



Broadband Map v5

Community and Provider Challenge Form

The Office of the Chief Information Officer ("OCIO" or "Office") recently published the Statewide Broadband Availability Map version 5 ("Map v5"). Map v5 is designed to facilitate decisions concerning future spending under federally-funded broadband programs. Because Map v5 does not use the tiered structure envisioned by Iowa Code chapter 8B and because future federally-funded grant opportunities made available by the Office in accordance with Map v5 will not conform to Iowa Code chapter 8B, the map challenge process envisioned under Iowa Code section 8B.10 does not apply. However, the Office is making available a challenge process to allow public input into whether the map accurately reflects broadband coverage as of the publication date of Map v5 (the "As Of" date of Map v5).

The Office utilizes maps and data sources made available by the Federal Communications Commission (FCC) and/or developed or produced by contractors or third parties retained or utilized by the Office. These maps and corresponding data sources represent the status of Broadband in Iowa on the As Of date as reported by Communication Service Providers in Iowa. Unlike prior broadband coverage maps, Map v5 identifies broadband coverage by individual locations, making Map v5 far more granular than prior maps that displayed eligibility at the census block level.

Challenges to Map v5 will be based on presence or reliability of service and/or speed. Challengers will be required to provide for every location challenged an address and corresponding IA Location ID, to the extent a Location ID is available on the map. Challenges without this information may not be evaluated.

Every location on Map v5 reflects a status of 'likely eligible' or 'likely ineligible.' This status is based solely on speed and technology type. The eligibility of any particular location is contingent on the requirements associated with the federal funding being used to fund future Notices of Funding Availability ("NOFAs"). Eligibility determinations are subject to change over time. In addition, eligibility designations in no way guarantee facilitation of service in the future through state- or federally-funded broadband builds.

On August 2, 2022, the Office posted the final version of Broadband Availability Map v5 and opened a 30-calendar-day challenge window wherein anyone aggrieved or adversely affected by mapping determinations may challenge the Office's final determination of whether service at a particular location is accurately reflected.

This form is for PROVIDERS and COMMUNITIES only. Resident challengers should fill out the form via the Map on the website.

You must check next to each row that you have read and understood the terms of the challenge process. Without this acknowledgment, the appeal will not be evaluated.

Use the tab titled "Challenge Form" to challenge any particular location. If you would like to report an address not presenting on the map, please use the tab titled "Location Not Present on Map." You can also use this tab to report when the location is not presenting at the correct area.

Challenger acknowledges the following (click checkbox to acknowledge):

The information on the Map may be challenged for conditions existing as of August 2, 2022 (the "As Of" date). Challenges based on changes occurring to broadband service after the As Of date will not be considered.

When submitting a challenge, evidence must be submitted for every location challenged in support of changing the likely eligible or likely ineligible status. Documentation that is speculative, generalized, or vague will not be sufficient. You may use the Sworn Statement/Survey template provided. Supporting documentation must be provided in one pdf. Reference to the page number of the supporting evidence within the pdf must be noted in Challenge Form. Challenged locations without a referenced page will not be evaluated.

The Office reserves the right to reject challenges for a variety of reasons, including but not limited to:

- >> Challenges claiming buildout at a future date;
- >> Challenges received reflecting incomplete information, including lacking IA Location ID;
- >> Challenges to a provider's service that are submitted without supporting evidence;
- >> Multiple challenge forms submitted by a provider or a community;
- >> Challenges received after September 1, 2022;
- >> Challenges received without all checkboxes marked indicating acknowledgement of the terms.

The Office will notify affected parties by posting to the website any notice of challenge received. Final agency decisions shall become final unless within 30 days of the posting of a final decision, a challenger or person or party aggrieved or adversely affected requests a contested case proceeding pursuant to Iowa Administrative Code chapter 129-6.



Broadband Map V5 Provider/Community Challenge Form

A. CHALLENGER INFORMATION	
Entity/Community Name	Citizens Mutual Telephone Cooperative
FRN (Provider Only)	3733029
Address	114 W Jefferson St
City	Bloomfield
State	IA
Zip	52537
B. DESIGNATED CONTACT INFORMATION	
Contact Name	Vince Tyson
Contact Phone Number	641-664-2074
Contact Email	vtyson@mycmtech.com
C. EXPLANATION	
To the extent you believe additional explanation is required to ensure that you are communicating full and accurate information, please provide narrative to further explain your challenge.	
Citizens Mutual believes the DSL rate and reach are overstated in rural areas for some locations outside our incumbent service area. Because we do not know the location of each and every DSL access node, we are challenging the locations we believe are highly unlikely to have DSL service at the speeds indicated. It is our hope the OCIO can request specific information for the DSL provider that either confirms or denies their ability to provide the speeds. The ability to provide the speed can easily be determined if the provider indicates the copper loop length from the address location to the serving DSL electronics node.	
D. ATTESTATION	
By signing and submitting this form, the authorized representative attests that to the best of the authorized representatives knowledge and belief, the information submitted through this challenge form is true and accurate, and the form is signed under the pains and penalties of perjury. By typing your name, you are affixing your signature to this form and attesting to the accuracy of the information submitted herein.	
Authorized Signature:	
Title:	General Manager

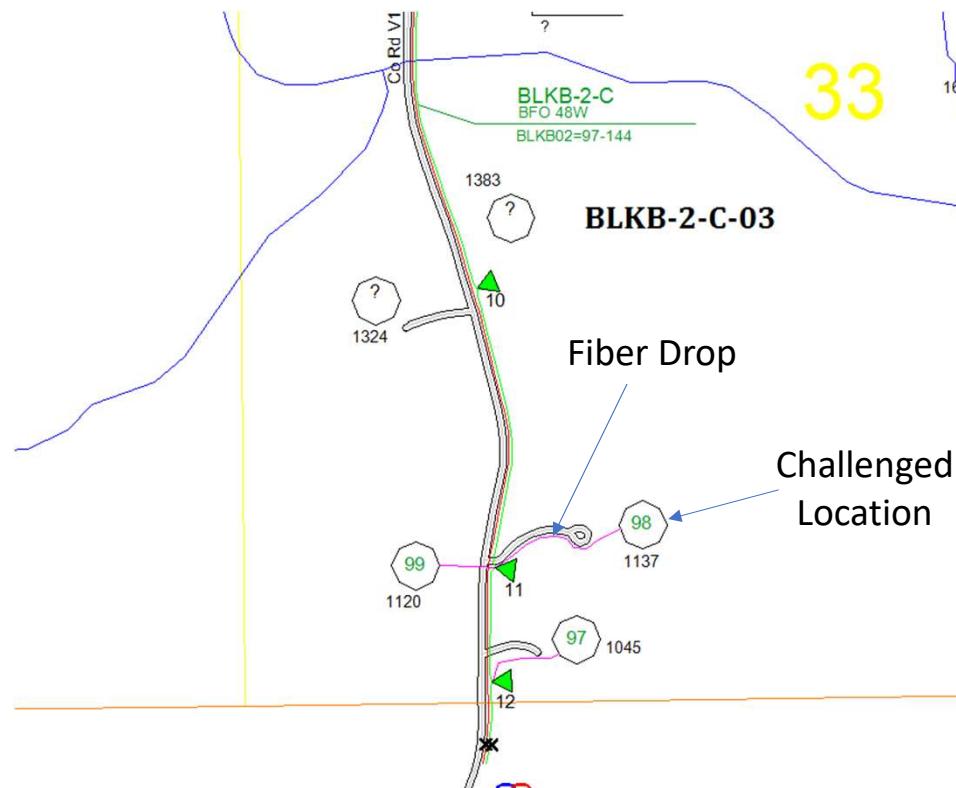
Date:	9/2/2022			
-------	----------	--	--	--

IA Location ID	Street Address	City	State	ZIP Code	No. of Units at address (house, multi-residential units)	Basis for Challenge	Challenge Detail	Fastest download speed in Mbps for this type of service (Enter 0-2000)	Fastest upload speed in Mbps for this type of service (Enter 0-2000)	Technology Type	Service Conditions The Map Should Reflect		Evidence: Upload all supporting information for this location in a single PDF. Enter the page number(s) in the cell below identifying the exact location of the proof in the PDF.					
											Is this location served, underserved, or unserved?		Technology Type		Sworn Statement/ Survey Response	Broadband Offering location	Speed test at this location	Other
99452	137 LAKE ROAD	DRAKESVILLE	IA	52552	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							2	
343603	11015 FIR AVENUE	DRAKESVILLE	IA	52552	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							3	
141860	17211 42ND STREET	OTTUMWA	IA	52501	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							4	
618268	17553 CLAY AVENUE	BLOOMFIELD	IA	52537	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							5	
665902	10907 FIR AVENUE	DRAKESVILLE	IA	52552	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							6	
668909	19851 30TH STREET	BLAKESBURG	IA	52536	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							7	
891623	12105 286TH STREET	BLOOMFIELD	IA	52537	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							8	
1110973	19146 30TH STREET	BLAKESBURG	IA	52536	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							9	
495799	18949 30TH STREET	OTTUMWA	IA	52501	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							10	
817299	1045 LAKE ROAD	DRAKESVILLE	IA	52552	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							11	
108003	11386 152ND STREET	UNIONVILLE	IA	52594	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							12	
184274	2004 42ND STREET	PULASKI	IA	52579	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							13	
1158269	2118 235TH STREET	OTTUMWA	IA	52570	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							14	
64986	18852 30TH STREET	OTTUMWA	IA	52501	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							15	
357173	18281 30TH STREET	OTTUMWA	IA	52501	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							16	
790677	11075 ROUTE J40	MILTON	IA	52570	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							17	
460024	17505 42ND STREET	OTTUMWA	IA	52501	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							18	
596353	1120 LAKE ROAD	DRAKESVILLE	IA	52552	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							19	
1079651	11742 42ND STREET	OTTUMWA	IA	52501	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							20	
1367930	19726 30TH STREET	BLAKESBURG	IA	52536	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							21	
209084	12613 293RD STREET	BLOOMFIELD	IA	52537	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							22	
873754	18540 30TH STREET	BLAKESBURG	IA	52536	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							23	
564384	11388 152ND STREET	BLAKESBURG	IA	52536	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							24	
1218062	11181 188TH AVENUE	DRAKESVILLE	IA	52552	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							25	
1220217	1962 180TH AVENUE	BLAKESBURG	IA	52536	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							26	
1520097	12024 FLAX BOULEVARD	DRAKESVILLE	IA	52552	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							27	
1267005	27711 CLAY AVENUE	BLOOMFIELD	IA	52537	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							28	
1326172	17119 42ND STREET	OTTUMWA	IA	52501	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							29	
31405	19262 SOAP CREEK	OTTUMWA	IA	52501	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							30	
405984	1595 200TH AVENUE	BLAKESBURG	IA	52536	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							31	
457162	1063 194TH AVENUE	BLAKESBURG	IA	52536	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							32	
587175	1104 180TH AVENUE	OTTUMWA	IA	52501	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							33	
1354116	19238 SOAP CREEK	OTTUMWA	IA	52501	1	13-Provider not reflected on the map	Provider only. The Map does not correctly reflect service that I facilitate to this location	1000	1000	Fiber							34	
140397	13134 ROUTE J40	MILTON	IA	52570	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							35
154223	12862 ROUTE J40	MILTON	IA	52570	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							35
223201	11386 152ND STREET	MILTON	IA	52570	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							35
374461	14515 235TH STREET	MILTON	IA	52570	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							35
384551	13875 235TH STREET	MILTON	IA	52570	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							35
1036914	14682 ROUTE J40	MILTON	IA	52570	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							35
1129603	13259 230TH STREET	MILTON	IA	52570	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							35
113019	14212 ROUTE J40	MILTON	IA	52570	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							35
116318	14676 ROUTE J40	MILTON	IA	52570	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							35
138221	14832 ROUTE J40	MILTON	IA	52570	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							35
1454695	14322 ROUTE J40	MILTON	IA	52570	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							35
106984	12487 ROUTE J40	MILTON	IA	52570	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							36
195489	21261 CLOVER ROAD	MILTON	IA	52570	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							36
461600	12065 ROUTE J40	MILTON	IA	52570	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							36
617915	1471 13TH STREET	ELDON	IA	52570	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							36
707030	1072-1078 ROUTE J40	DOUDS	IA	52551	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							36
764922	13801 CLOVER ROAD	MILTON	IA	52570	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							36
1011624	17454 WHISKEY RIDGE	ELDON	IA	52557	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							36
133693	12104 235TH STREET	BLAKESBURG	IA	52536	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							37
231686	1450 87TH STREET	BLAKESBURG	IA	52536	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							37
252625	10525 240TH AVENUE	BLAKESBURG	IA	52536	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							37
259300	14332 WHISKEY RIDGE	BLAKESBURG	IA	52536	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							37
2779449	26022 BLADENSBURG	BATAVIA	IA	52533	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							37
314450	471 13TH STREET	ELDON	IA	52554	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							37
450317	49662 BLADENSBURG	OTTUMWA	IA	52501	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							37
471850	7351 189TH STREET	IA		52531	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							37
430898	7377 189TH STREET	ALBIA	IA	52531	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							37
502633	7313 189TH STREET	ALBIA	IA	52531	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							37
518629	14945 87TH STREET	BLAKESBURG	IA	52536	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							37
55405	1481 240TH AVENUE	BLAKESBURG	IA	52534	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							37
559694	1336 28TH STREET	ELDON	IA	52554	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/20)							37
624962	1336 16TH STREET	ALBIA	IA	52531	1	5-Reported service type (e.g., wireless/FTTH) does not exist	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 10							

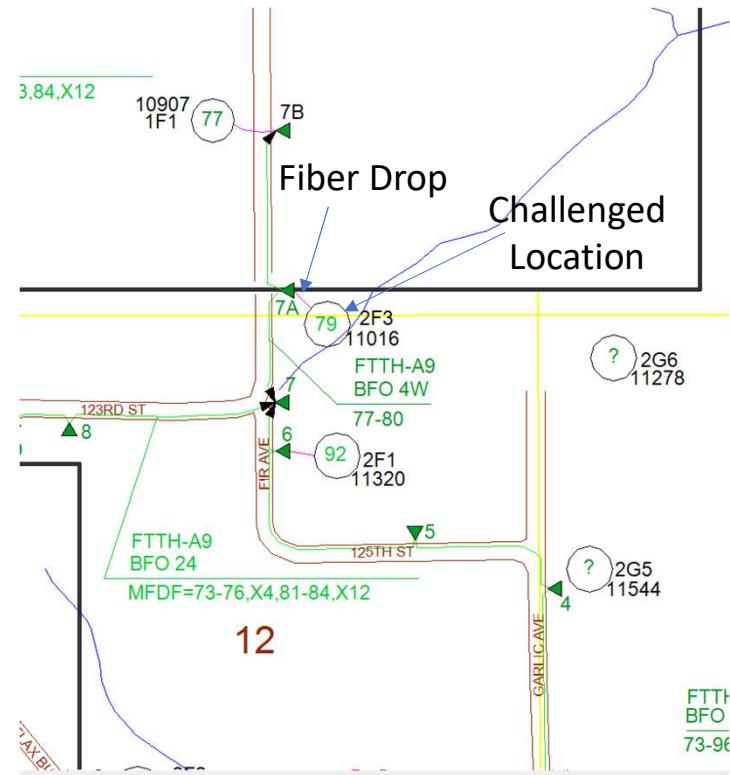
Citizens Mutual Telephone Cooperative Challenge Location Supporting Documentation

- Citizens Mutual is challenging locations in two general groups:
 - Locations that are within our service area that is shown as 'likely eligible' but is either currently connected to our fiber network or is within a distance that a connection can be established within 10 business days (installation of a drop cable), upon request by the business/resident. Map clips are provided as the supporting documentation that fiber is either present at the location or nearby.
 - Locations that are outside our service area and we believe lacks adequate broadband service and Citizens Mutual is interested in applying for grant funds. These locations are reported as being served by DSL at speeds greater than 100 mbps. Citizens Mutual does not believe network connections exist that can facilitate these speeds based upon our proximity and field work in these areas. Therefore, we are hopeful the OCIO can request the reporting carrier provide the relevant information (copper loop length, gauge of cable, etc) that would verify the DSL speeds that are attainable at these locations to support either their reported speeds or Citizens Mutual's challenge.

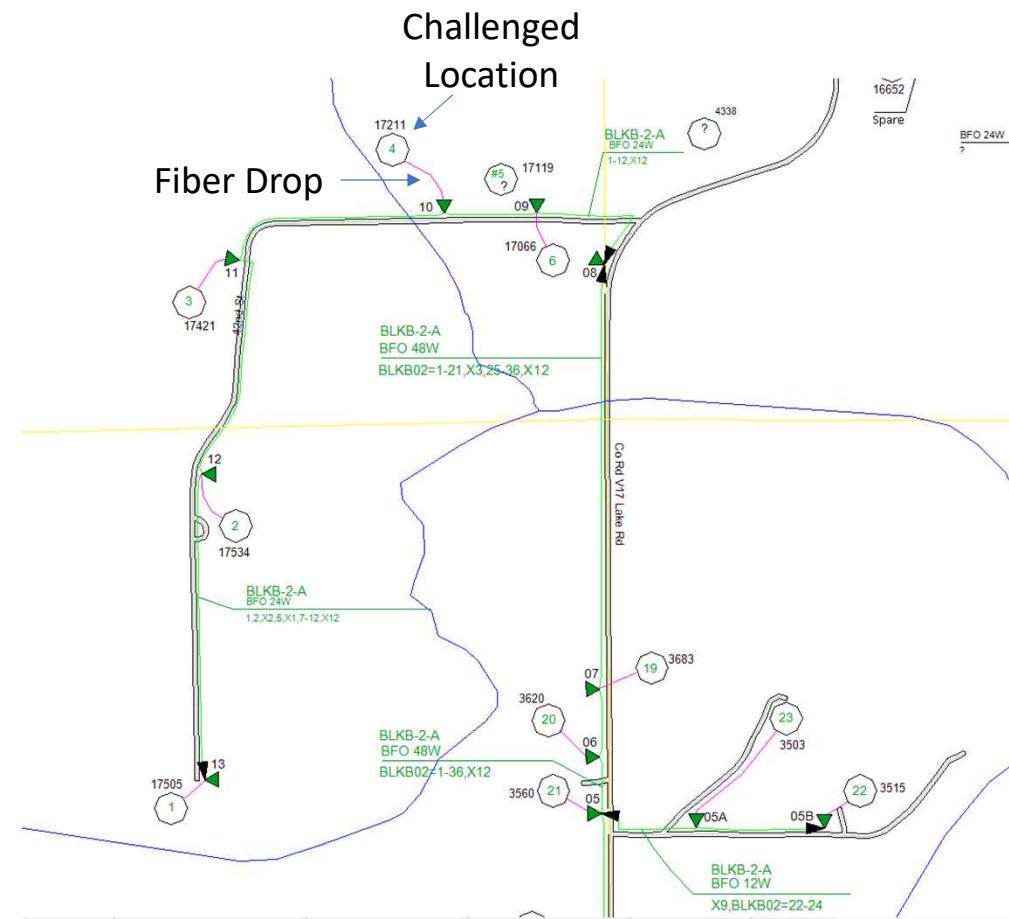
This location is currently connected to Citizens Mutual's fiber network.



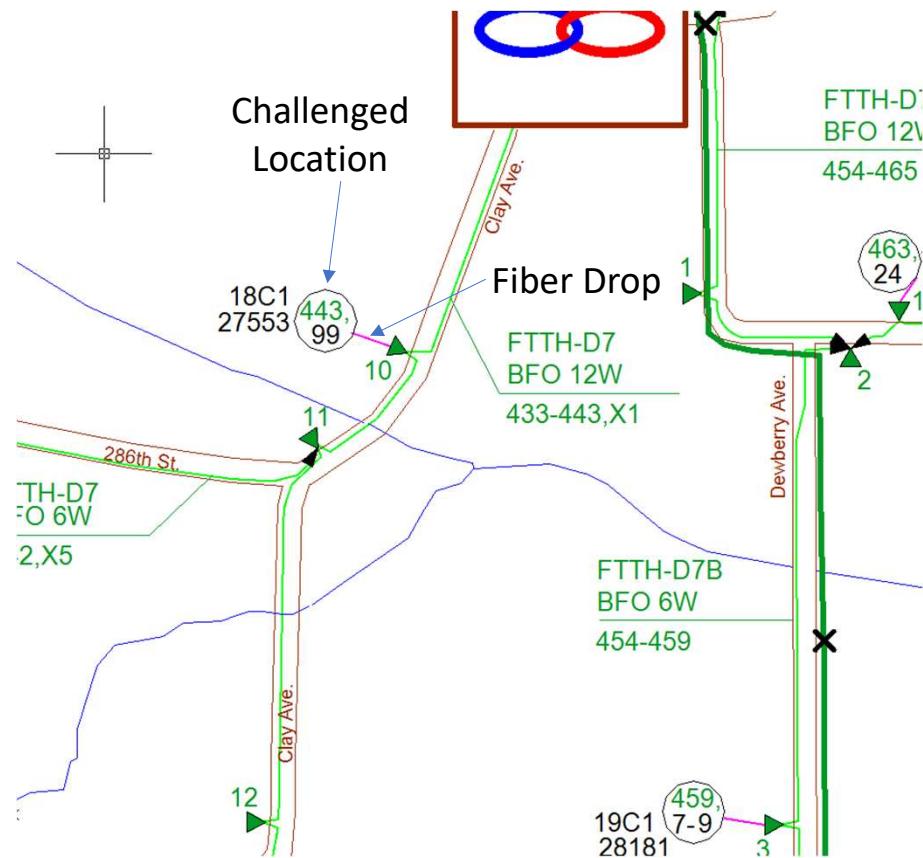
This location is currently connected to Citizens Mutual's fiber network.



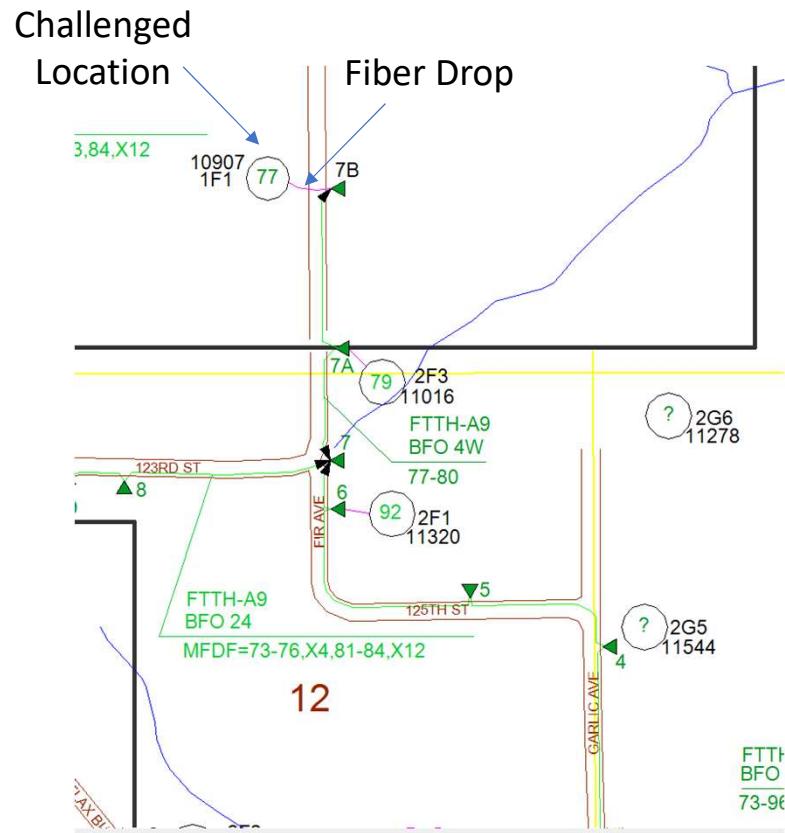
This location is currently connected to Citizens Mutual's fiber network.



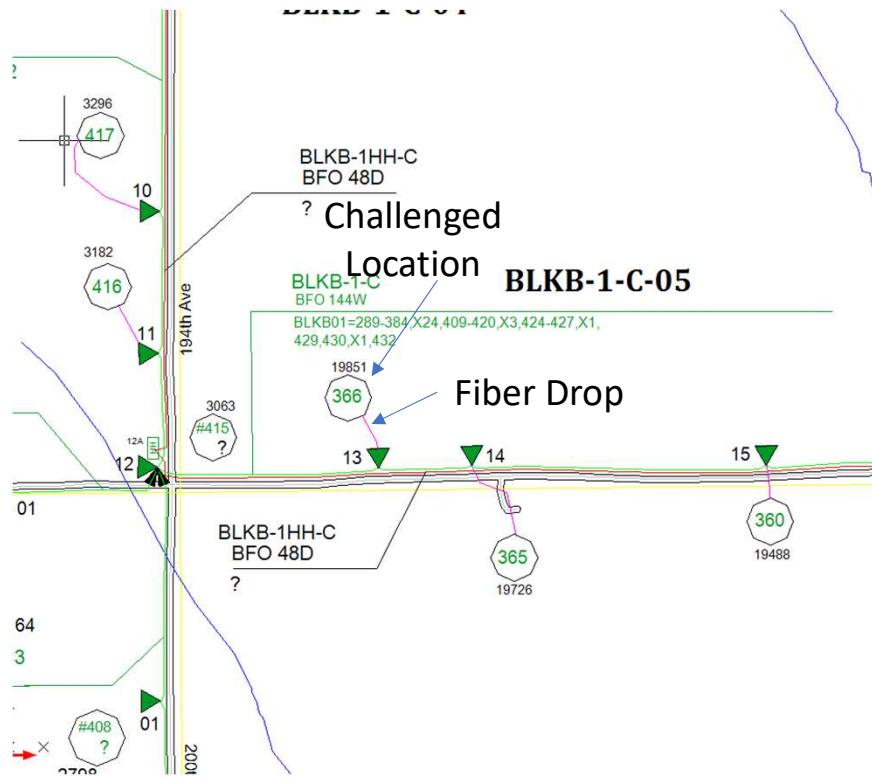
This location is currently connected to Citizens Mutual's fiber network.



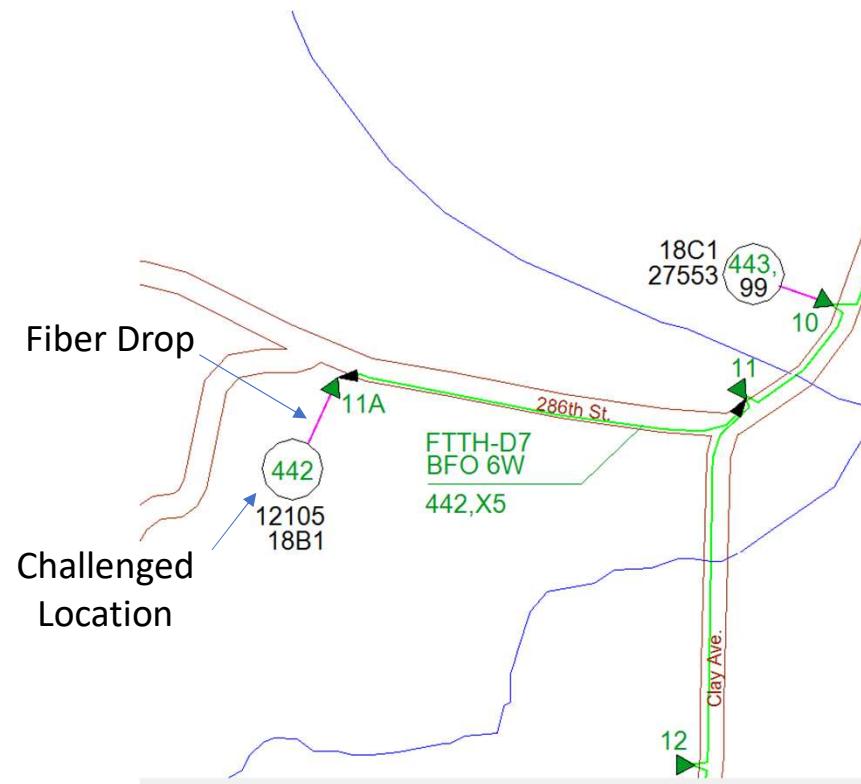
This location is currently connected to Citizens Mutual's fiber network.



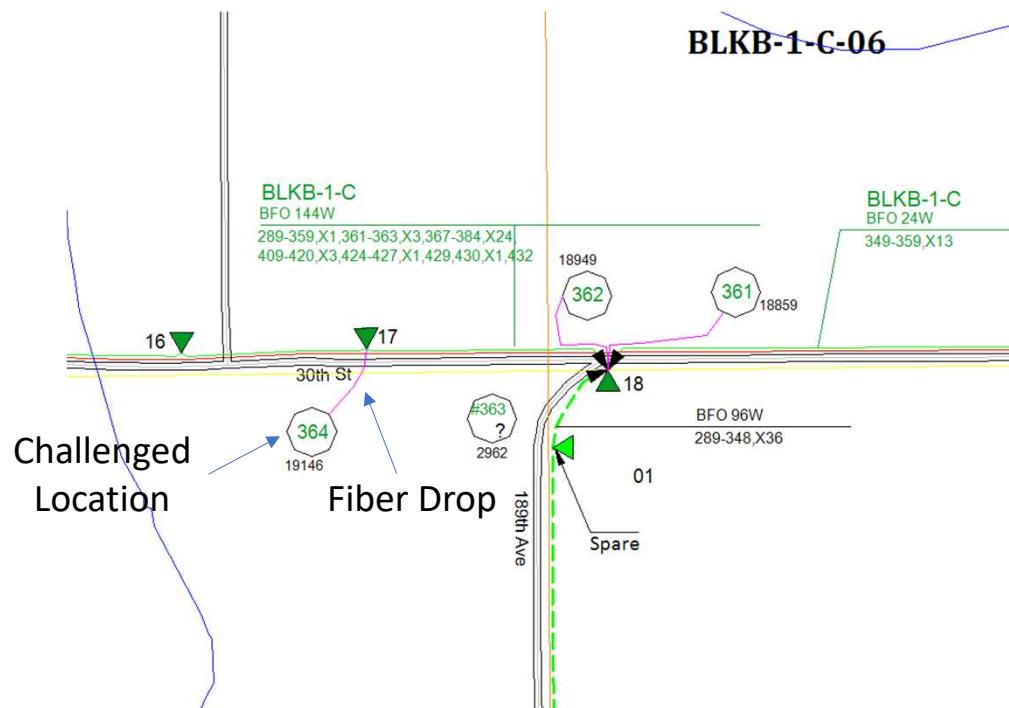
This location is currently connected to Citizens Mutual's fiber network.



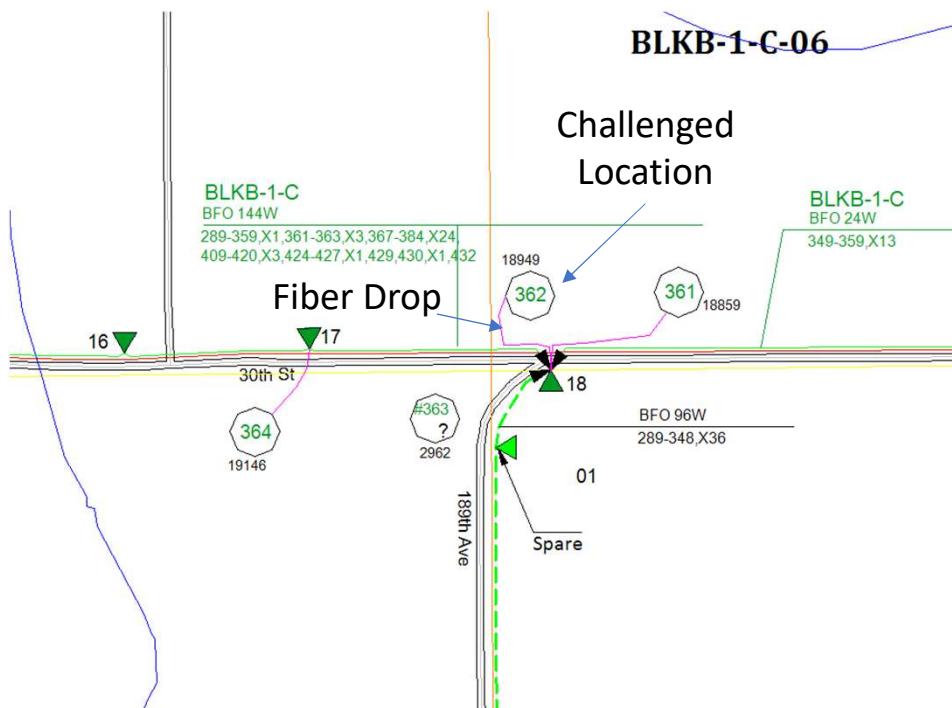
This location is currently connected to Citizens Mutual's fiber network.



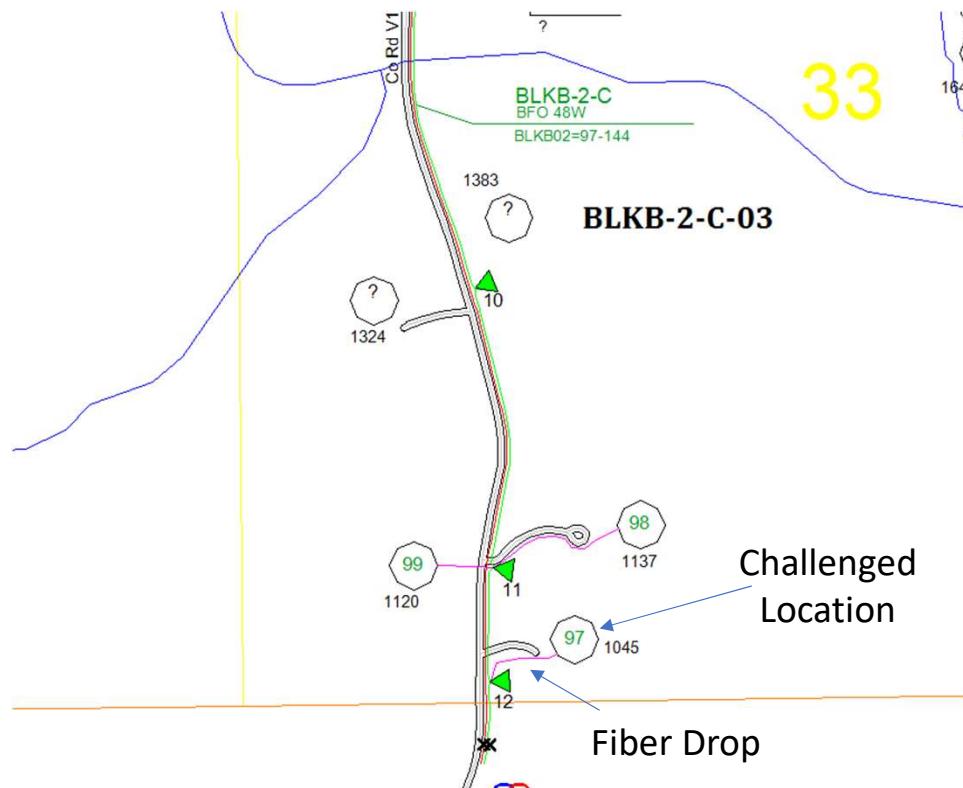
This location is currently connected to Citizens Mutual's fiber network.



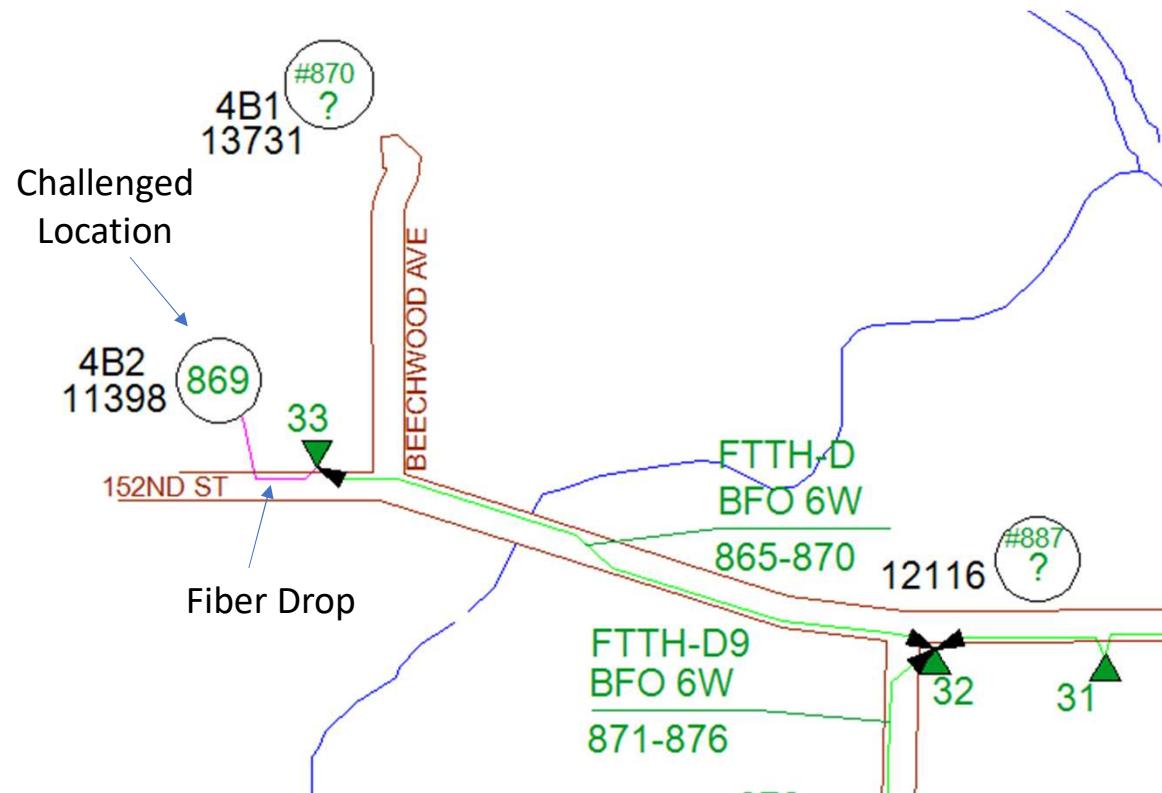
This location is currently connected to Citizens Mutual's fiber network.



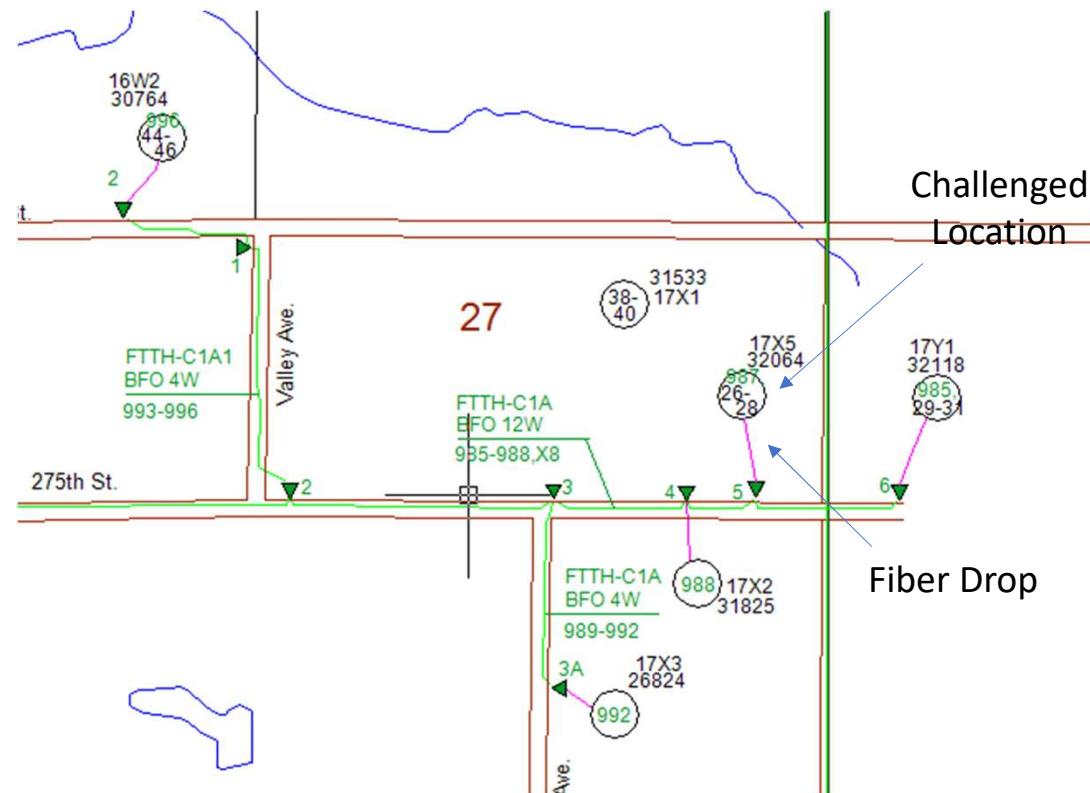
This location is currently connected to Citizens Mutual's fiber network.



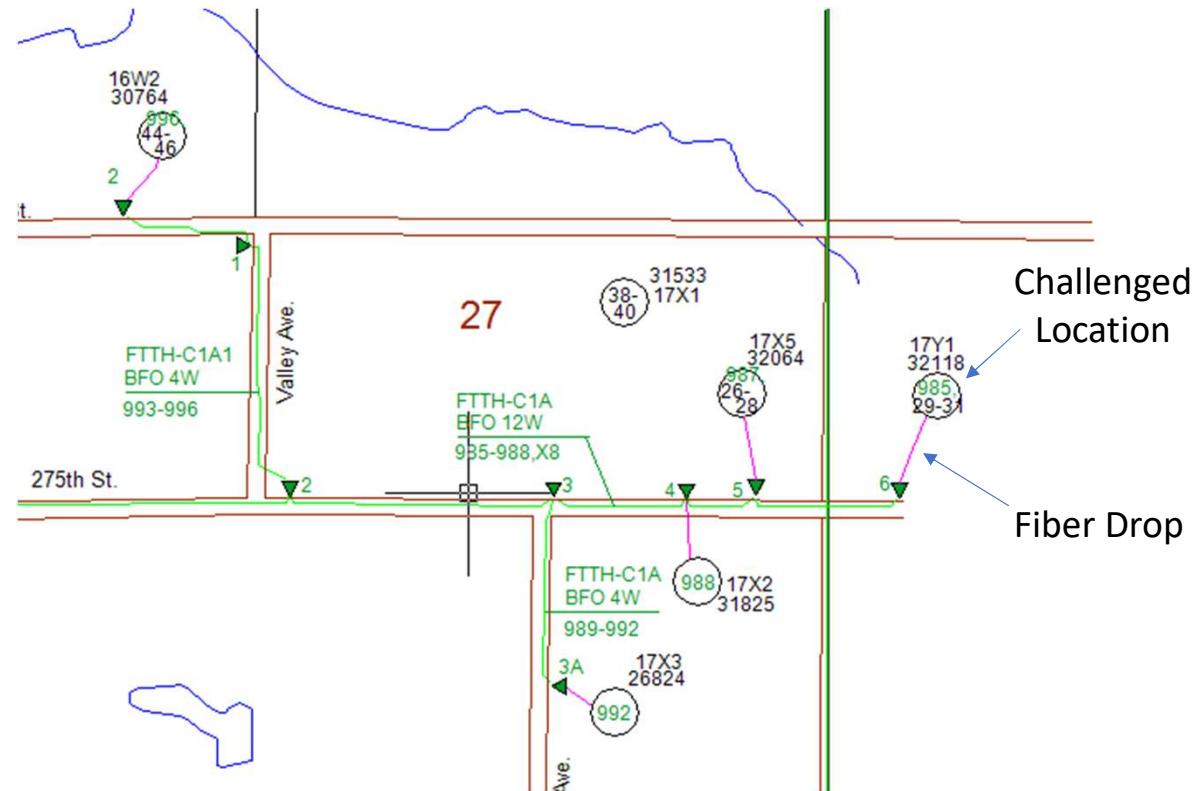
This location is currently connected to Citizens Mutual's fiber network.



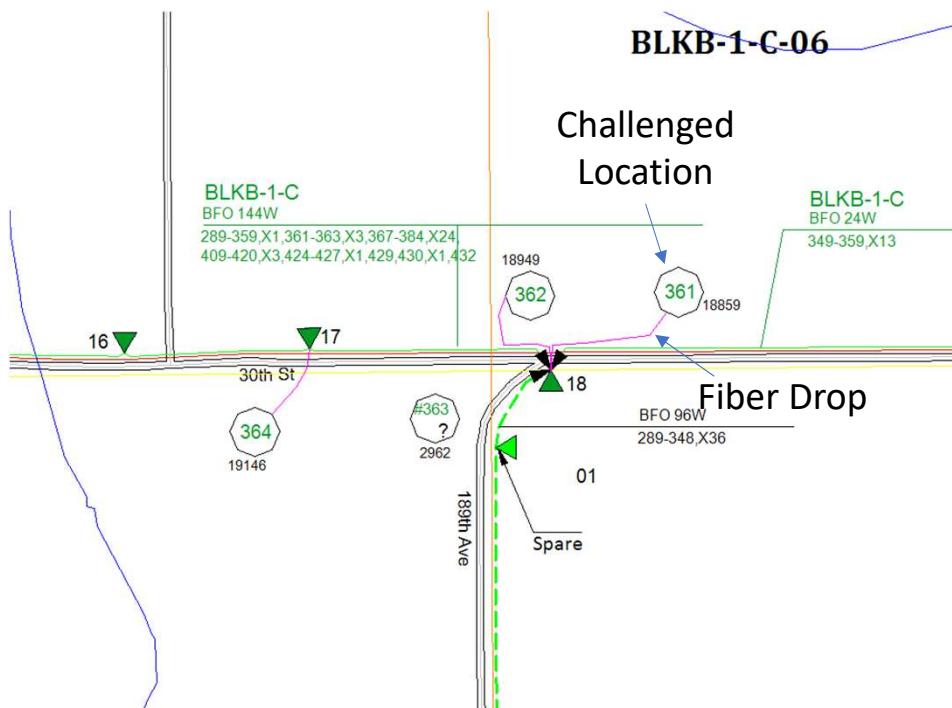
This location is currently connected to Citizens Mutual's fiber network.



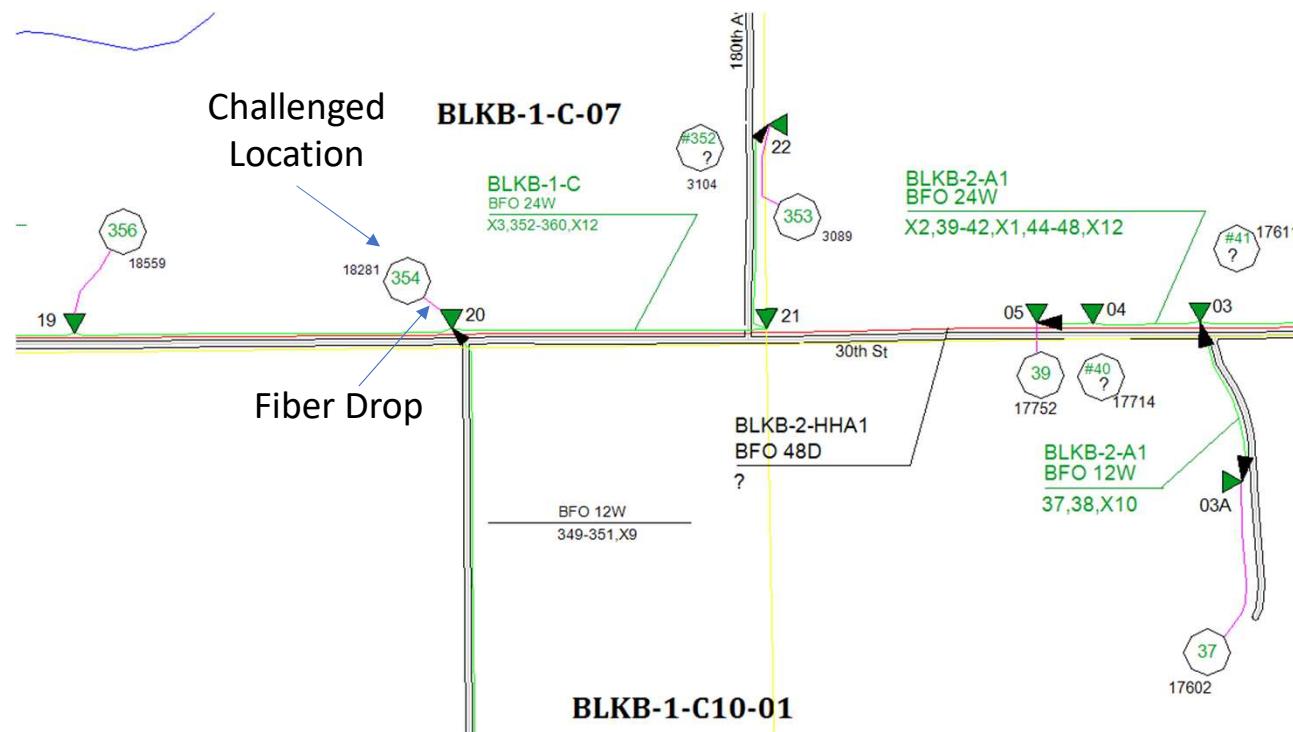
This location is currently connected to Citizens Mutual's fiber network.



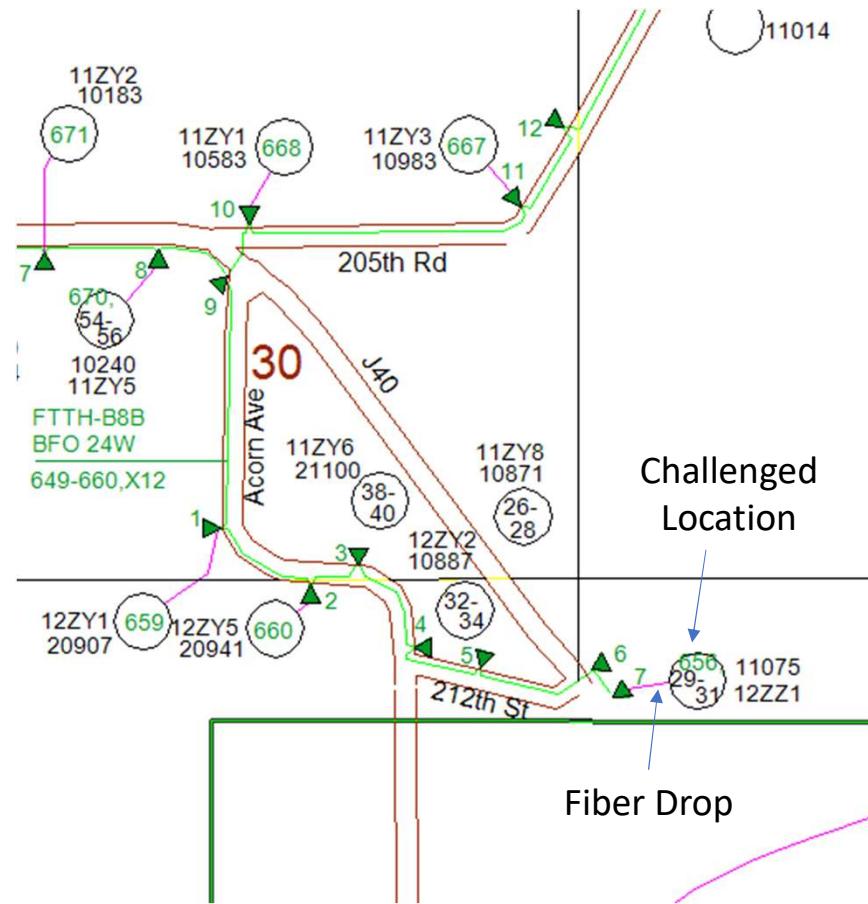
This location is currently connected to Citizens Mutual's fiber network.



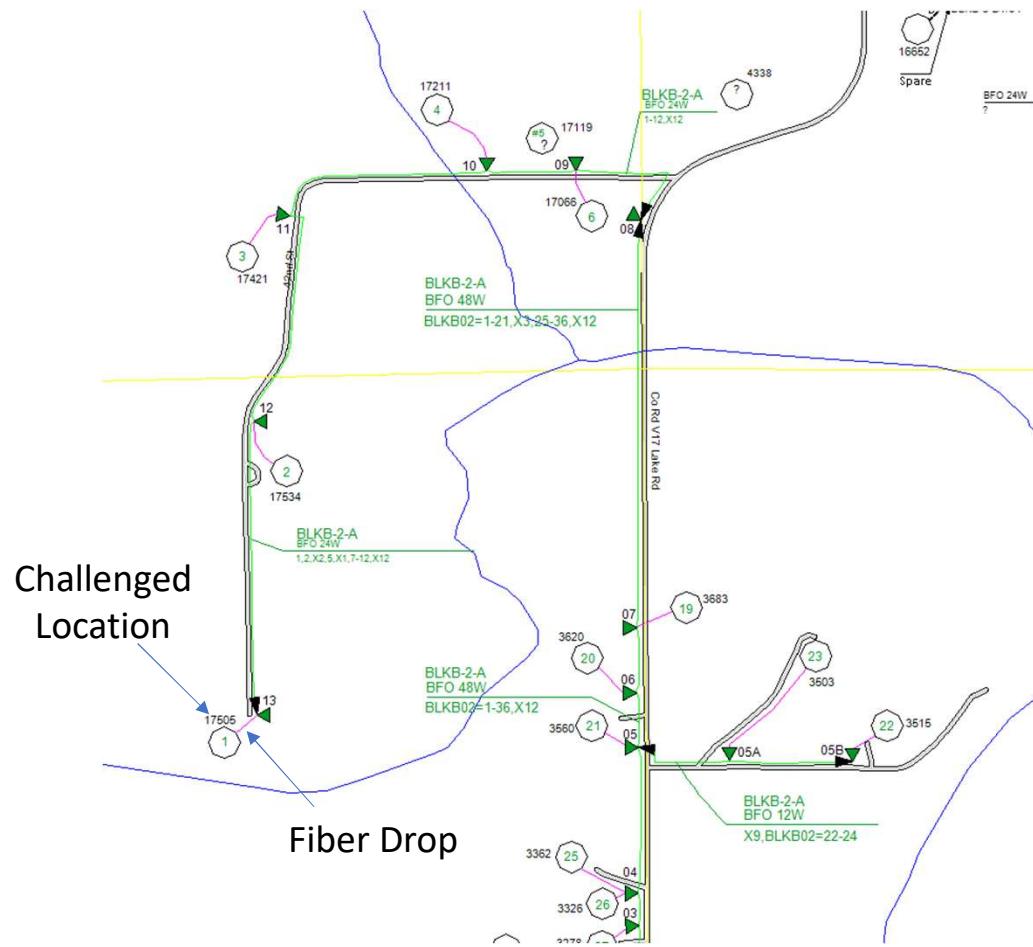
This location is currently connected to Citizens Mutual's fiber network.



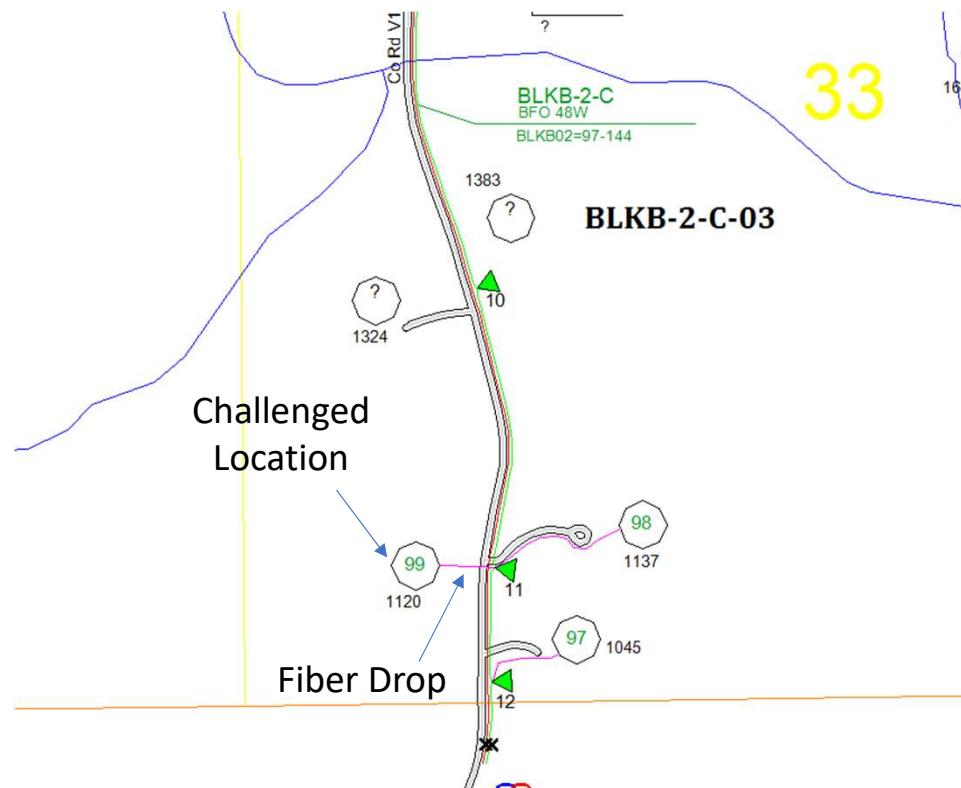
This location is currently connected to Citizens Mutual's fiber network.



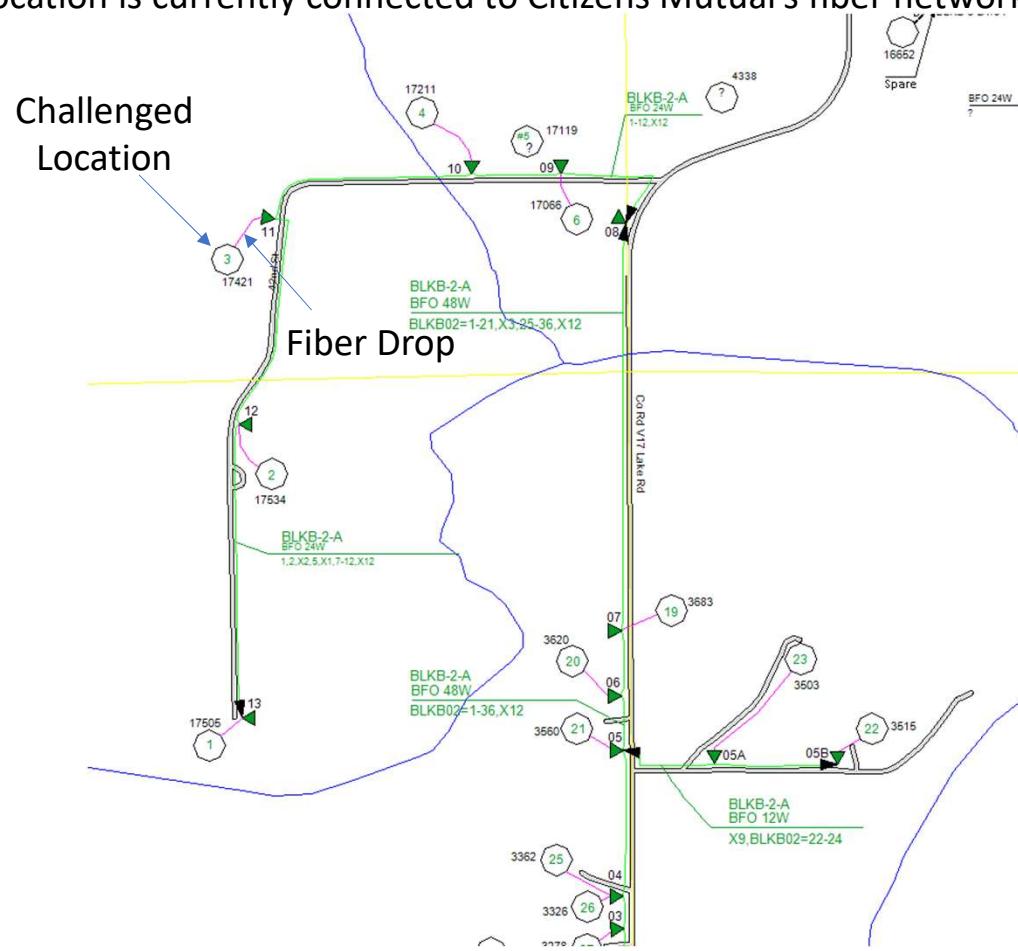
This location is currently connected to Citizens Mutual's fiber network.



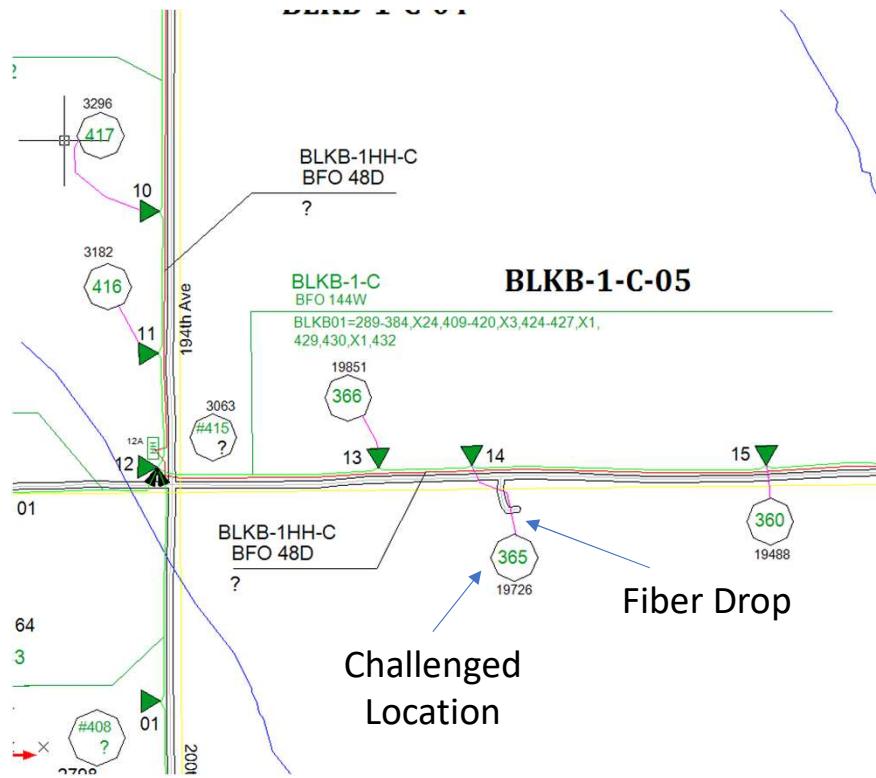
This location is currently connected to Citizens Mutual's fiber network.



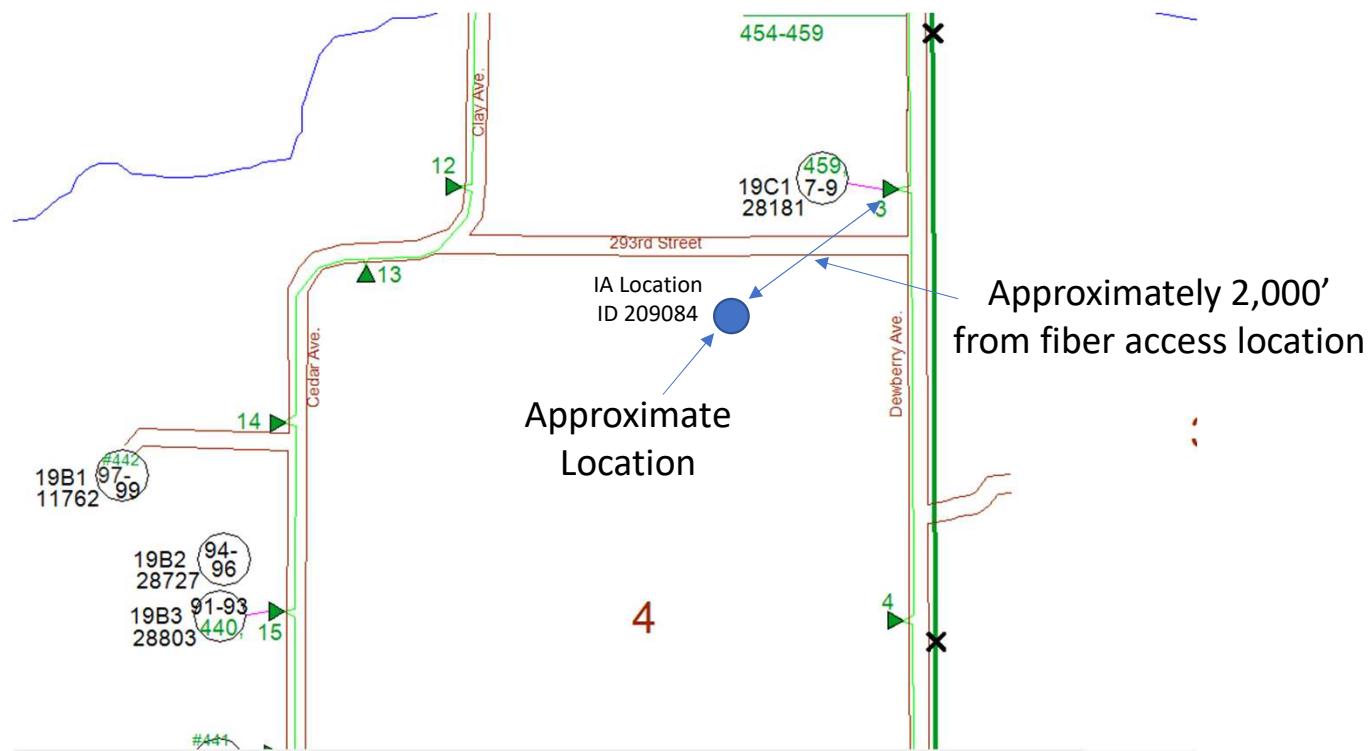
This location is currently connected to Citizens Mutual's fiber network.



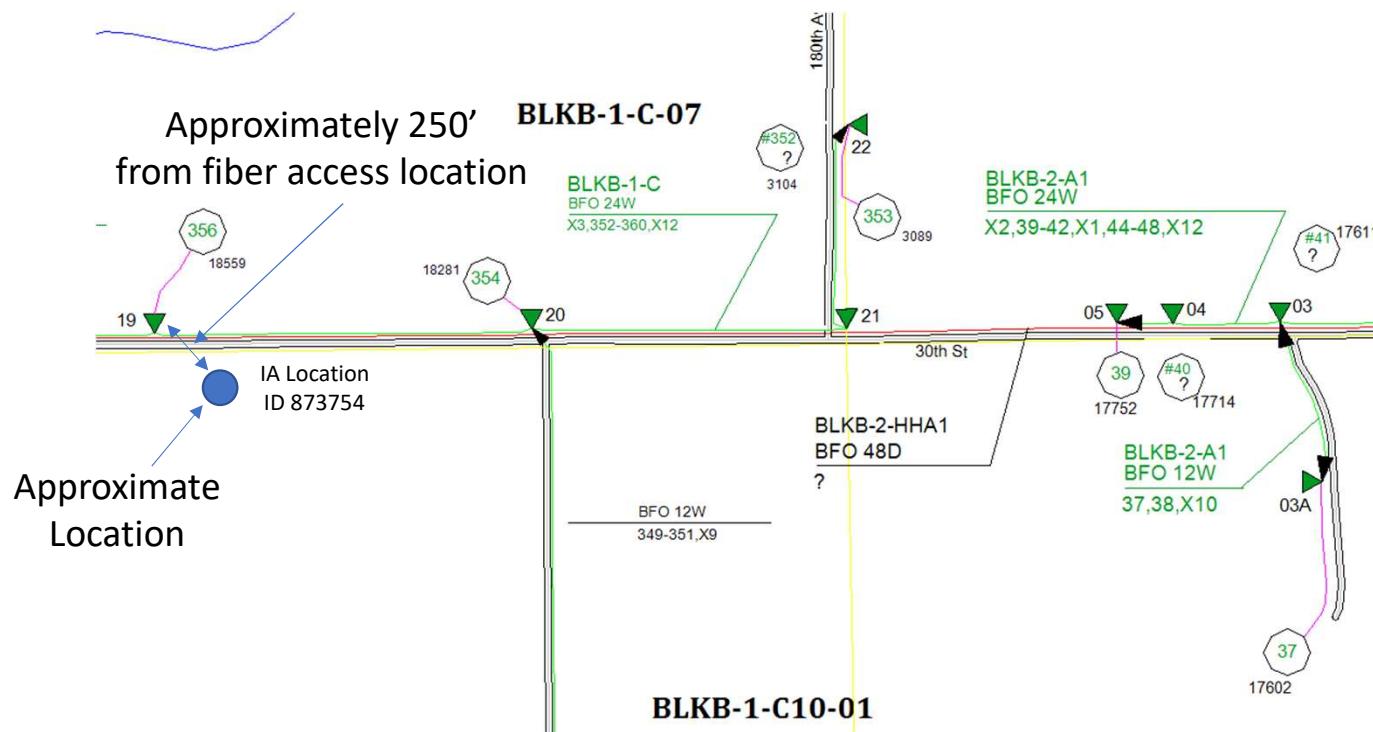
This location is currently connected to Citizens Mutual's fiber network.



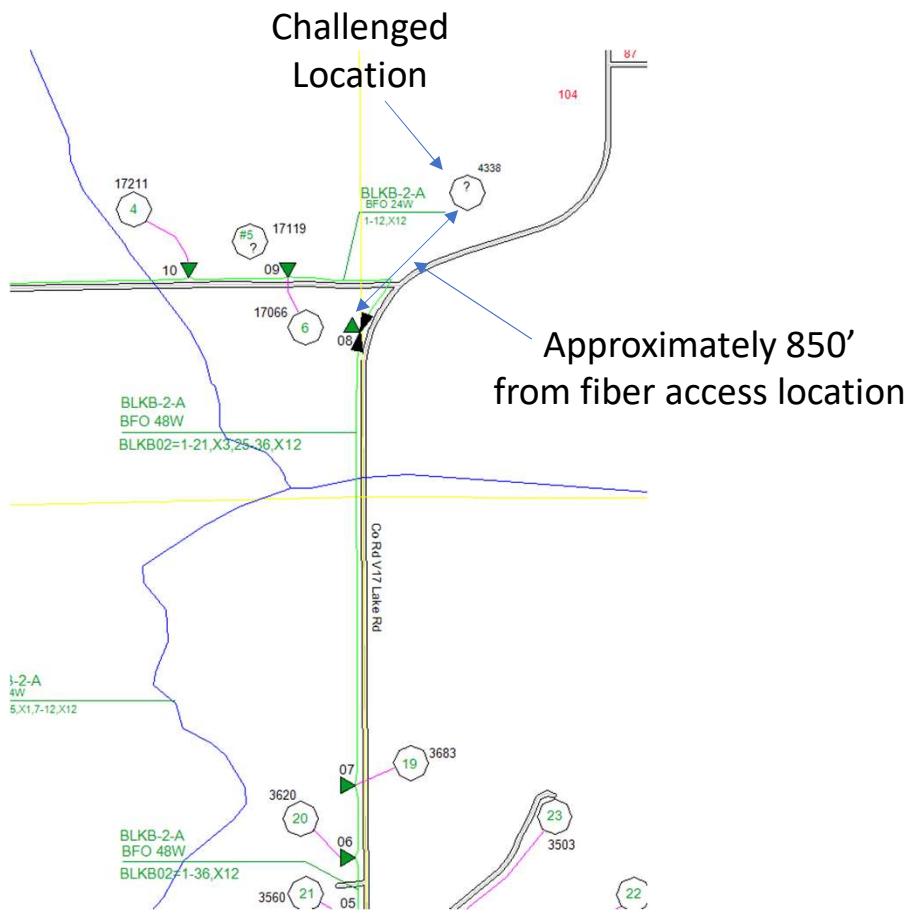
This location is within Citizen Mutual's service area. A drop cable would need to be placed to provide service and can be accomplished within 10 business days.

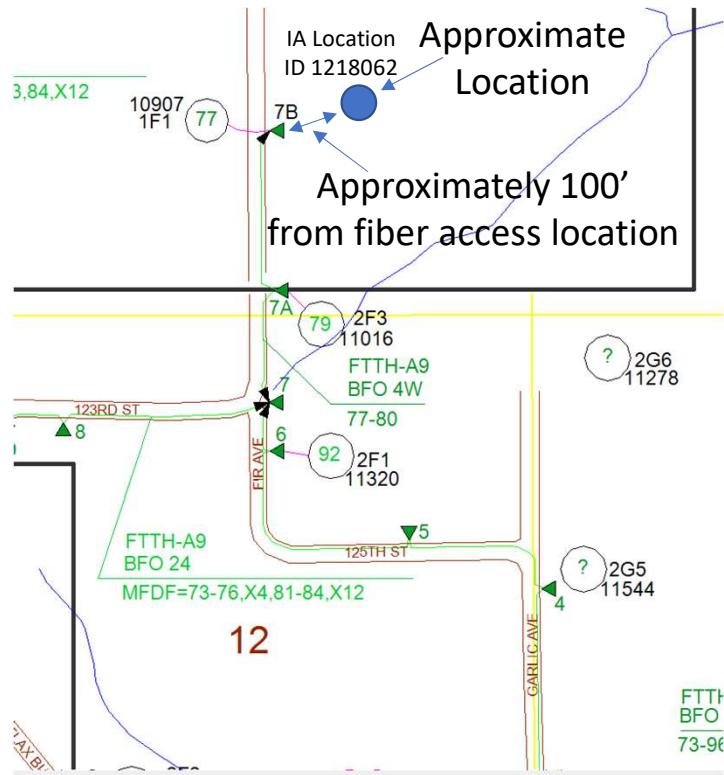


This location is within Citizen Mutual's service area. A drop cable would need to be placed to provide service and can be accomplished within 10 business days.

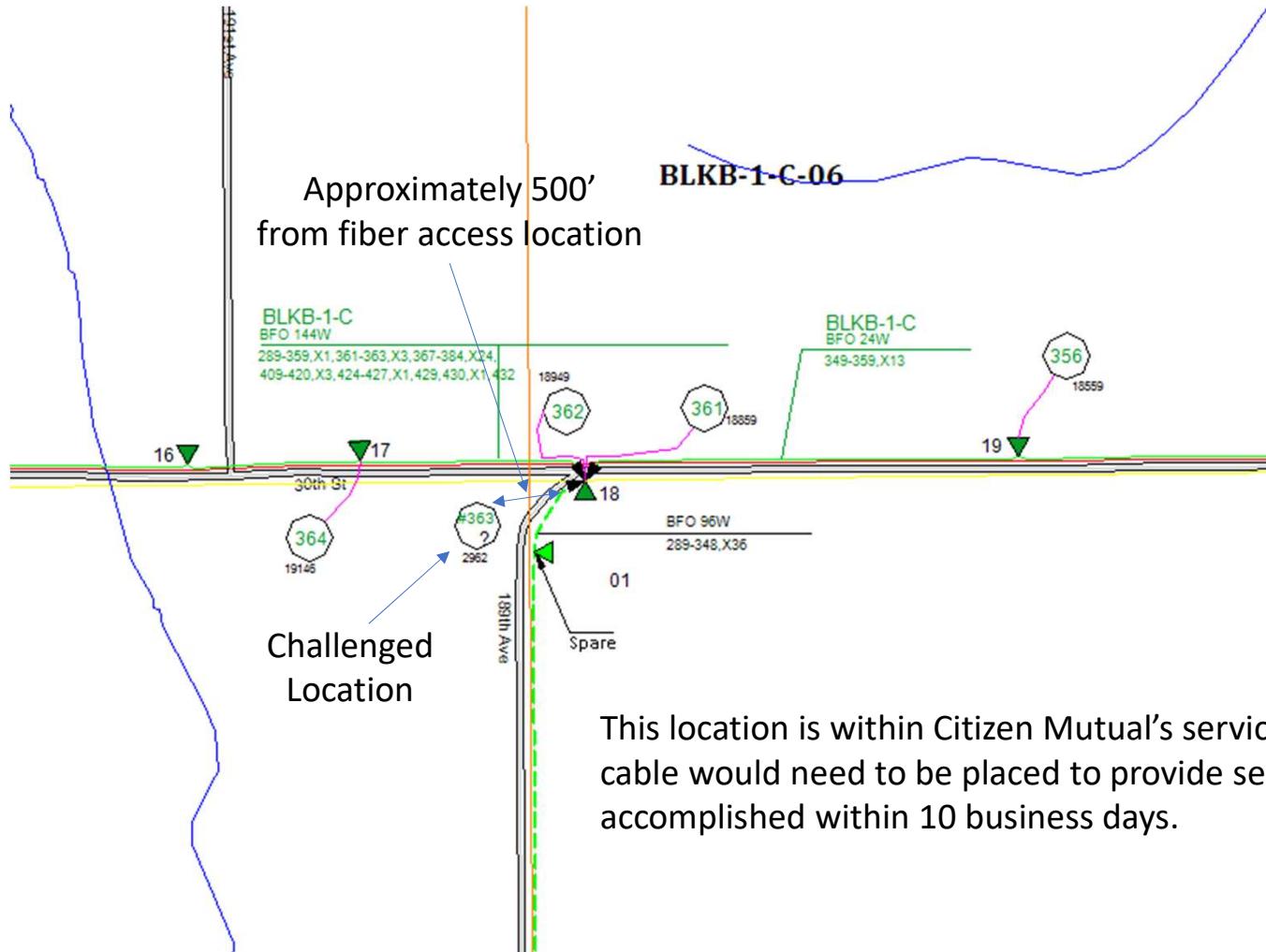


This location is within Citizen Mutual's service area. A drop cable would need to be placed to provide service and can be accomplished within 10 business days.





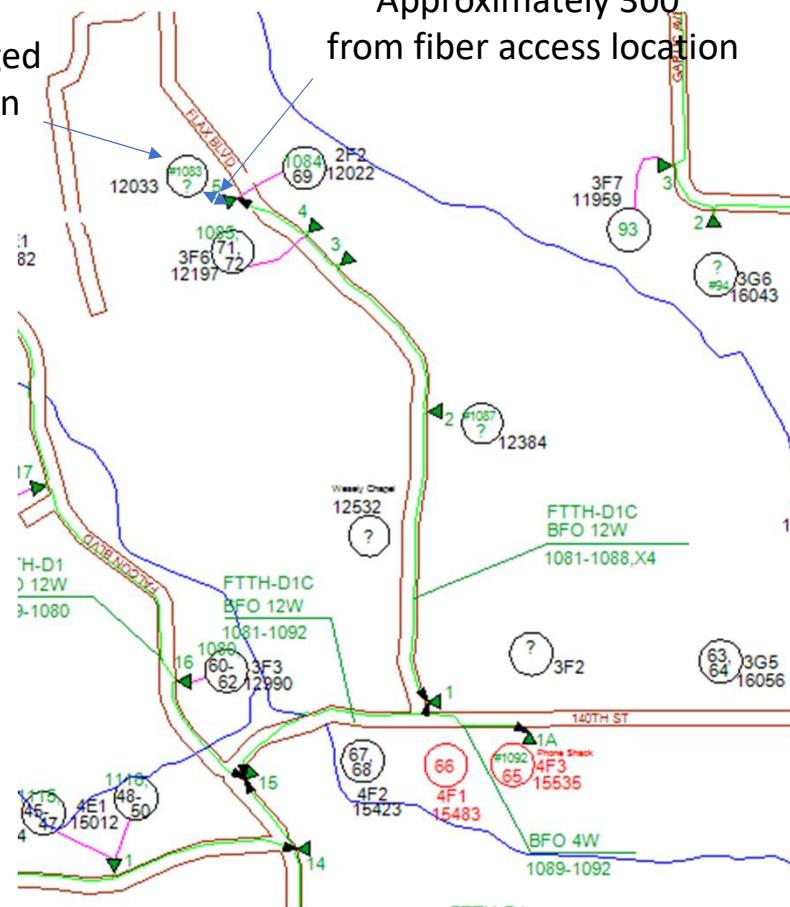
This location is within Citizen Mutual's service area. A drop cable would need to be placed to provide service and can be accomplished within 10 business days.



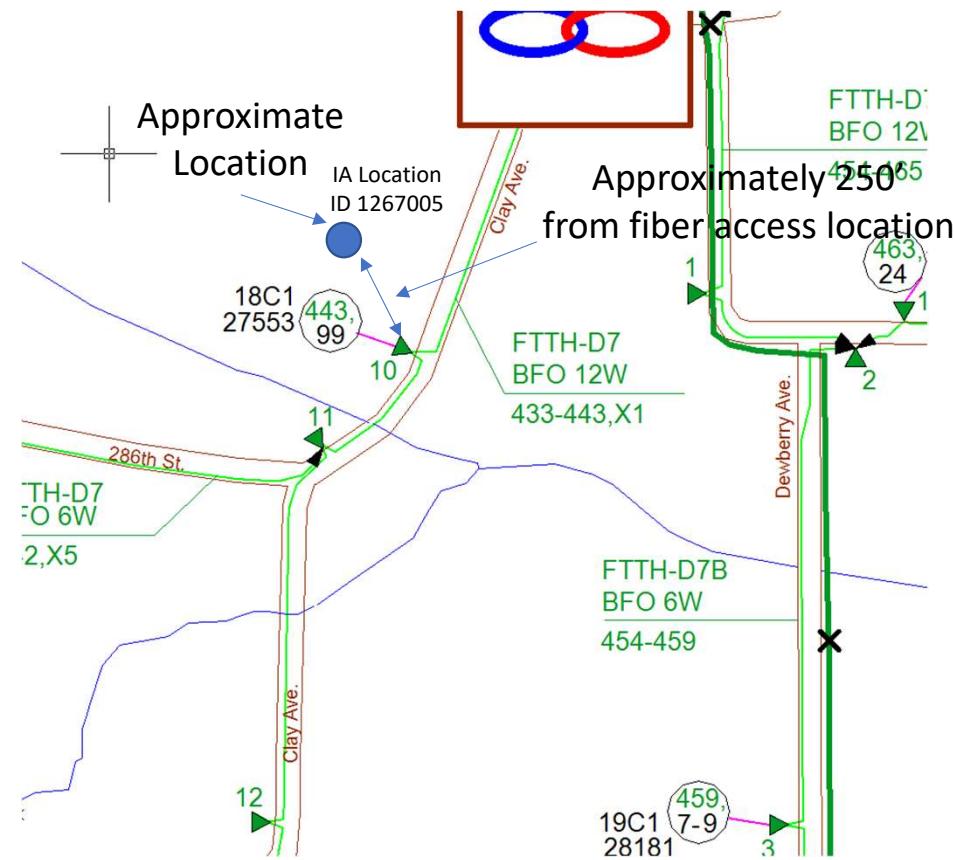
This location is within Citizen Mutual's service area. A drop cable would need to be placed to provide service and can be accomplished within 10 business days.

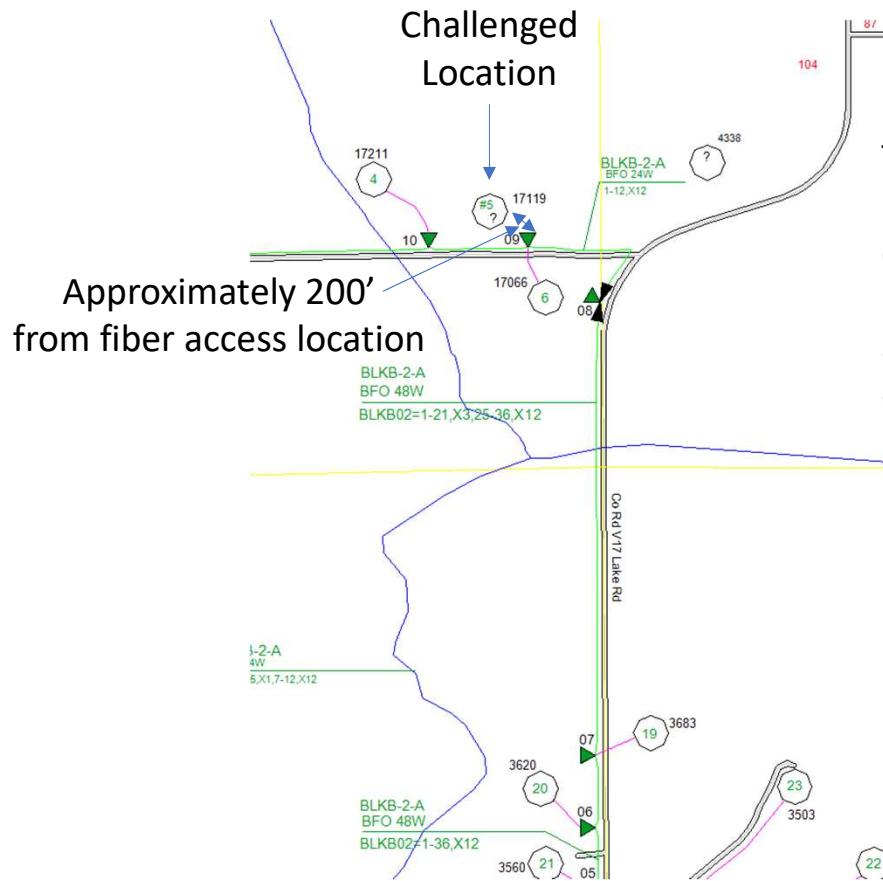
Challenged Location

Approximately 300' from fiber access location



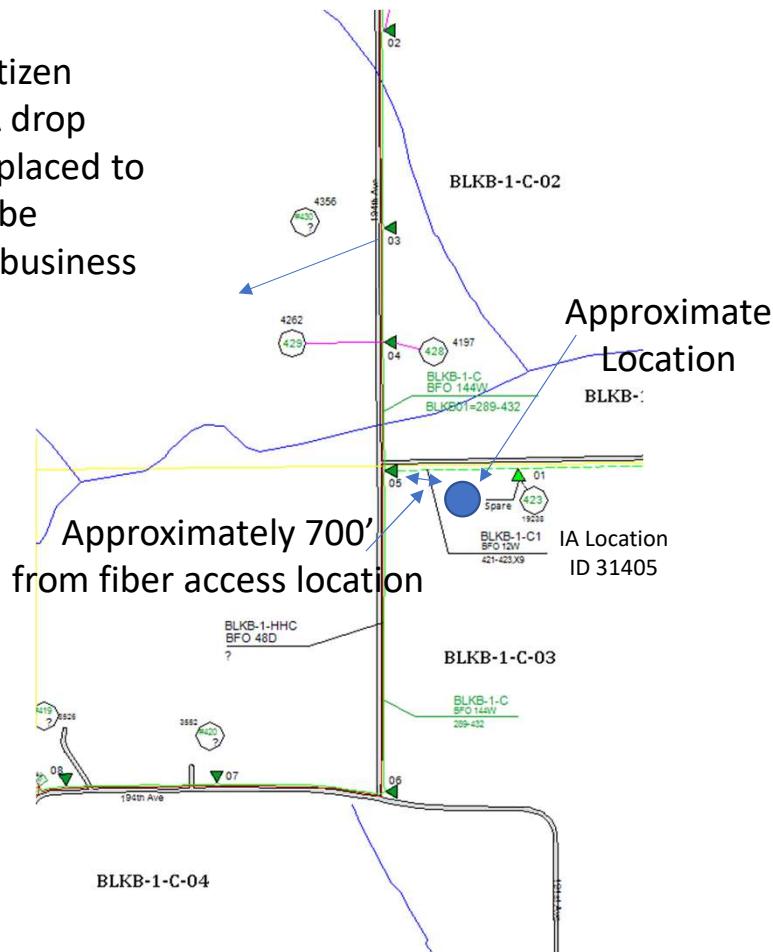
This location is within Citizen Mutual's service area. A drop cable would need to be placed to provide service and can be accomplished within 10 business days.



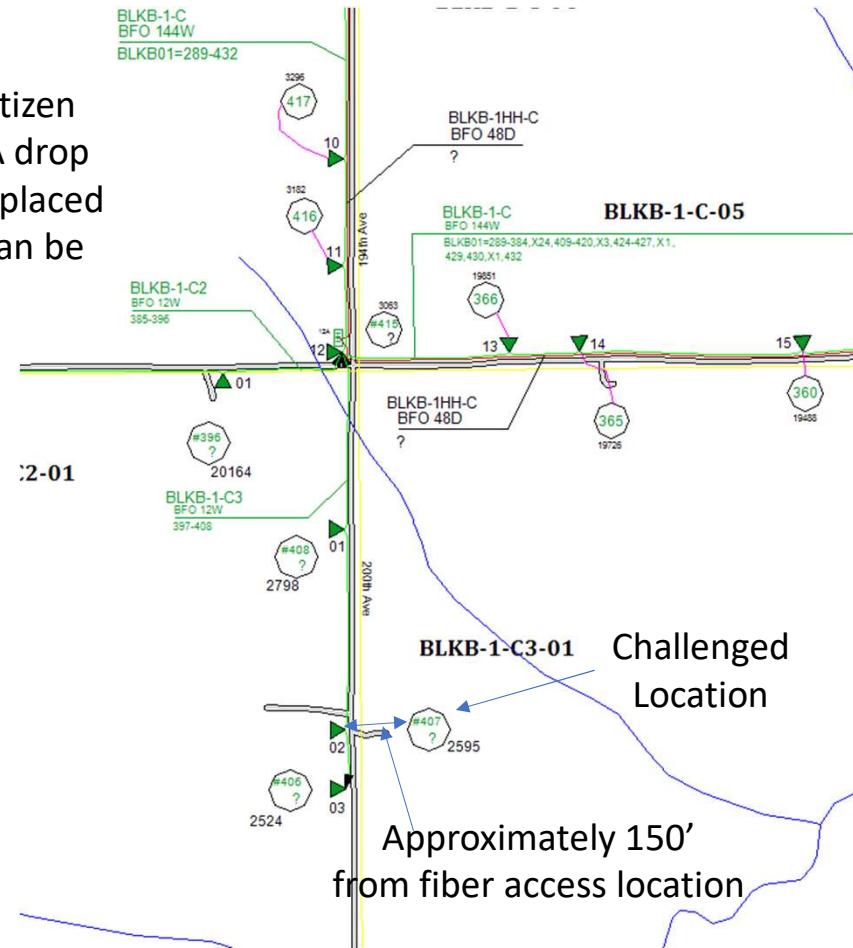


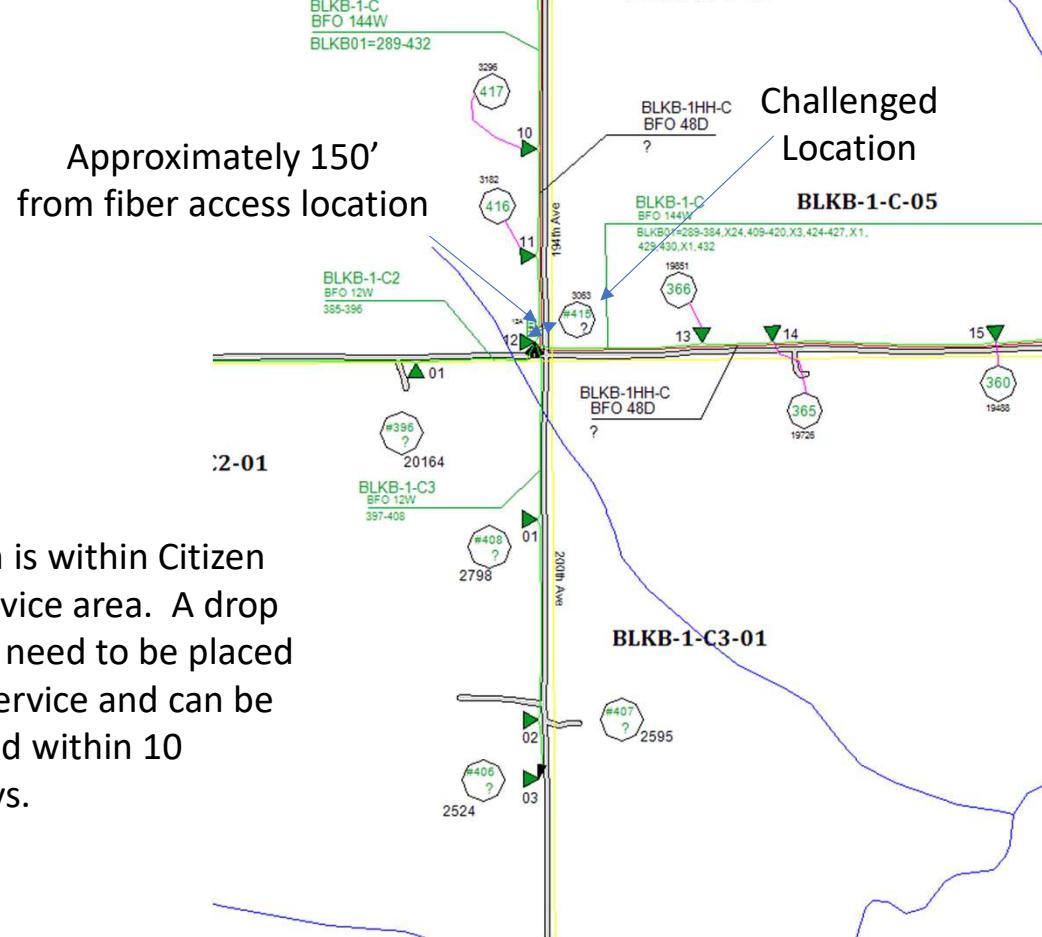
This location is within Citizen Mutual's service area. A drop cable would need to be placed to provide service and can be accomplished within 10 business days.

This location is within Citizen Mutual's service area. A drop cable would need to be placed to provide service and can be accomplished within 10 business days.

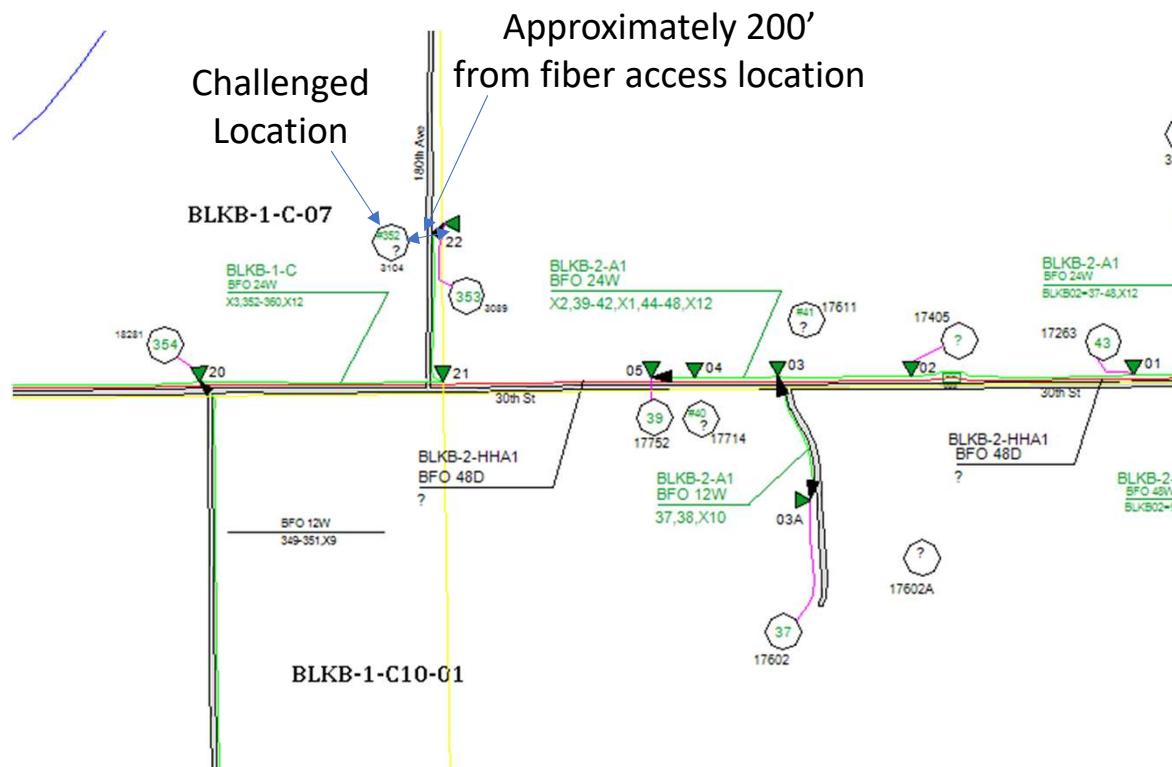


This location is within Citizen Mutual's service area. A drop cable would need to be placed to provide service and can be accomplished within 10 business days.

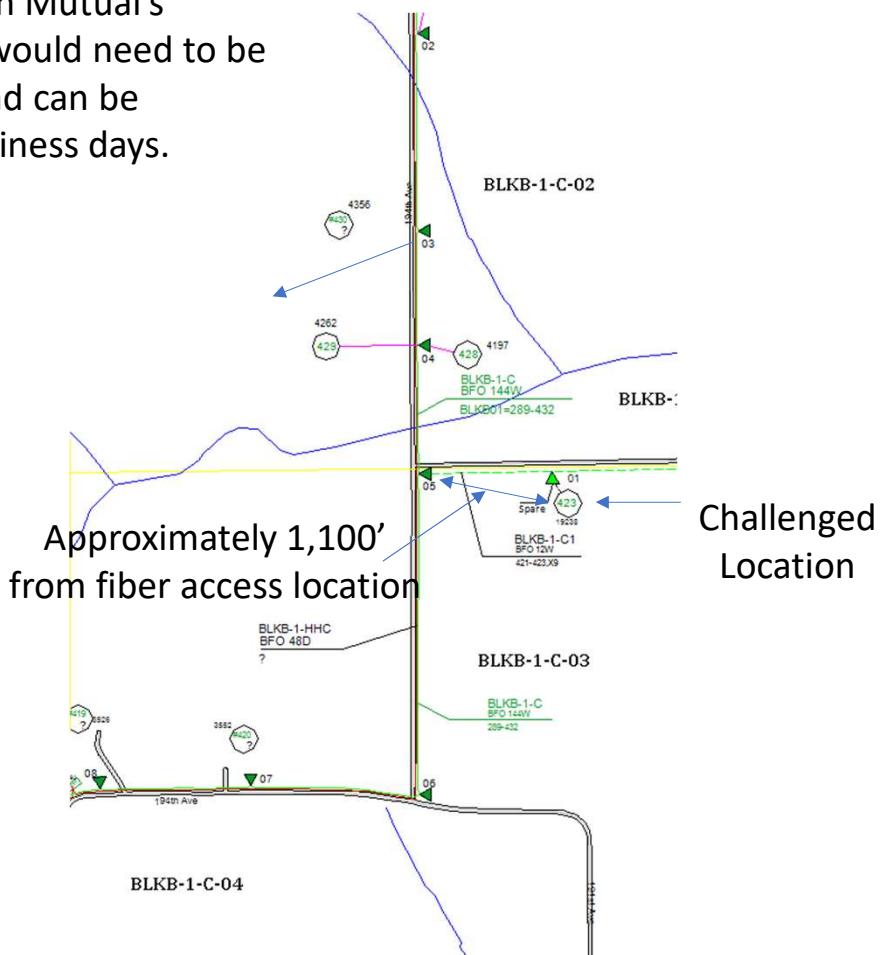




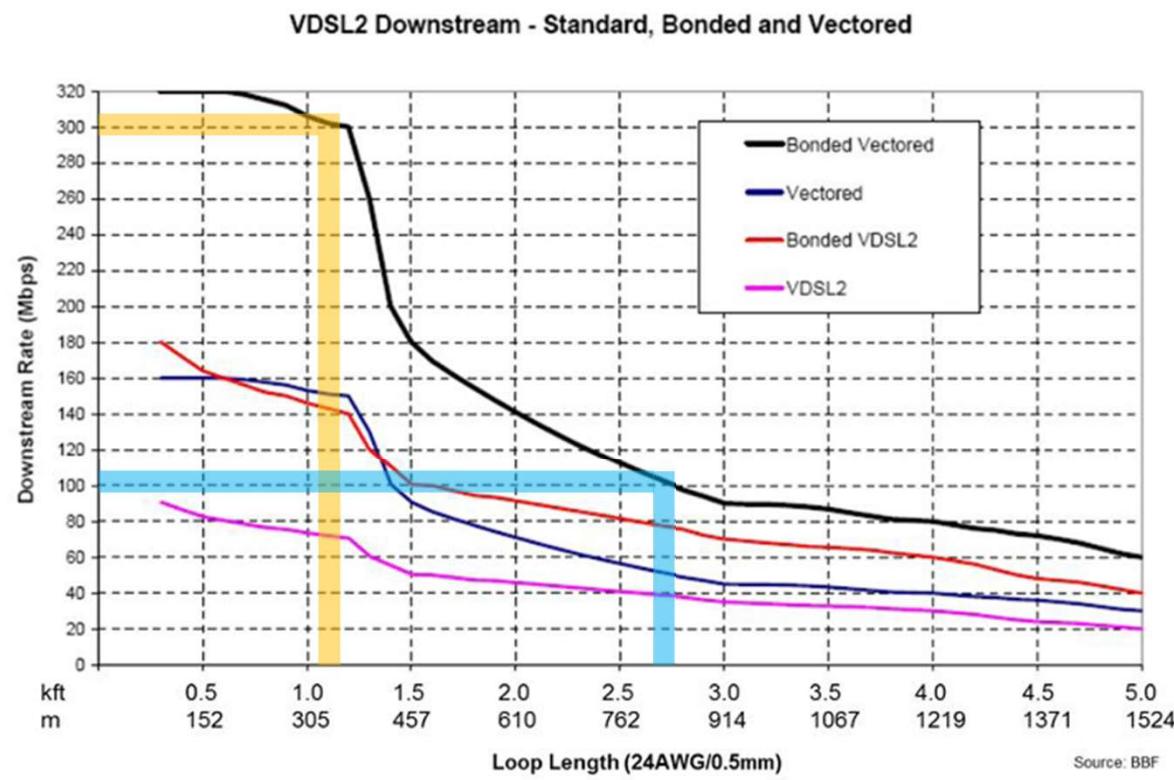
This location is within Citizen Mutual's service area. A drop cable would need to be placed to provide service and can be accomplished within 10 business days.



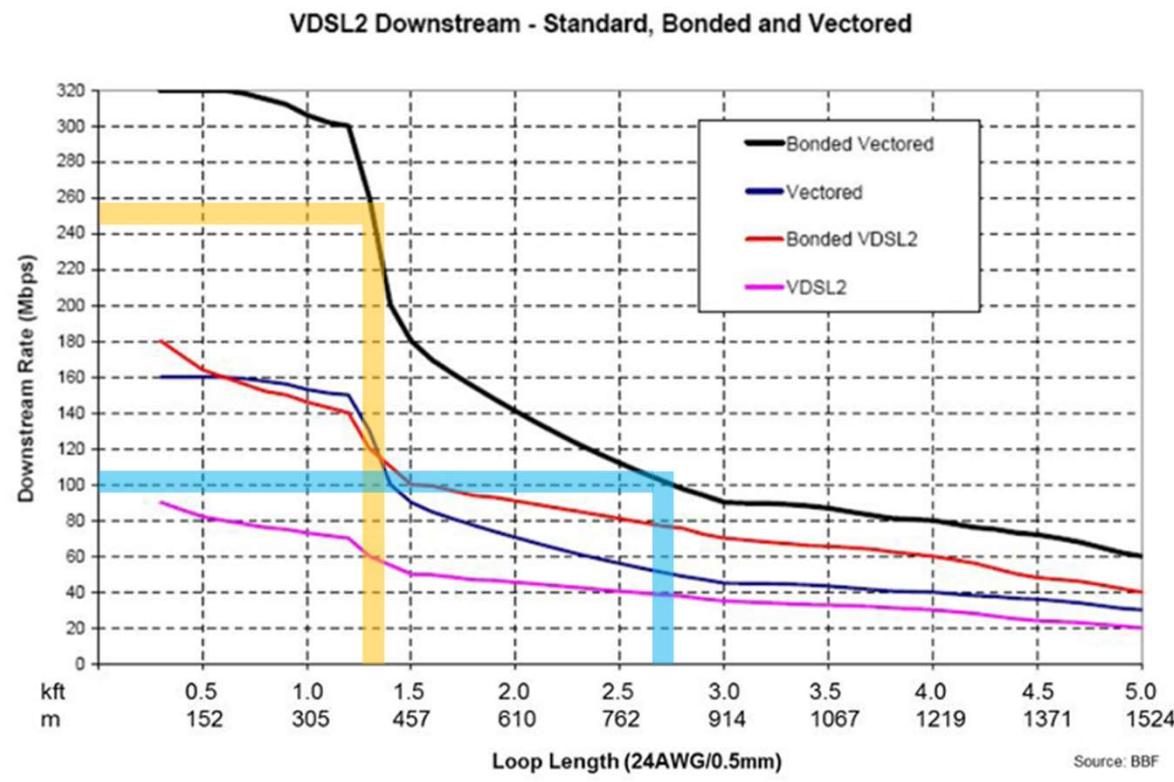
This location is within Citizen Mutual's service area. A drop cable would need to be placed to provide service and can be accomplished within 10 business days.



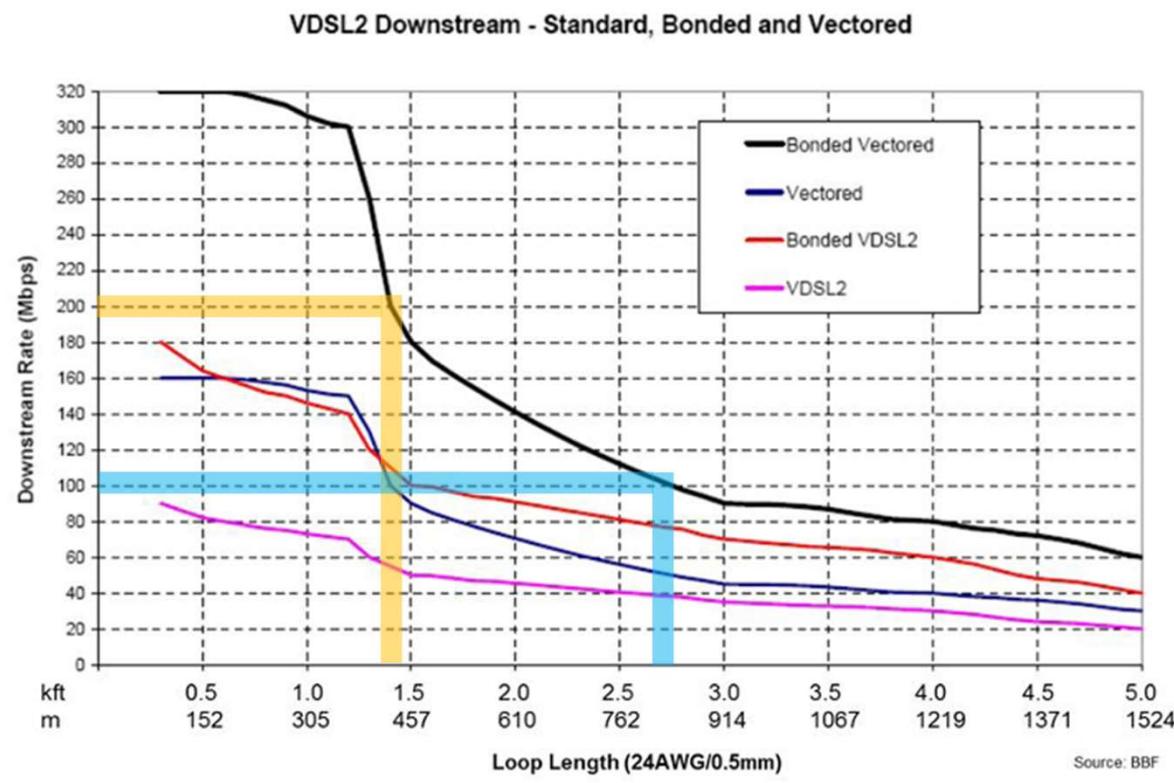
The rate/reach chart below is an independent representation of the downstream rates that can be achieved using the latest VDSL2 technology. This chart is produced by an independent organization, the Broadband Forum (BBF). As the chart indicates, without any impairments, the maximum distance that 307 mbps download can be achieved is approximately 1,100 feet (yellow highlight). The maximum distance for 100 mbps necessary to be considered likely served is approximately 2,700' (blue highlight). Citizens Mutual is not aware of fiber in this areas that would facilitate a DSL access node that would be within the physical limitations of VDSL2 to achieve these speeds.



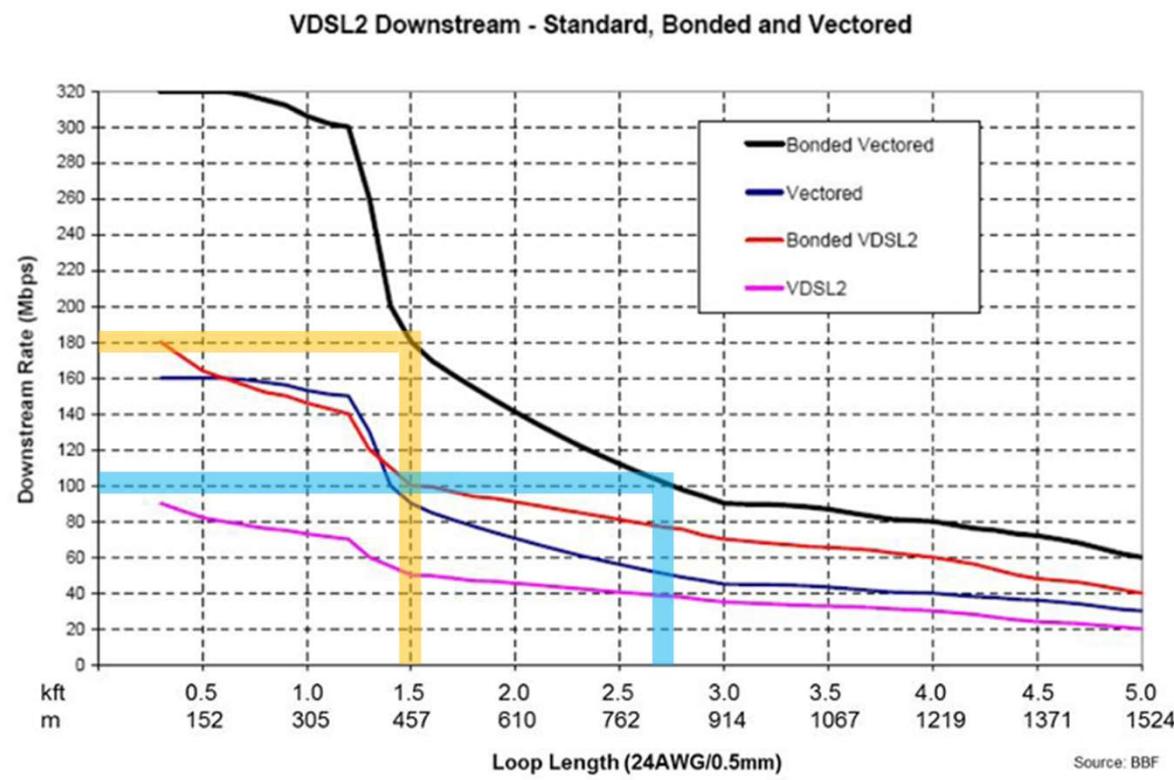
The rate/reach chart below is an independent representation of the downstream rates that can be achieved using the latest VDSL2 technology. This chart is produced by an independent organization, the Broadband Forum (BBF). As the chart indicates, without any impairments, the maximum distance that 252 mbps download can be achieved is approximately 1,300 feet (yellow highlight). The maximum distance for 100 mbps necessary to be considered likely served is approximately 2,700' (blue highlight). Citizens Mutual is not aware of fiber in this areas that would facilitate a DSL access node that would be within the physical limitations of VDSL2 to achieve these speeds.



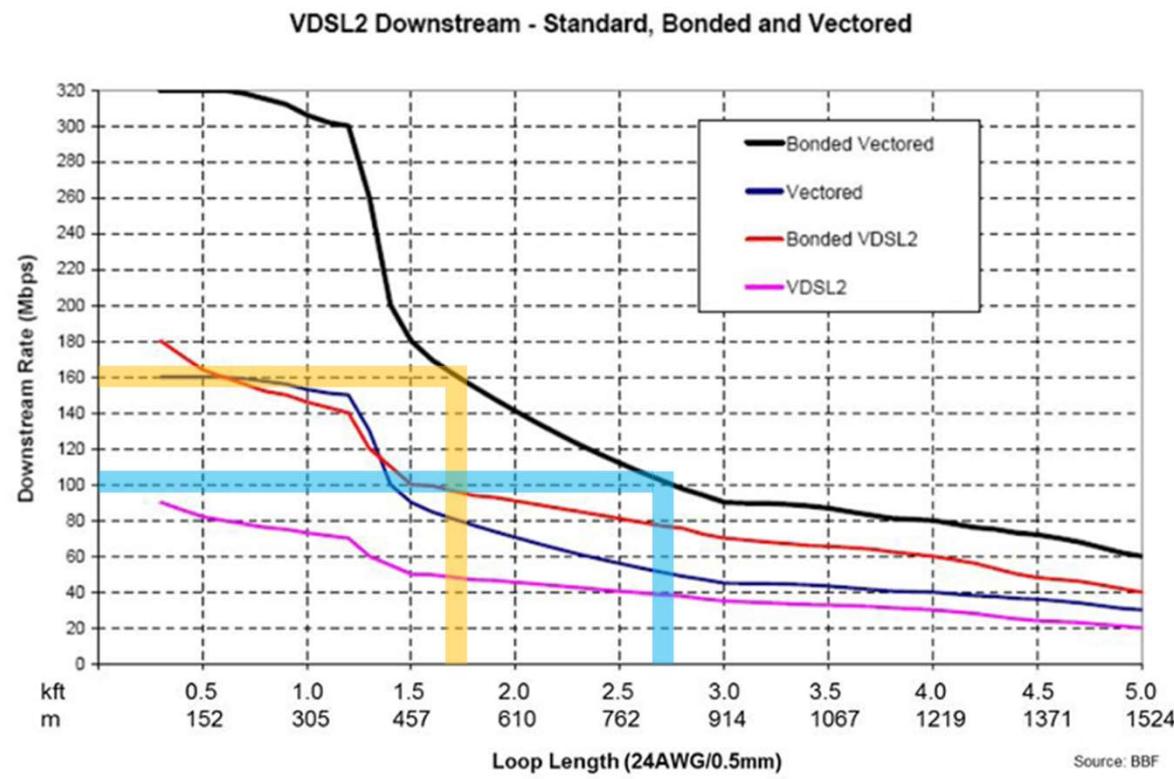
The rate/reach chart below is an independent representation of the downstream rates that can be achieved using the latest VDSL2 technology. This chart is produced by an independent organization, the Broadband Forum (BBF). As the chart indicates, without any impairments, the maximum distance that 200 - 209 mbps download can be achieved is approximately 1,400 feet (yellow highlight). The maximum distance for 100 mbps necessary to be considered likely served is approximately 2,700' (blue highlight). Citizens Mutual is not aware of fiber in this areas that would facilitate a DSL access node that would be within the physical limitations of VDSL2 to achieve these speeds.



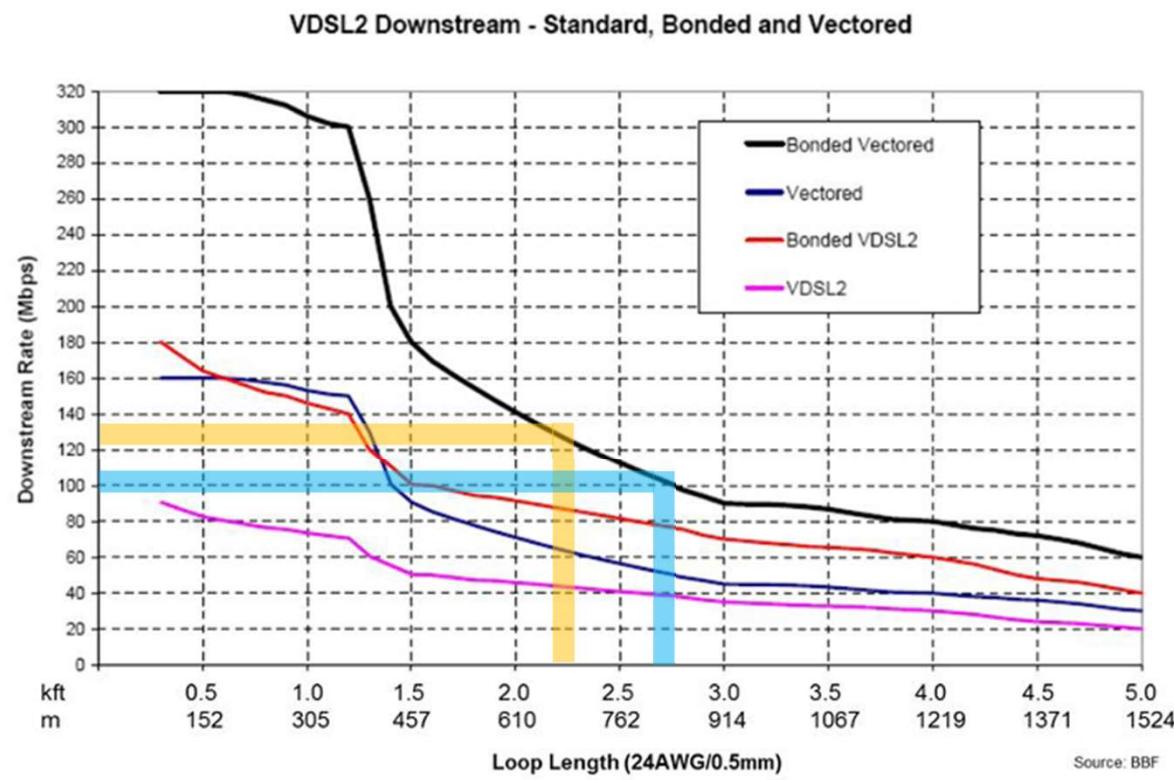
The rate/reach chart below is an independent representation of the downstream rates that can be achieved using the latest VDSL2 technology. This chart is produced by an independent organization, the Broadband Forum (BBF). As the chart indicates, without any impairments, the maximum distance that 180 - 184 mbps download can be achieved is approximately 1,500 feet (yellow highlight). The maximum distance for 100 mbps necessary to be considered likely served is approximately 2,700' (blue highlight). Citizens Mutual is not aware of fiber in this areas that would facilitate a DSL access node that would be within the physical limitations of VDSL2 to achieve these speeds.



The rate/reach chart below is an independent representation of the downstream rates that can be achieved using the latest VDSL2 technology. This chart is produced by an independent organization, the Broadband Forum (BBF). As the chart indicates, without any impairments, the maximum distance that 160 mbps download can be achieved is approximately 1,700 feet (yellow highlight). The maximum distance for 100 mbps necessary to be considered likely served is approximately 2,700' (blue highlight). Citizens Mutual is not aware of fiber in this areas that would facilitate a DSL access node that would be within the physical limitations of VDSL2 to achieve these speeds.



The rate/reach chart below is an independent representation of the downstream rates that can be achieved using the latest VDSL2 technology. This chart is produced by an independent organization, the Broadband Forum (BBF). As the chart indicates, without any impairments, the maximum distance that 123 mbps download can be achieved is approximately 2,300 feet (yellow highlight). The maximum distance for 100 mbps necessary to be considered likely served is approximately 2,700' (blue highlight). Citizens Mutual is not aware of fiber in this areas that would facilitate a DSL access node that would be within the physical limitations of VDSL2 to achieve these speeds.



The rate/reach chart below is an independent representation of the downstream rates that can be achieved using the latest VDSL2 technology. This chart is produced by an independent organization, the Broadband Forum (BBF). As the chart indicates, without any impairments, the maximum distance that 111 mbps download can be achieved is approximately 2,300 feet (yellow highlight). The maximum distance for 100 mbps necessary to be considered likely served is approximately 2,700' (blue highlight). Citizens Mutual is not aware of fiber in this areas that would facilitate a DSL access node that would be within the physical limitations of VDSL2 to achieve these speeds.

