2020	10:53 AM	Wired	14	2	316.40	54.0	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 02, 2020	11:39 AM	Wired	21	10	182.20	58.20	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 02, 2020	4:39 PM	Wired	17	9	322.20	49.60	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 02, 2020	8:39 PM	Wired	18	3	195.10	64.70	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 03, 2020	7:11 AM	Wired	18	0	281.60	51.10	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 03, 2020	11:12 AM	Wired	16	2	395.40	43.80	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 03, 2020	5:09 PM	Wired	17	2	320.20	43.80	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 03, 2020	7:06 PM	Wired	14	2	392.10	35.00	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, August 04, 2020	9:39 AM	Wired	8	1	599.40	51.00	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, August 04, 2020	10:56 AM	Wired	8	2	785.60	51.10	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, August 04, 2020	1:32 PM	Wired	8	2	839.00	35.60	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, August 04, 2020	4:33 PM	Wired	7	1	807.80	30.00	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, August 04, 2020	8:32 PM	Wired	8	5	737.00	40.30	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, August 05, 2020	9:40 AM	Wired	8	1067	497.50	16.40	Mediacom Communications	speedtest.mediacomtoday.com	Mediacom Commu.mediacomtoday.com
Wednesday, August 05, 2020	11:00 AM	Wired	8	5	893.70	48.40	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, August 05, 2020	8:10 PM	Wired	8	1	763.10	60.80	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, August 06, 2020	9:10 AM	Wired	4	2	739.40	60.80	Mediacom Communications	speedtest.mediacomtoday.com	

Date	Time	Connection	Ping	Jitter	Download*	Upload*	Server	Program	* = Mbps
Thursday, August 06, 2020	9:29 AM	Wired	8	2	365.40	55.30	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, August 06, 2020	10:02 AM	Wired	8	1	698.80	58.20	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, August 07, 2020	9:17 AM	Wired	7	0	776.20	52.00	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, August 07, 2020	9:06 PM	Wired	8	2	741.20	36.70	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 08, 2020	8:39 AM	Wired	8	1	642.90	44.20	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 08, 2020	5:26 PM	Wired	8	2	631.80	61.70	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 09, 2020	10:34 AM	Wired	8	1	326.80	60.30	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 09, 2020	12:12 PM	Wired	8	5	547.50	51.50	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 16, 2020	8:57 AM	Wired	19	2	241.40	63.90	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 16, 2020	10:06 AM	Wired	20	1	294.70	62.30	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 16, 2020	2:46 PM	Wired	19	3	228.80	62.60	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 17, 2020	9:05 AM	Wired	19	3	219.40	47.80	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, August 19, 2020	11:33 AM	Wired	3	2	392.20	60.90	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, August 20, 2020	10:29 AM	Wired	8	5	302.40	50.70	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, August 20, 2020	12:06 PM	Wired	9	1	512.20	61.70	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, August 20, 2020	7:07 PM	Wired	9	5	383.90	43.00	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, August 21, 2020	9:20 AM	Wired	8	1	576.50	60.50	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 22, 2020	8:20 AM	Wired	8	2	625.80	60.60	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 22, 2020	9:49 PM	Wired	9	3	542.80	36.60	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 23, 2020	10:05 AM	Wired	5	2	400.40	56.70	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 23, 2020	6:47 PM	Wired	7	1	296.00	60.80	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 24, 2020	10:16 AM	Wired	5	1	567.30	60.60	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 24, 2020	5:22 PM	Wired	19	1	501.70	60.10	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, August 25, 2020	10:35 AM	Wired	20	0	249.00	60.20	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, August 25, 2020	1:13 PM	Wired	19	1	299.10	60.20	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, August 26, 2020	9:20 AM	Wired	19	2	207.80	46.80	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, August 26, 2020	1:29 PM	Wired	19	3	192.50	60.20	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, August 27, 2020	10:07 AM	Wired	18	1	467.40	60.30	Mediacom Communications	speedtest.mediacomtoday.com	
Friday, August 28, 2020	8:37 AM	Wired	19	1	465.40	60.20	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 29, 2020	7:43 AM	Wired	20	3	257.20	60.20	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, August 29, 2020	11:04 AM	Wired	19	9	318.30	55.90	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, August 30, 2020	9:56 AM	Wired	18	1	397.80	61.90	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 31, 2020	5:17 AM	Wired	19	6	201.70	47.80	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 31, 2020	7:56 AM	Wired	19	2	424.40	60.10	Mediacom Communications	speedtest.mediacomtoday.com	
Monday, August 31, 2020	1:44 PM	Wired	19	4	227.70	61.70	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, September 01, 2020	10:12 AM	Wired	20	49	239.80	63.40	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, September 01, 2020	10:38 AM	Wired	19	1	253.20	60.30	Mediacom Communications	speedtest.mediacomtoday.com	
Tuesday, September 01, 2020	3:46 PM	Wired	20	3	275.90	56.40	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, September 02, 2020	8:11 AM	Wired	20	4	317.30	37.00	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, September 02, 2020	10:19 AM	Wired	19	1	284.40	60.50	Mediacom Communications	speedtest.mediacomtoday.com	
Wednesday, September 02, 2020	11:06 AM	Wired	20	7	364.70	29.90	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, September 03, 2020	8:26 AM	Wired	19	2	405.60	62.00	Mediacom Communications	speedtest.mediacomtoday.com	
Thursday, September 03, 2020	10:52 AM	Wired	19	2	266.30	56.50	Mediacom Communications	speedtest.mediacomtoday.com	
Sunday, September 06, 2020	11:10 AM	Wired	19	2	373.20	52.40	Mediacom Communications	speedtest.mediacomtoday.com	
Saturday, July 03, 2021	9:33 AM	Wired	8	1	722.90	61.00	Mediacom Communications	speedtest.mediacomtoday.com	
		Wired					Mediacom Communications	speedtest.mediacomtoday.com	
		Wired					Mediacom Communications	speedtest.mediacomtoday.com	



Account Information

This statement reflects current charges as of the date the statement was printed.

Did you know?

Mediacom requires a minimum of 7 days advanced notification to terminate service and arrange for the return of all equipment. Failure to return our equipment will result in the following charges: Non-addressable converter up to \$125.00; addressable converter up to \$300.00; modem up to \$139.99; digital converter up to \$500.00; remote control up to \$85.00.

Statement of Service

Page 1 of 2

RAYMOND KNAPP

June 19, 2021

Account Number

8383970400168591

Account PIN

3817

Telephone Number

(515) 249-1899

For Service at

422 2ND ST

PERRY IA 50220-1903

How to reach us...

Online: support.mediacomcable.com to sign into your account.

App: Download **MediacomConnect** at iTunes Store or Google Play

Phone: Call us 24/7 at 1-855-633-4226 to pay using our automated system.

Local Office Address: 225 S Dayton Ave., Ames, IA 50010



Your Summary

Bill from 06/29/21 through 07/28/21

See the back for details

Previous Balance	\$135.43
Payments	-135.43
Bundled Services	131.99
Individual Services	0.00
Taxes and Fees	3.44
Amount Due	\$135.43
Amount Due By	Autopay

CREDIT CARD CHARGE WILL BE ON 07/09/21

Closed captioning: If you are experiencing issues with Closed Captioning, please contact Mediacom Customer Service at (855) 633-4226, fax (845) 698-4079 or visit our website at <http://mediacomtoday.com>. For written closed captioning complaints, contact: Penny Kurdyla, Mediacom Closed Captioning Office, 1 Mediacom Way, Mediacom Park, NY 10918, Phone (877) 647-6221, fax (845) 698-4079 or email closedcaption@mediacomcc.com.



2205 INGERSOLL DES MOINES IA 50312-5289

8383 9700 NO RP 19 06202021 YYYNYNN 01 000176 0001

RAYMOND KNAPP
422 2ND ST
PERRY IA 50220-1903

June 19, 2021

Account Number:

8383970400168591

RAYMOND KNAPP

422 2ND ST

PERRY IA 50220-1903

Amount Due By Autopay **\$135.43**

Amount you are enclosing: \$



MEDIACOM
PO BOX 5744
CAROL STREAM IL 60197-5744



838397040016859100135434



8383 9700 NO RP 19 06202021 YYYNYNN 01 000176 0001

RAYMOND KNAPP
Account Number
Telephone Number

Page 2 of 2
June 19, 2021
8383970400168591
(515) 249-1899

Your Account Details

06/19	Previous Balance	\$135.43
06/08	Credit Card Payment	-135.43
		\$0.00

Your Bundled Services

06/29 - 07/28	Comp Mkt Offer Yr 3 (01/19) - 4350 Year 3	131.99
	1 Gig Internet-6000 GB	109.99
	Modem/EMTA	0.00
	High Speed Modem	12.00
	* Mediacom Phone Service	10.00

Three year promotion. Year 3 bundle discount expires on 01/21/22. (PC)
Year 3 bundle discount amount: \$69.95

\$131.99

Taxes and Fees

Internet

06/19	Local Sales Tax	0.12
06/19	State Sales Tax	0.72

Phone

06/19	Regulatory Recovery Fee	0.18
06/19	Local Sales Tax	0.07
06/19	Local E911 Tax	1.00
06/19	Iowa Dual Party Relay	0.03
06/19	Federal Universal Service Fund	0.88
06/19	State Sales Tax	0.44
		\$3.44

Total Due By Autopay \$135.43

FOR COMPLAINTS REGARDING YOUR TELEPHONE SERVICE, YOU MAY REQUEST ASSISTANCE FROM THE IOWA UTILITIES BOARD BY WRITING 1375 E COURT AVENUE, ROOM 69, DES MOINES, IOWA 50319-0069, BY CALLING 515-725-7321 OR TOLL FREE 1-877-565-4450 OR EMAIL CUSTOMER@IUB.IOWA.GOV FCC COMMUNITY ID: IA0069

MediacomConnect MobileCARE App

Just a touch, tap and a swipe away – the MediacomConnect app is the **FREE** and **EASY** way to manage your account from wherever you are.

- | | |
|---|---|
| <input checked="" type="checkbox"/> View billing statements | <input checked="" type="checkbox"/> Check account balance |
| <input checked="" type="checkbox"/> Review account history | <input checked="" type="checkbox"/> Monitor Internet data usage |
| <input checked="" type="checkbox"/> Pay monthly bill | <input checked="" type="checkbox"/> Schedule service appointments |
| <input checked="" type="checkbox"/> Manage Auto Pay | <input checked="" type="checkbox"/> Manage WiFi service |

Go to GooglePlay® or the iTunes® app store and download today.



Payment Options

ONLINE:

Visit support.mediacomcable.com to sign into your account.

THE APP:

Download the **MediacomConnect MOBILECare app**. Go to Google Play or iTunes app store and download today.

TEXT:

Text Mediacom to 66554

PHONE:

Call us 24/7 at 1-855-633-4226 to pay using our automated phone system.

MAIL:

Return this payment stub with your check or money order made **payable to Mediacom**.

Minburn Telephone Company

Challenge – Perry Rural

Other Supporting Documentation

Perry Rural Broadband Expansion

Empower Rural Iowa Broadband Grants
Program

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*****AUTO**ALL FOR AADC 500

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T9 P1

We make your internet experience fun again!

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- Online Gaming

High-Speed!



- Low Latency
- Download Speed Up to 30 Mbps

Support!



- Fast & Friendly Tech Support
- Personalized Customer Care

- Consistently Reliable Internet
- No Contracts or Data Limits
- Professional Installation
- Family Owned and Operated
- Router Service Plans Available



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

BTWI Wireless Internet
Jeff Leerhoff
jeff@btwi.net

To whom it may concern:

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

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

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

²See Iowa Admin. Code r. 129—20.3.

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Office of the Chief Information Officer,
State of Iowa



EXHIBIT A

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

A. RESPONDENT INFORMATION

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

B. DESIGNATED CONTACT INFORMATION

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

C. AFFIRMATION

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

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

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

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

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

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

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

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

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

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

Facilitate

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

CENSUS BLOCK ID	Do you Facilitate service to more than 10% of the geographic area of the Census Block?	Download Speed	Upload Speed
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APPEALANT	NOTES:
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190130026031091	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026031092	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026031093	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026031094	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190130026031095	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190130026031096	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190130026031097	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026031098	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026031099	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026031100	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026031101	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026031102	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026034016	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190130026034037	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190130026034047	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190130030021028	No	----	----	CFU	Decommissioned tower and equipment caused change in status

190130030021033	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190130030021034	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190230705002058	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190230705002059	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190230705002066	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190230705002067	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190230705002068	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190230705002071	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190230705003000	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190230705003010	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190230705003011	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190230705003012	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190230705003059	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002001	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002002	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002007	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002008	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002009	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002010	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002012	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002013	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002018	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002020	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002021	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002022	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002023	Yes	50	16	CFU	Decommissioned tower and equipment caused change in status
190759601002027	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002028	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002029	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002038	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002041	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002044	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002045	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002047	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190759601002057	No	----	----	CFU	Decommissioned tower and equipment caused change in status
190490505002023	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service
190490505002079	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service
190490505002080	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service
190490505002081	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service

190490505002085	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002088	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002089	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002090	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002091	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002093	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002094	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002124	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002129	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190490505002130	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001094	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M, Windstream has 100M, & Minburn has 1G service		
190779501001095	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001096	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001104	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M, Windstream has 100M, & Minburn has 1G service		
190779501001105	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001106	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001108	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001109	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001110	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001112	Yes	100Mbps	50Mbps	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001116	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001117	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001142	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190779501001143	No	----	----	Panora	Per OCIO Map v4, Panora has 50M & Windstream has 100M service		
190693601002009	Yes	100Mbps	50Mbps	Dumont			
190693601002010	Yes	100Mbps	50Mbps	Dumont			
190693601002025	Yes	100Mbps	50Mbps	Dumont			
190693601002031	Yes	100Mbps	50Mbps	Dumont			
190693601002034	Yes	100Mbps	50Mbps	Dumont			
190693601002036	Yes	100Mbps	50Mbps	Dumont			
190693601002038	Yes	100Mbps	50Mbps	Dumont			
190693601002039	Yes	100Mbps	50Mbps	Dumont			
190693601002053	Yes	100Mbps	50Mbps	Dumont			
190693601002054	Yes	100Mbps	50Mbps	Dumont			
190693601002068	Yes	100Mbps	50Mbps	Dumont			
190693601002071	Yes	100Mbps	50Mbps	Dumont			
190693601002072	Yes	100Mbps	50Mbps	Dumont			
190693601002073	Yes	100Mbps	50Mbps	Dumont			
190693601002074	Yes	100Mbps	50Mbps	Dumont			

190693601002076	Yes	100Mbps	50Mbps	Dumont			
190693601002079	Yes	100Mbps	50Mbps	Dumont			
190693601002080	Yes	100Mbps	50Mbps	Dumont			
190693601002082	Yes	100Mbps	50Mbps	Dumont			
190693601002084	Yes	100Mbps	50Mbps	Dumont			
190693601002088	Yes	100Mbps	50Mbps	Dumont			
190693601002096	Yes	100Mbps	50Mbps	Dumont			
190693601002097	Yes	100Mbps	50Mbps	Dumont			
190693601002098	Yes	100Mbps	50Mbps	Dumont			
190693601002099	Yes	100Mbps	50Mbps	Dumont			
190693601002110	Yes	100Mbps	50Mbps	Dumont			
190693601002112	Yes	100Mbps	50Mbps	Dumont			
190693601002116	Yes	100Mbps	50Mbps	Dumont			
190693601002118	Yes	100Mbps	50Mbps	Dumont			
190693601002119	Yes	100Mbps	50Mbps	Dumont			
190693601002122	Yes	100Mbps	50Mbps	Dumont			
190693601002124	Yes	100Mbps	50Mbps	Dumont			
190693601002127	Yes	100Mbps	50Mbps	Dumont			
190693601002128	Yes	100Mbps	50Mbps	Dumont			
190693601002131	Yes	100Mbps	50Mbps	Dumont			
190693601002138	Yes	100Mbps	50Mbps	Dumont			
190693601002139	Yes	100Mbps	50Mbps	Dumont			
190693601002140	Yes	100Mbps	50Mbps	Dumont			
190693601002142	Yes	100Mbps	50Mbps	Dumont			
190693601002144	Yes	100Mbps	50Mbps	Dumont			
190693601002151	Yes	100Mbps	50Mbps	Dumont			
190693601002153	Yes	100Mbps	50Mbps	Dumont			
190693601002159	Yes	100Mbps	50Mbps	Dumont			
190693601003017	Yes	100Mbps	50Mbps	Dumont			
190693601003018	Yes	100Mbps	50Mbps	Dumont			
190693601003019	Yes	100Mbps	50Mbps	Dumont			
190693601003020	Yes	100Mbps	50Mbps	Dumont			
190693601003024	Yes	100Mbps	50Mbps	Dumont			
190693601003026	Yes	100Mbps	50Mbps	Dumont			
190693601003028	Yes	100Mbps	50Mbps	Dumont			
190693601003030	Yes	100Mbps	50Mbps	Dumont			
190693601003033	Yes	100Mbps	50Mbps	Dumont			
190693601003292	Yes	100Mbps	50Mbps	Dumont			
190693601003293	Yes	100Mbps	50Mbps	Dumont			

190693602001086	Yes	100Mbps	50Mbps	Dumont			
190693602001092	Yes	100Mbps	50Mbps	Dumont			
					BTWI subscribers per reported census H/S/B	Range of DL speeds subscribed through BTWI	
190150206001212	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190150206001215	Yes	100Mbps	50Mbps	Minburn	4 of 9	20M-50M	
190150206001218	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190150206001233	Yes	100Mbps	50Mbps	Minburn	1 of 1	10M	
190150206001239	Yes	100Mbps	50Mbps	Minburn	1 of 1	30M	
190150206001240	Yes	100Mbps	50Mbps	Minburn	3 of 5	30M-50M	
190150206001241	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190150206001242	Yes	100Mbps	50Mbps	Minburn	4 of 5	20M-50M	
190150206001245	Yes	100Mbps	50Mbps	Minburn	1 of 9	20M	
190150206001247	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190150206001249	Yes	100Mbps	50Mbps	Minburn	0 of 6	-	
190150206001250	Yes	100Mbps	50Mbps	Minburn	2 of 8	10M-20M	
190150206001251	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190150206001252	Yes	100Mbps	50Mbps	Minburn	1 of 2	10M	
190150206001253	Yes	100Mbps	50Mbps	Minburn	3 of 6	10M-30M	
190150206001255	Yes	100Mbps	50Mbps	Minburn	3 of 4	20M-50M	
190150206001256	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190150206001257	Yes	100Mbps	50Mbps	Minburn	1 of 3	100M	
190150206001258	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190150206001259	Yes	100Mbps	50Mbps	Minburn	1 of 2	20M	
190150206001278	Yes	100Mbps	50Mbps	Minburn	2 of 3	50M	
190150206001279	Yes	100Mbps	50Mbps	Minburn	2 of 3	50M	
190150206001280	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190150206001281	Yes	100Mbps	50Mbps	Minburn	1 of 1	50M	
190150206001282	Yes	100Mbps	50Mbps	Minburn	1 of 2	15M	
190150206001283	Yes	100Mbps	50Mbps	Minburn	3 of 10	4M-20M	
190150206001284	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190150206001285	Yes	100Mbps	50Mbps	Minburn	7 of 14	10M-50M	
190150206001286	Yes	100Mbps	50Mbps	Minburn	35 of 41	4M-200M	
190150206001287	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190150206001288	Yes	100Mbps	50Mbps	Minburn	2 of 6	15M-50M	
190150206001289	Yes	100Mbps	50Mbps	Minburn	3 of 3	15M-50M	
190150206001290	Yes	100Mbps	50Mbps	Minburn	5 of 9	10M-50M	
190150206001291	Yes	100Mbps	50Mbps	Minburn	1 of 1	30M	

190150206001292	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190150206001293	Yes	100Mbps	50Mbps	Minburn	1 of 2	10M	
190150206001294	Yes	100Mbps	50Mbps	Minburn	3 of 3	10M-50M	
190150206001295	Yes	100Mbps	50Mbps	Minburn	3 of 5	10M-15M	
190150206001296	Yes	100Mbps	50Mbps	Minburn	3 of 3	30M-50M	
190150206001332	Yes	100Mbps	50Mbps	Minburn	2 of 3	10M-50M	
190490502002009	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490502002010	Yes	100Mbps	50Mbps	Minburn	4 of 6	15M-30M	
190490502002011	Yes	100Mbps	50Mbps	Minburn	2 of 3	15M-20M	
190490502002012	Yes	100Mbps	50Mbps	Minburn	1 of 2	20M	
190490502002013	Yes	100Mbps	50Mbps	Minburn	5 of 18	20M-50M	
190490502002014	Yes	100Mbps	50Mbps	Minburn	1 of 1	20M	
190490502002015	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502002016	Yes	100Mbps	50Mbps	Minburn	1 of 4	50M	
190490502002039	Yes	100Mbps	50Mbps	Minburn	4 of 8	20M-50M	
190490502002040	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490502002041	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490502002042	Yes	100Mbps	50Mbps	Minburn	1 of 1	50M	
190490502002043	Yes	100Mbps	50Mbps	Minburn	10 of 11	10M-50M	
190490502002044	Yes	100Mbps	50Mbps	Minburn	0 of 6	-	
190490502002046	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490502002047	Yes	100Mbps	50Mbps	Minburn	2 of 3	50M	
190490502002048	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490502002049	Yes	100Mbps	50Mbps	Minburn	2 of 10	15M-20M	
190490502002050	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490502002081	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490502002082	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502002090	Yes	100Mbps	50Mbps	Minburn	1 of 3	50M	
190490503001035	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490503003001	Yes	100Mbps	50Mbps	Minburn	0 if 1	-	
190490503003007	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490504001025	Yes	100Mbps	50Mbps	Minburn	1 of 2	50M	
190490504001029	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490504001060	Yes	100Mbps	50Mbps	Minburn	1 of 1	10M	(Note: census data is incorrect)
190490504001061	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490504003004	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490504003005	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001000	Yes	100Mbps	50Mbps	Minburn	4 of 7	10M-50M	
190490505001001	Yes	100Mbps	50Mbps	Minburn	2 of 10	30M	

190490505001002	Yes	100Mbps	50Mbps	Minburn	4 of 8	10M-50M	
190490505001003	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001004	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505001006	Yes	100Mbps	50Mbps	Minburn	5 of 11	10M-50M	
190490505001009	Yes	100Mbps	50Mbps	Minburn	1 of 1	15M	
190490505001020	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505001021	Yes	100Mbps	50Mbps	Minburn	1 of 3	20M	
190490505001024	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505001027	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505001028	Yes	100Mbps	50Mbps	Minburn	2 of 5	20M-100M	
190490505001029	Yes	100Mbps	50Mbps	Minburn	1 of 1	4M	
190490505001030	Yes	100Mbps	50Mbps	Minburn	3 of 5	10M-50M	
190490505001031	Yes	100Mbps	50Mbps	Minburn	10 of 20	10M-50M	
190490505001032	Yes	100Mbps	50Mbps	Minburn	1 of 2	10M	
190490505001033	Yes	100Mbps	50Mbps	Minburn	4 of 9	15M-30M	
190490505001034	Yes	100Mbps	50Mbps	Minburn	1 of 6	20M	
190490505001045	Yes	100Mbps	50Mbps	Minburn	1 of 3	4M	
190490505001046	Yes	100Mbps	50Mbps	Minburn	3 of 3	20M-50M	
190490505001047	Yes	100Mbps	50Mbps	Minburn	2 of 4	50M	
190490505001048	Yes	100Mbps	50Mbps	Minburn	1 of 2	50M	
190490505001049	Yes	100Mbps	50Mbps	Minburn	1 of 1	10M	
190490505001050	Yes	100Mbps	50Mbps	Minburn	2 of 2	50M	
190490505001051	Yes	100Mbps	50Mbps	Minburn	4 of 7	30M-50M	
190490505001052	Yes	100Mbps	50Mbps	Minburn	5 of 6	15M-50M	
190490505001053	Yes	100Mbps	50Mbps	Minburn	4 of 10	10M-20M	
190490505001054	Yes	100Mbps	50Mbps	Minburn	2 of 7	50M	
190490505001055	Yes	100Mbps	50Mbps	Minburn	1 of 2	15M	
190490505001057	Yes	100Mbps	50Mbps	Minburn	0 of 9	-	
190490505001058	Yes	100Mbps	50Mbps	Minburn	0 of 6	-	
190490505001059	Yes	100Mbps	50Mbps	Minburn	1 of 16	15M	
190490505001060	Yes	100Mbps	50Mbps	Minburn	1 of 11	50M	
190490505001062	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505001065	Yes	100Mbps	50Mbps	Minburn	1 of 18	50M	
190490505001069	Yes	100Mbps	50Mbps	Minburn	6 of 11	20M-50M	
190490505001071	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505001073	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505001074	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490505001075	Yes	100Mbps	50Mbps	Minburn	1 of 2	15M	
190490505001076	Yes	100Mbps	50Mbps	Minburn	3 of 3	10M-50M	

190490505001077	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505001078	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505001079	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001080	Yes	100Mbps	50Mbps	Minburn	1 of 7	20M	
190490505001081	Yes	100Mbps	50Mbps	Minburn	2 of 3	10M-15M	(Note: census data is incorrect)
190490505001082	Yes	100Mbps	50Mbps	Minburn	1 of 2	10M	(Note: census data is incorrect)
190490505001083	Yes	100Mbps	50Mbps	Minburn	1 of 3	50M	
190490505001089	Yes	100Mbps	50Mbps	Minburn	2 of 4	10M	
190490505001098	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001099	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001104	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001105	Yes	100Mbps	50Mbps	Minburn	1 of 3	20M	
190490505001110	Yes	100Mbps	50Mbps	Minburn	3 of 5	4M-100M	
190490505001111	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505001112	Yes	100Mbps	50Mbps	Minburn	1 of 3	4M	
190490505001113	Yes	100Mbps	50Mbps	Minburn	2 of 3	10M-20M	
190490505001114	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505001115	Yes	100Mbps	50Mbps	Minburn	1 of 4	10M	
190490505001116	Yes	100Mbps	50Mbps	Minburn	0 of 4	-	
190490505001118	Yes	100Mbps	50Mbps	Minburn	0 of 4	-	
190490505001119	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001120	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490505001121	Yes	100Mbps	50Mbps	Minburn	3 of 6	30M-50M	
190490505001122	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490505001127	Yes	100Mbps	50Mbps	Minburn	2 of 5	30M-50M	
190490505001128	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001129	Yes	100Mbps	50Mbps	Minburn	1 of 1	20M	
190490505001130	Yes	100Mbps	50Mbps	Minburn	3 of 3	10M-30M	
190490505001134	Yes	100Mbps	50Mbps	Minburn	1 of 2	10M	
190490505001135	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490505001145	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001146	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505001147	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505001148	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001149	Yes	100Mbps	50Mbps	Minburn	1 of 2	4M	
190490505001150	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505001168	Yes	100Mbps	50Mbps	Minburn	1 of 2	15M	
190490505001169	Yes	100Mbps	50Mbps	Minburn	2 of 4	30M	
190490505001208	Yes	100Mbps	50Mbps	Minburn	3 of 13	15M-50M	

190730801001117	Yes	100Mbps	50Mbps	Minburn	1 of 1	50M	
190730801001119	Yes	100Mbps	50Mbps	Minburn	1 of 2	10M	
190730801001120	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190730801001153	Yes	100Mbps	50Mbps	Minburn	1 of 1	15M	
190730801001155	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190730801001159	Yes	100Mbps	50Mbps	Minburn	1 of 2	20M	
190730801001161	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190730801001167	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490501003037	Yes	100Mbps	50Mbps	Minburn	2 of 6	50M	
190490501003038	Yes	100Mbps	50Mbps	Minburn	0 of 9	-	
190490501003055	Yes	100Mbps	50Mbps	Minburn	0 of 9	-	
190490501003061	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490501003062	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490501004031	Yes	100Mbps	50Mbps	Minburn	1 of 32	20M	
190490501004032	Yes	100Mbps	50Mbps	Minburn	0 of 19	-	
190490501004034	Yes	100Mbps	50Mbps	Minburn	0 of 13	-	
190490501004035	Yes	100Mbps	50Mbps	Minburn	1 of 11	15M	
190490501004041	Yes	100Mbps	50Mbps	Minburn	6 of 16	20M-50M	
190490501004042	Yes	100Mbps	50Mbps	Minburn	1 of 3	10M	
190490501004043	Yes	100Mbps	50Mbps	Minburn	0 of 7	-	
190490502001000	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502001002	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502001003	Yes	100Mbps	50Mbps	Minburn	0 of 6	-	
190490502001004	Yes	100Mbps	50Mbps	Minburn	1 of 9	20M	
190490502001032	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490502001035	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490502001036	Yes	100Mbps	50Mbps	Minburn	0 of 6	-	
190490502001037	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490502001038	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490502001039	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502001040	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490502001041	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490502001042	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490502001043	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502001044	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490502001045	Yes	100Mbps	50Mbps	Minburn	0 of 7	-	
190490502001046	Yes	100Mbps	50Mbps	Minburn	1 of 1	10M	
190490502001047	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490502001048	Yes	100Mbps	50Mbps	Minburn	0 of 14	-	

190490502001051	Yes	100Mbps	50Mbps	Minburn	0 of 10	-	
190490502001056	Yes	100Mbps	50Mbps	Minburn	1 of 13	20M	
190490502001057	Yes	100Mbps	50Mbps	Minburn	1 of 1	20M	
190490502001064	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502001065	Yes	100Mbps	50Mbps	Minburn	0 of 4	-	
190490502001066	Yes	100Mbps	50Mbps	Minburn	0 of 7	-	
190490502002093	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490502002094	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502003000	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	
190490502003002	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490502003003	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001170	Yes	100Mbps	50Mbps	Minburn	1 of 16	50M	
190490505001171	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505001172	Yes	100Mbps	50Mbps	Minburn	0 of 4	-	
190490505001176	Yes	100Mbps	50Mbps	Minburn	1 of 4	15M	
190490505001177	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490505001178	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505001179	Yes	100Mbps	50Mbps	Minburn	2 of 4	50M	
190490505001182	Yes	100Mbps	50Mbps	Minburn	0 of 4	-	
190490505002001	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505002002	Yes	100Mbps	50Mbps	Minburn	3 of 9	10M-30M	
190490505002004	Yes	100Mbps	50Mbps	Minburn	2 of 4	20M	
190490505002005	Yes	100Mbps	50Mbps	Minburn	2 of 4	20M-50M	
190490505002006	Yes	100Mbps	50Mbps	Minburn	3 of 4	4M-50M	
190490505002007	Yes	100Mbps	50Mbps	Minburn	1 of 2	50M	
190490505002008	Yes	100Mbps	50Mbps	Minburn	5 of 9	20M-30M	
190490505002048	Yes	100Mbps	50Mbps	Minburn	2 of 2	15M	
190490505002049	Yes	100Mbps	50Mbps	Minburn	2 of 4	15M-50M	
190490505002051	Yes	100Mbps	50Mbps	Minburn	1 of 3	50M	
190490505002052	Yes	100Mbps	50Mbps	Minburn	1 of 1	4M	
190490505002053	Yes	100Mbps	50Mbps	Minburn	0 of 1	-	
190490505002057	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505002058	Yes	100Mbps	50Mbps	Minburn	2 of 4	30M	
190490505002059	Yes	100Mbps	50Mbps	Minburn	1 of 2	30M	
190490505002060	Yes	100Mbps	50Mbps	Minburn	0 of 2	-	
190490505002061	Yes	100Mbps	50Mbps	Minburn	3 of 4	15M-30M	
190490505002062	Yes	100Mbps	50Mbps	Minburn	1 of 6	50M	
190490505002063	Yes	100Mbps	50Mbps	Minburn	0 of 7	-	
190490505002064	Yes	100Mbps	50Mbps	Minburn	0 of 5	-	

190490505002065	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490505002066	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490505002070	Yes	100Mbps	50Mbps	Minburn	1 of 6	20M	
190490505002071	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505002072	Yes	100Mbps	50Mbps	Minburn	1 of 1	50M	
190490505002073	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505002074	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490505002076	Yes	100Mbps	50Mbps	Minburn	0 of 4	-	
190490505002077	Yes	100Mbps	50Mbps	Minburn	1 of 4	15M	
190490505002119	Yes	100Mbps	50Mbps	Minburn	0 of 4	-	
190490505002120	Yes	100Mbps	50Mbps	Minburn	0 of 3	-	
190490505002122	Yes	100Mbps	50Mbps	Minburn	2 of 7	50M	
190490505002128	Yes	100Mbps	50Mbps	Minburn	0 of 0	N/A	
190490507001003	Yes	100Mbps	50Mbps	Minburn	1 of 10	50M	

BTWI

Response to Appeals Regarding OCIO Broadband Availability Map v4

Regarding Cedar Falls Utilities appeal:

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

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

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

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

BTWI

Response to Appeals Regarding OCIO Broadband Availability Map v4

Regarding Panora Telephone appeal:

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

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

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

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

Special Note:

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

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

BTWI

Response to Appeals Regarding OCIO Broadband Availability Map v4

Regarding Dumont Telephone appeal:

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

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

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

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

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

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

BTWI stands by the information as reported.

BTWI

Response to Appeals Regarding OCIO Broadband Availability Map v4

Regarding Minburn Telephone appeal:

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

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

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

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

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

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

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

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

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

Perry Rural Research: Information provided by CheckPoint Solutions

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

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

(please see the 6 items listed previously)

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

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

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

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

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

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

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

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

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

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

Residential Affidavits: (please read the notes below)

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

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

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

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

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

David Wambold (affidavit regarding Minburn Comm.): Unknown

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

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

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

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

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

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

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

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

IN SUMMARY:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Respectfully Submitted,



Jeff Leerhoff, Co-Owner and General Manager

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


Jeff Leerhoff

Speaker 1 (representative from Greater Des Moines Partnership)

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

Speaker 2 (participant of meeting)

Hey (name)....

Speaker 1 (representative from Greater Des Moines Partnership)

(name), do you have a question?

Speaker 2 (participant of meeting)

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

Speaker 3 (representative from HR Green)

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

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

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

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

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

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

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

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Aug 1, 2021 - Aug 31, 2021

Due Date
Aug 1, 2021

Total amount due
\$0.00

Invoice
30606

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

Account number 1247206

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

SEE BACK OF PAGE FOR DETAILS

Total due on Aug 1, 2021 \$0.00

Customer Service

Call us at (515) 465-3043

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

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

Current Charges

Up to 50.0Mbps **\$100.00**

Payments Applied

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

Total Amount Due

\$0.00

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Aug 1, 2021 - Aug 31, 2021

Due Date
Aug 1, 2021

Total amount due
\$0.00

Invoice
30635

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

Account number 1247326

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

SEE BACK OF PAGE FOR DETAILS

Total due on Aug 1, 2021 \$0.00

Customer Service

Call us at (515) 465-3043

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

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

Current Charges

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

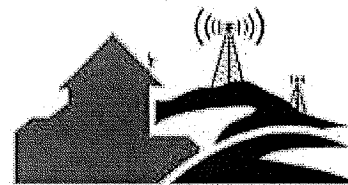
Payments Applied

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

\$0.00

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Aug 1, 2021 - Aug 31, 2021

Due Date
Aug 1, 2021

Total amount due
\$0.00

Invoice
29731

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

Account number 841439

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

SEE BACK OF PAGE FOR DETAILS

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

Customer Service

Call us at (515) 465-3043

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

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

Current Charges

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

Payments Applied

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

Total Amount Due

\$0.00

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Aug 1, 2021 - Aug 31, 2021

Due Date
Aug 1, 2021

Total amount due
\$0.00

Invoice
29968

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

Account number 1171066

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

SEE BACK OF PAGE FOR DETAILS

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

Customer Service

Call us at (515) 465-3043

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

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

Current Charges

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

Payments Applied

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

\$0.00

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Aug 1, 2021 - Aug 31, 2021

Due Date
Aug 1, 2021

Total amount due
\$0.00

Invoice
29943

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

Account number 1136817

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

SEE BACK OF PAGE FOR DETAILS

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

Customer Service

Call us at (515) 465-3043

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

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

Current Charges

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

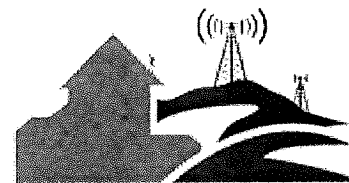
Payments Applied

Payment on Aug 3, 2021	\$105.00
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Total Amount Due

\$0.00

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Aug 1, 2021 - Aug 31, 2021

Due Date
Aug 1, 2021

Total amount due
\$0.00

Invoice
30512

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

Account number 1246884

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

SEE BACK OF PAGE FOR DETAILS

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

Customer Service

Call us at (515) 465-3043

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

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

Current Charges

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

Payments Applied

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

Total Amount Due

\$0.00

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Sep 1, 2021 - Sep 30, 2021

Due Date
Sep 1, 2021

Total amount due
\$105.00

Invoice
31862

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

Account number 1247375

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

SEE BACK OF PAGE FOR DETAILS

Total due on Sep 1, 2021 \$105.00

Customer Service

Call us at (515) 465-3043

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

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

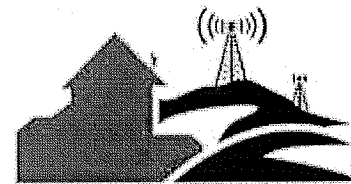
Current Charges

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

Total Amount Due

\$105.00

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Aug 1, 2021 - Aug 31, 2021

Due Date
Aug 1, 2021

Total amount due
\$0.00

Invoice
30372

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

Account number 1246392

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

SEE BACK OF PAGE FOR DETAILS

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

Customer Service

Call us at (515) 465-3043

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

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

Current Charges

Up to 50.0Mbps **\$100.00**

Payments Applied

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

Total Amount Due

\$0.00

BTWI
1020 26TH ST
PERRY, IA 50220



Service Period
Aug 1, 2021 - Aug 31, 2021

Due Date
Aug 1, 2021

Total amount due
\$0.00

Invoice
30636

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

Account number 1247328

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

SEE BACK OF PAGE FOR DETAILS

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

Customer Service

Call us at (515) 465-3043

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

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

Current Charges

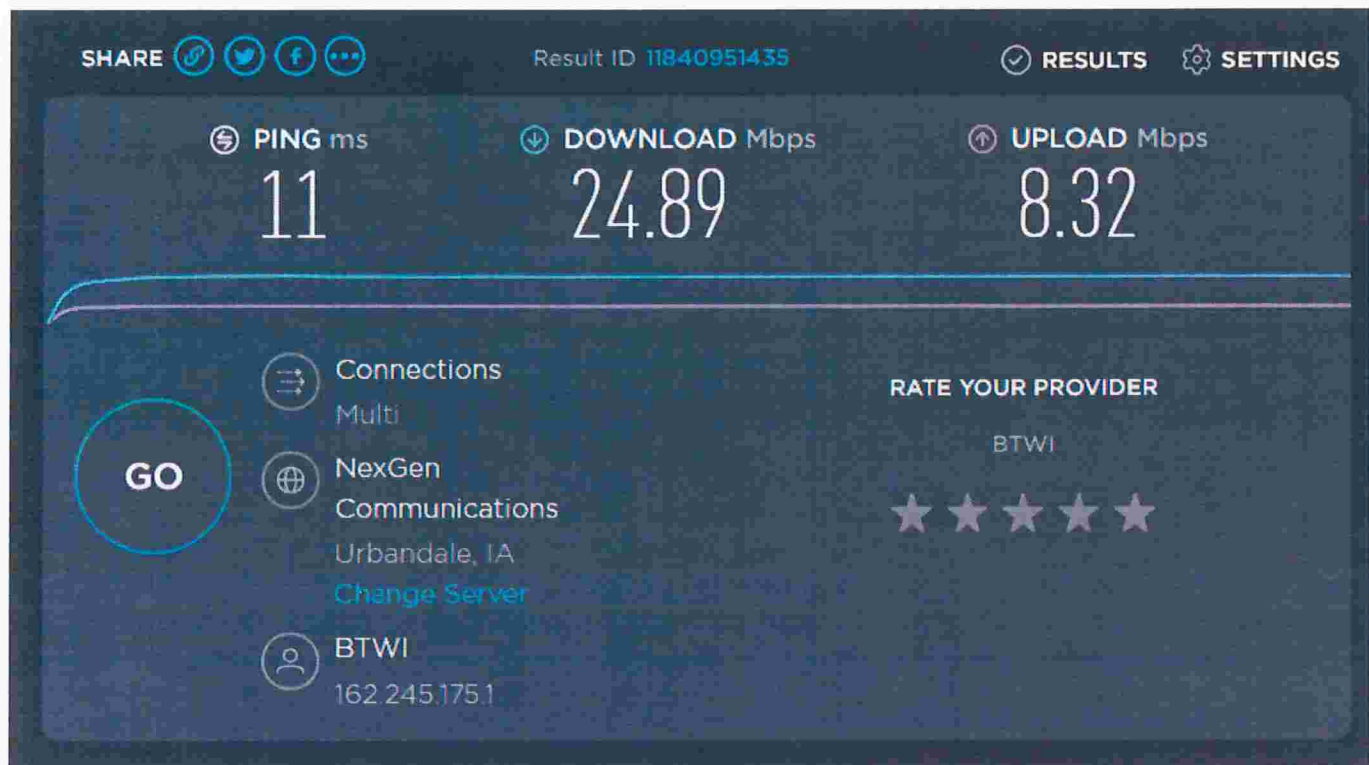
Business Pricing-100Mbps/50Mbps (Includes 1 Static IP)	\$185.00
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Payments Applied

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

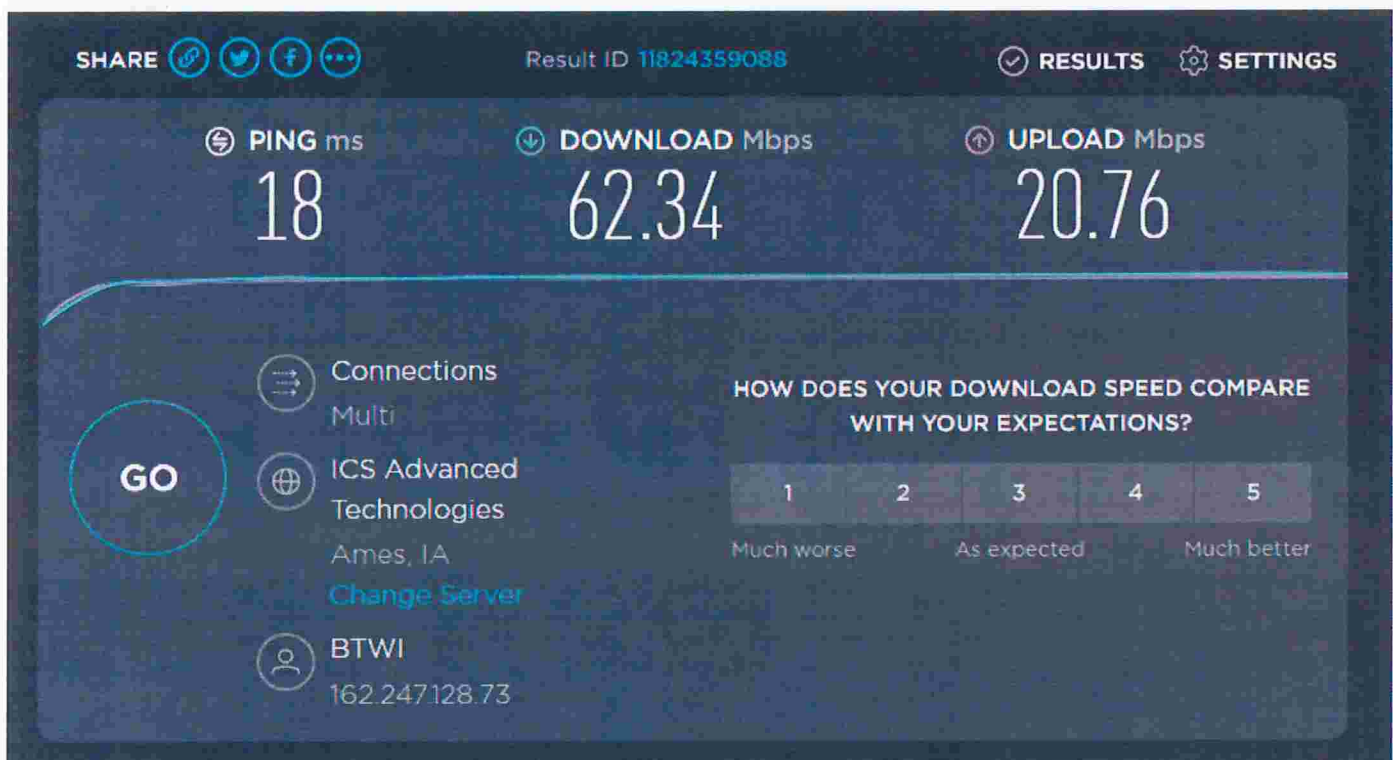
Total Amount Due

\$0.00



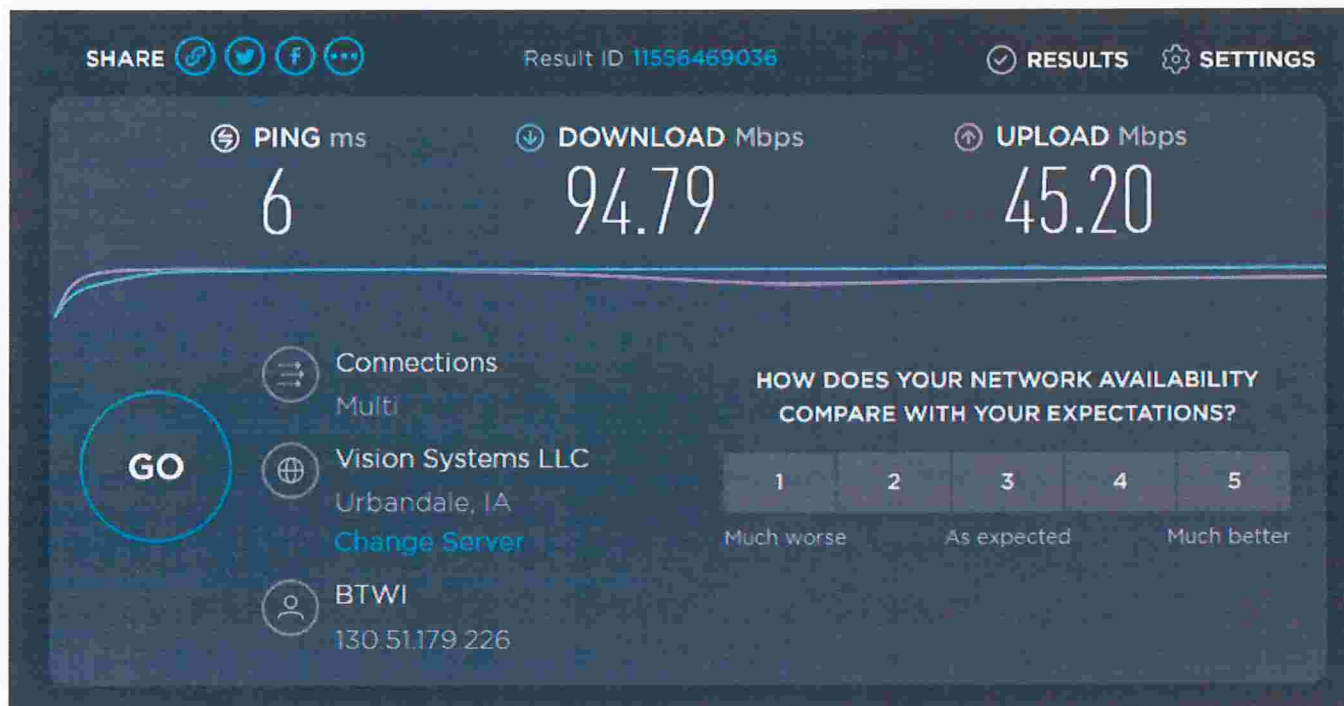
I certify that these results are from an actual speed test across BTWI's network taken from a subscriber's equipment who was subscribed to a 20Mbps plan.

Jeff Henhoff



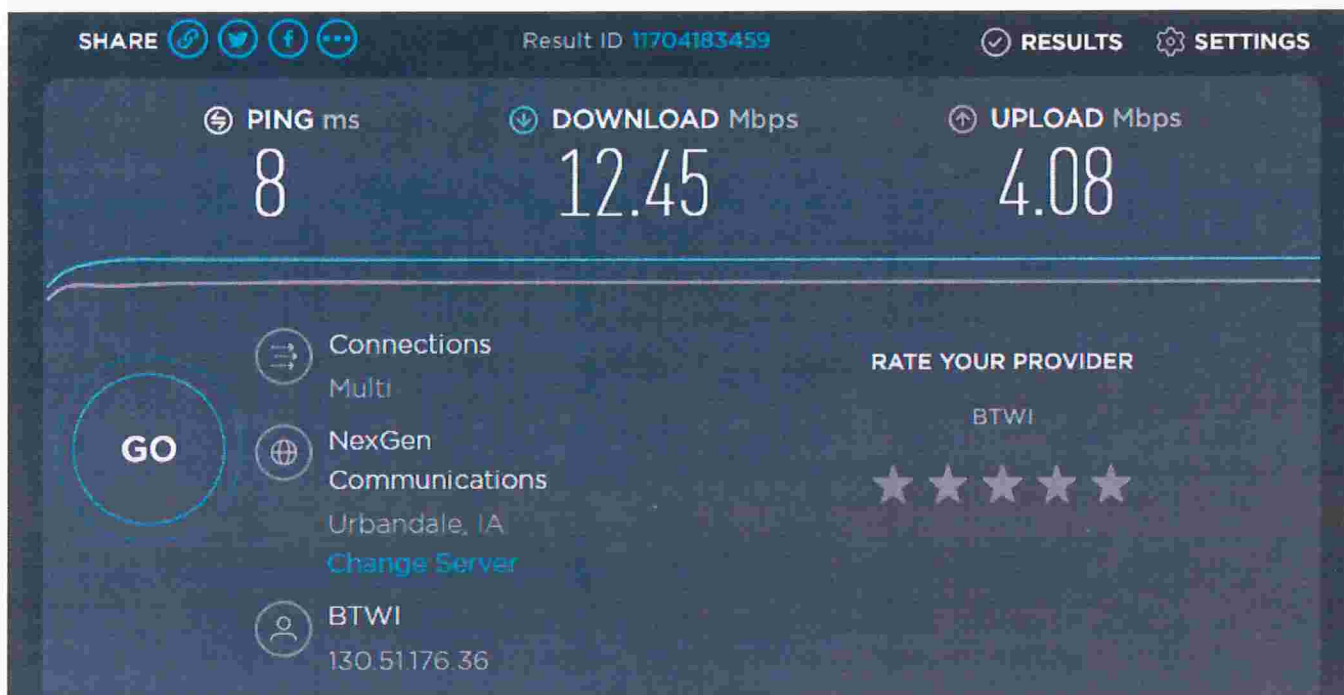
I certify that these results are from an actual speed test across BTWI's network taken from a subscriber's equipment who was subscribed to a 50Mbps plan.

Jeff Henhoff



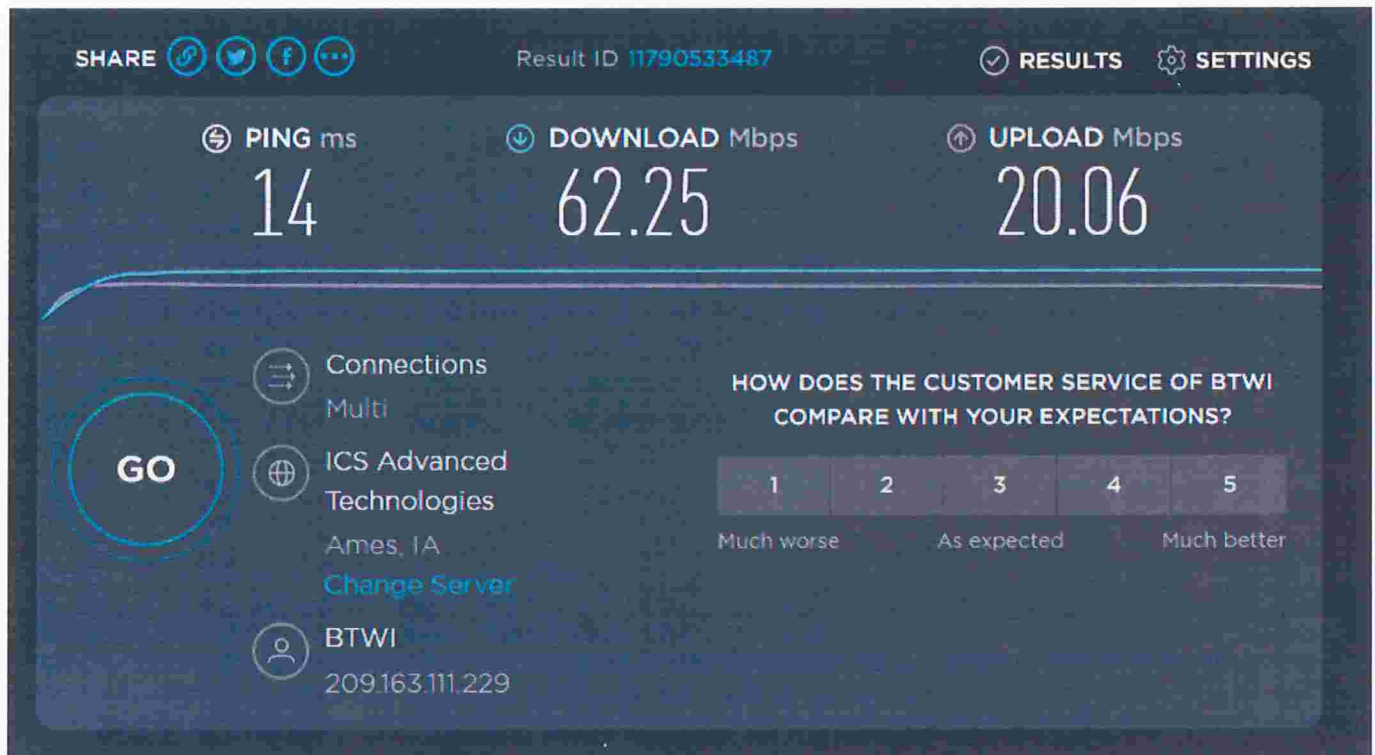
I certify that these results are from an actual speed test across BTWI's network taken from a subscriber's equipment who was subscribed to a 100Mbps plan.

Giff Seerhoff



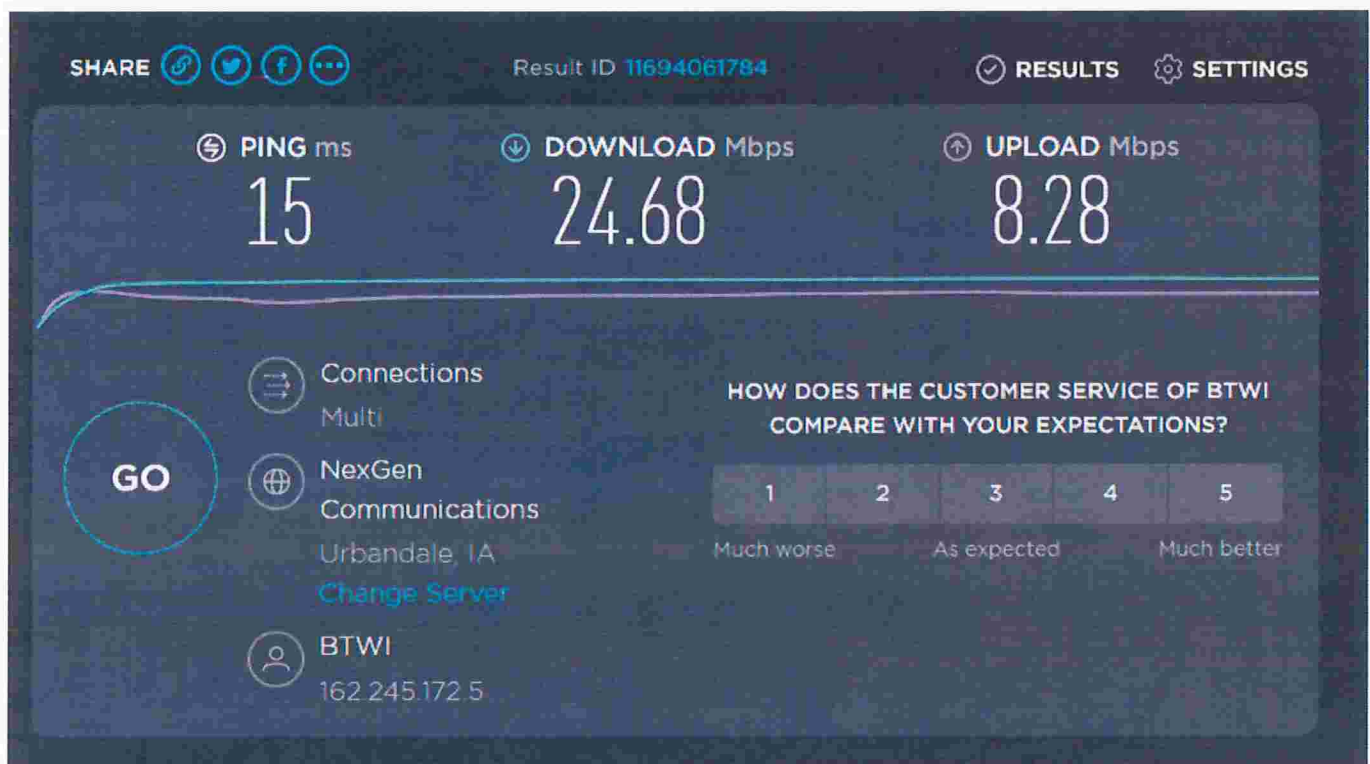
I certify that these results are from an actual speed test across BTWI's network taken from a subscriber's equipment who was subscribed to a 10Mbps plan.

Giff Seerhoff



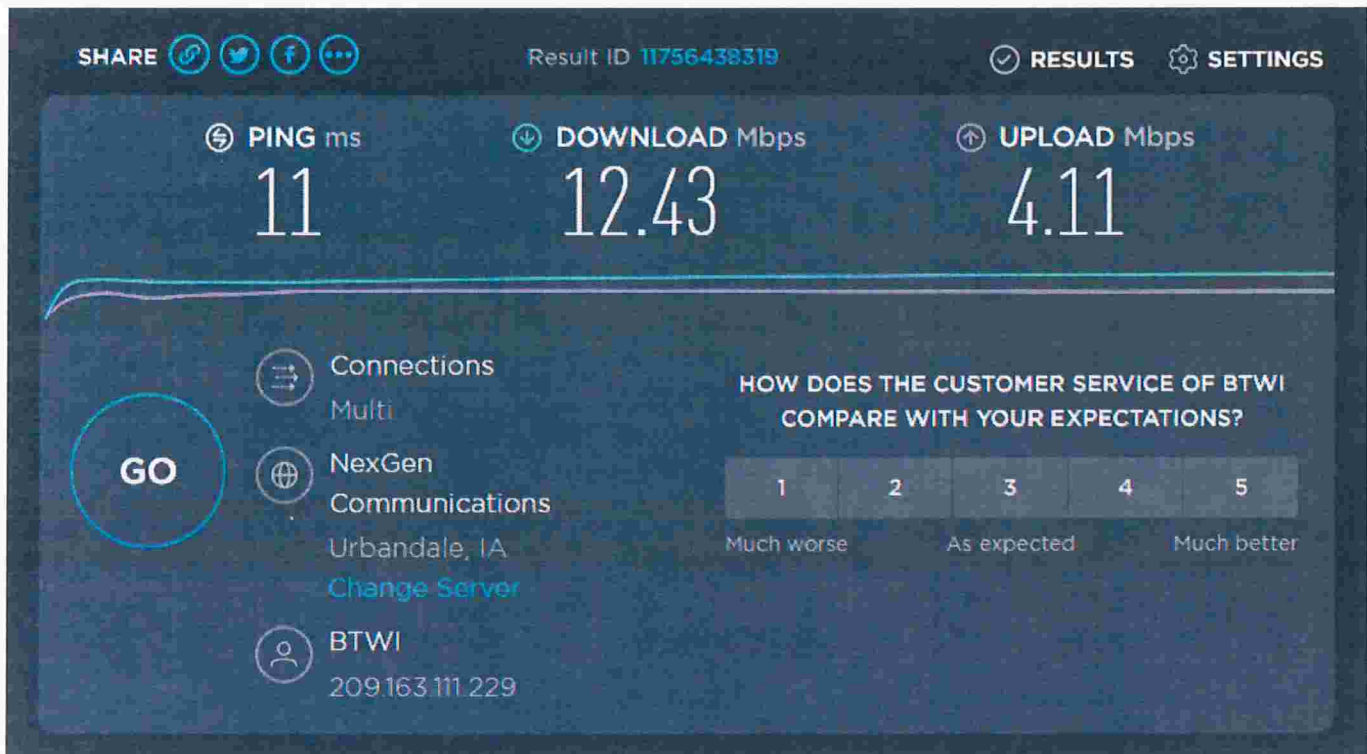
I certify that these results are from an actual speed test across BTWI's network taken from a subscriber's equipment who was subscribed to a 50Mbps plan.

Jeffeenhoff

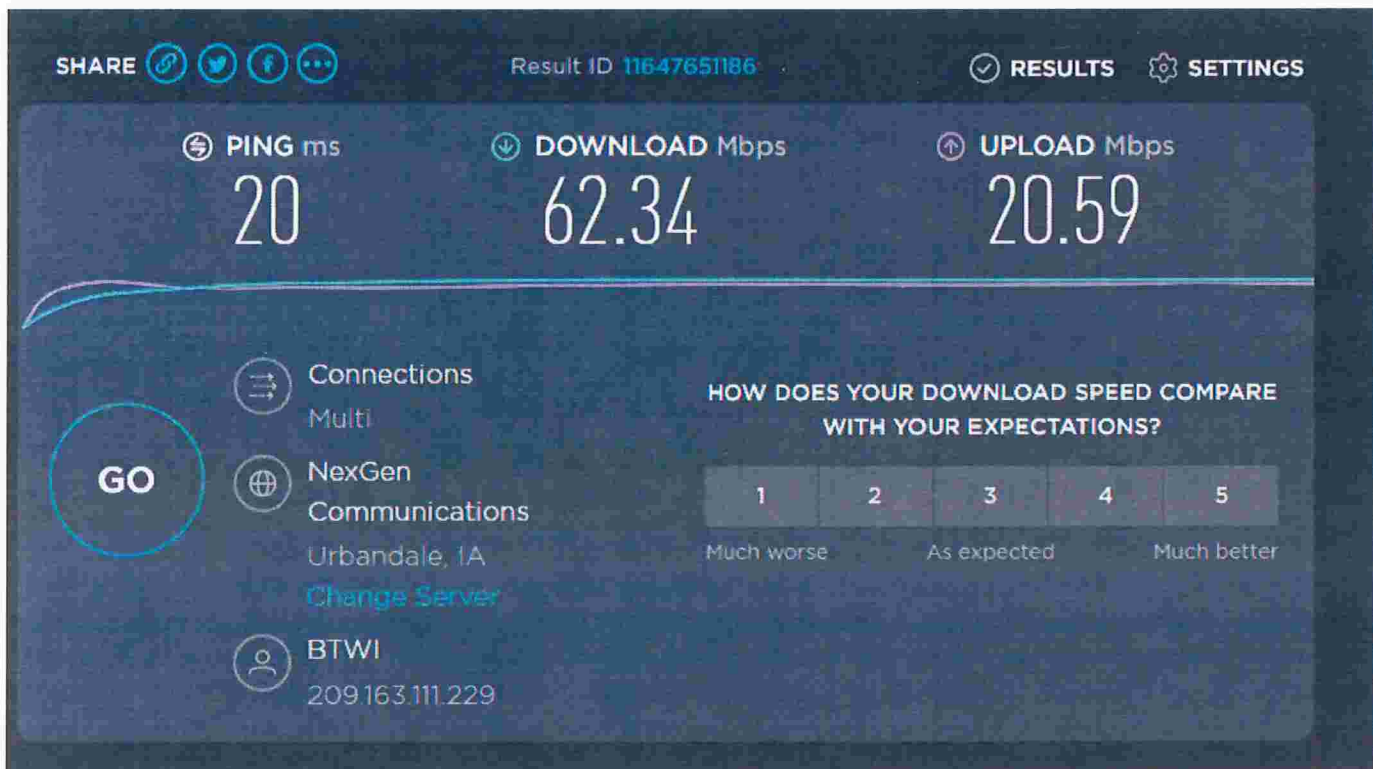


I certify that these results are from an actual speed test across BTWI's network taken from a subscriber's equipment who was subscribed to a 20Mbps plan.

Jeffeenhoff



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



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

City of Minburn

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

August 9, 2021

To Whom it May Concern,

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

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

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

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

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

Janon Douglas

Acting City Clerk

July 28, 2021

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

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

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

²See Iowa Admin. Code r. 129—20.3.

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Office of the Chief Information Officer,
State of Iowa



EXHIBIT A

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

A. RESPONDENT INFORMATION

Company Name	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	tlarsen@mediacomcc.com

C. AFFIRMATION

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

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


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

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

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

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
190059603004001	Correct	1000	50
190059603004002	Correct	1000	50
190059603004003	Correct	1000	50
190059603004006	Correct	1000	50
190059603004007	Correct	1000	50
190059603004008	Correct	1000	50
190059603004009	Correct	1000	50
190059603004010	Correct	1000	50

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

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

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

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

Minburn Telephone Company
Deb Lucht
debl@minburncomm.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 21-1037, 21-1038). **To resolve this matter, the Office requests that your firm provide information concerning your service in the affected Census Blocks as further identified and described below by August 11, 2021.**

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

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

²See Iowa Admin. Code r. 129—20.3.

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Office of the Chief Information Officer,
State of Iowa

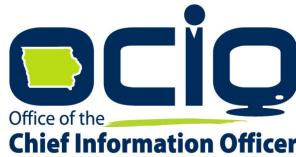


EXHIBIT A

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

A. RESPONDENT INFORMATION

Company Name	Minburn Telephone Company
Address	416 Chestnut Street
City	Minburn
State	Iowa
Zip	50167

B. DESIGNATED CONTACT INFORMATION

Contact Name	Debra Lucht
Contact Phone Number	515-438-2200
Contact Email	debl@minburncomm.com

C. AFFIRMATION

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

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

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

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

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

The census blocks identified on the Affirmation tab as "Split Census Blocks" are 100% served within the Minburn Study Area boundary with FTTH and speeds upto 1Gbps down and 1Gbps up. The census blocks identified with "Transport" contain a fiber which is mainly for transport, however there are a few customers being served from those lines.

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:	Debra Lucht
Title:	CEO/General Manager
Date:	8/6/2021

*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.

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CENSUS BLOCK ID	Do you Facilitate service to more than 10% of the geographic area of the Census Block?	Download Speed	Upload Speed	
190490502002046	Yes	1 GBPS	1 GBPS	Split Census Block
190490502002047	Yes	1 GBPS	1 GBPS	Split Census Block
190490502002048	Yes	1 GBPS	1 GBPS	Split Census Block
190490502002050	Yes	1 GBPS	1 GBPS	Split Census Block
190490502002081	Yes	1 GBPS	1 GBPS	Split Census Block
190490502002082	Yes	1 GBPS	1 GBPS	Split Census Block
190490502002090	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001024	No			Transport
190490505001028	No			Transport
190490505001031	No			Transport
190490505001034	No			Transport
190490505001057	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001065	Yes	1 GBPS	1 GBPS	Split Census Block

190490505001069	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001073	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001074	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001114	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001116	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001118	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001122	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001127	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001135	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001145	Yes	1 GBPS	1 GBPS	Split Census Block
190490501003037	Yes	1 GBPS	1 GBPS	Split Census Block
190490501003038	Yes	1 GBPS	1 GBPS	Split Census Block
190490501003055	Yes	1 GBPS	1 GBPS	Split Census Block
190490501003061	Yes	1 GBPS	1 GBPS	Split Census Block
190490501003062	No			
190490501004031	Yes	1 GBPS	1 GBPS	Split Census Block
190490501004032	Yes	1 GBPS	1 GBPS	Split Census Block
190490501004034	Yes	1 GBPS	1 GBPS	Split Census Block
190490502001000	Yes	1 GBPS	1 GBPS	Split Census Block
190490502001002	Yes	1 GBPS	1 GBPS	Split Census Block
190490502001003	Yes	1 GBPS	1 GBPS	Split Census Block
190490502001004	Yes	1 GBPS	1 GBPS	Split Census Block
190490502001032	Yes	1 GBPS	1 GBPS	Split Census Block
190490502001035	Yes	1 GBPS	1 GBPS	Split Census Block
190490502001038	Yes	1 GBPS	1 GBPS	Split Census Block
190490502001039	Yes	1 GBPS	1 GBPS	Split Census Block
190490502001040	Yes	1 GBPS	1 GBPS	Split Census Block
190490502001051	Yes	1 GBPS	1 GBPS	Split Census Block
190490502002093	Yes	1 GBPS	1 GBPS	Split Census Block
190490502002094	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001170	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001171	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001172	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001176	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001177	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001178	Yes	1 GBPS	1 GBPS	Split Census Block

190490505001179	Yes	1 GBPS	1 GBPS	Split Census Block
190490505001182	Yes	1 GBPS	1 GBPS	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

Panora Communications Cooperative
Andy Randol
andrewrandol@panoratelco.com

To whom it may concern:

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

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

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

²See Iowa Admin. Code r. 129—20.3.

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Office of the Chief Information Officer,
State of Iowa



EXHIBIT A

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

A. RESPONDENT INFORMATION

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

B. DESIGNATED CONTACT INFORMATION

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

C. AFFIRMATION

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

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

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

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

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

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

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

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

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

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

Facilitate

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

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

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

[illegible]

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

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

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

[illegible]

July 28, 2021

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

Rise Broadband
Casey Arnold
carnold@risebroadband.com

OCIO did not receive a response from this provider.

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

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

²See Iowa Admin. Code r. 129—20.3.

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Office of the Chief Information Officer,
State of Iowa



EXHIBIT A

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

A. RESPONDENT INFORMATION

Company Name	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	thomas.hulings@uscellular.com

C. AFFIRMATION

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

Company, consistent with the representations made in this form, and regardless of whether your company's prior reporting to 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
190959602002000	No
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190959602002016	No
190959602002017	No
190959602002018	No
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		
191573701002054	No		
191573701002055	No		
191573701002056	No		
191573701002057	No		
191573701002058	No		
191573701002059	No		
191573701002060	No		
191573701002061	No		
191573701002062	No		
191573701002063	No		
191573701002076	No		
191573701002077	No		
191712906003001	No		
191712906003002	No		
191712906003011	No		
191712906003013	No		
191712906003018	No		
191712906003020	No		
191712906003021	No		
191712906003031	No		
191712906003067	No		
191712906003071	No		
191712906003072	No		
191712906003082	No		
191712906003085	No		
191712906003086	No		
191712906003088	No		

191712906003089	No
191712906003090	No
191712906004044	No
191712906004080	No
191712906004081	No
191712906004084	No
191712906004142	No
191130102001014	No
191130102001016	No
191130102001017	No
191130102001025	No
191130102001026	No
191130102001027	No
191130102001028	No
191130102001029	No
191130102001031	No
191130102001033	No
191130102001034	No
191130102001035	No
191130102001036	No
191130102001038	No
191130102001040	No
190199506002169	No
190199506002172	No
190199506002173	No
190199506002174	No
190199506002175	No
190199506002203	No
191130102001001	No
191130102001002	No
191130102001008	No
191130102001010	No
191130102001012	No
191130102001037	No
191130102001039	No
191130102001041	No

191130102001044	No		
191130102001045	No		
191130102001046	No		
191130102001048	No		
191130102001049	No		
191130102001050	No		
191130102001051	No		
191130102001052	No		
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191130102001072	No		
191130102001075	No		
191130102001088	No		
190199501001150	No		
190199506002017	No		
190199506002018	No		
190199506002019	No		
190199506002040	Yes	25	3
190199506002041	No		
190199506002056	No		
190199506002057	No		
190199506002060	No		
190199506002094	No		
190199506002095	No		
190199506002106	No		
190199506002110	No		
190150206001212	No		
190150206001215	No		
190150206001218	No		
190150206001242	No		
190150206001247	No		
190150206001249	No		
190150206001250	No		
190150206001251	No		
190150206001252	No		

190150206001253	No
190150206001255	No
190150206001256	No
190150206001257	No
190150206001258	No
190150206001259	No
190150206001283	No
190150206001284	No
190150206001288	No
190150206001289	No
190150206001290	No
190150206001291	No
190150206001292	No
190150206001293	No
190150206001332	No
190490502002090	No
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190490505001029	No
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190490505001032	No		
190490505001033	No		
190490505001034	No		
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190490505001046	No		
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190490505001052	No		
190490505001053	No		
190490505001054	No		
190490505001055	Yes	25	3
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190490505001059	No		
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190490505001065	No		
190490505001069	No		
190490505001071	No		
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190490505001078	No		
190490505001079	No		
190490505001080	No		
190490505001081	No		
190490505001082	No		
190490505001083	No		
190490505001089	No		
190490505001098	No		
190490505001099	No		

190490505001104	No
190490505001105	No
190490505001112	No
190490505001113	No
190490505001114	No
190490505001115	No
190490505001116	No
190490505001118	No
190490505001208	No
190730801001117	No
190730801001119	No
190730801001120	No
190730801001153	No
190730801001155	No
190730801001159	No
190730801001161	No
190730801001167	No
190490501003038	No
190490501004034	No
190490501004035	No
190490501004041	No
190490501004042	No
190490502001000	No
190490502001002	No
190490502001003	No
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, 2021.¹ V4 of the Map is based primarily on data submitted to Connected Nation and/or FCC by Communication Service Providers concerning their service capabilities in the State of Iowa² and on informal comments/feedback supplied by interested parties as part of the informal comment/feedback process described above and in which your firm may have participated. V4 of the Map, and a detailed background of the same, can be found at: <https://ocio.iowa.gov/broadband-availability-map-version-4>. Overall, the new map reflects Targeted Service Areas

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

²See Iowa Admin. Code r. 129—20.3.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Office of the Chief Information Officer,
State of Iowa



EXHIBIT A

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

A. RESPONDENT INFORMATION

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

B. DESIGNATED CONTACT INFORMATION

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

C. AFFIRMATION

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

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

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

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

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

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

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

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

[illegible]

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