

Broadband Census Block Designation

Notice of Appeal pursuant to 129 IAC 8.5(1)

Consistent with 129 IAC 20.5(1) and the timeframes set forth therein, this form may be used to appeal OCIO's otherwise final determination of whether a particular census block is a targeted service area. *See* Iowa Code section 8B.1(12), 8B.10. Please carefully review 129 IAC 20.5(1) prior to submitting this notice of appeal. Failure to comply with the requirements of 129 IAC 20.5(1) may result in dismissal of your appeal. Unless otherwise permitted by rule, please submit this notice of appeal and all corresponding evidence and information in support of your appeal by electronic mail (e-mail) at cio@iowa.gov.

As a government entity, OCIO is subject to the State's public records law found in Iowa Code chapter 22 and implementing administrative rules at Iowa Administrative code 129—chapter 2. In the event you are submitting evidence or information to OCIO in support of your appeal that may contain confidential information, please carefully review 129 IAC 20.5(7) (and the corresponding statutes and rules referenced therein) and complete and submit a Form 22, available here <http://ocio.iowa.gov/Form22>, along with such evidence and information. Failure to do so may result in rejection of your request for confidential treatment.

1. Who is this appeal for?

First Name

Jennifer

Middle Initial

K.

Last Name

Neff

Entity/Company on behalf of whom filing (if applicable)

Grand River Mutual Telephone Corporation dba GRM Networks

Mailing Address

1001 Kentucky Street

City

Princeton

State

MO

Zip Code

64673

Phone Number

660-748-2575

Email Address

jneff@grm.net

2. What are you appealing?

Census Block ID#(s) forming basis of appeal*	County in which census block(s) located
#190539602001180	Decatur County
#190539602001265	Decatur County
#190539602001304	Decatur County
#190539602001351	Decatur County
#190539602001321	Decatur County
#190539602001322	Decatur County
#190539602002011	Decatur County
#190539602002012	Decatur County
#190539602001341	Decatur County
#190539602001343	Decatur County
#190539602001353	Decatur County

If there are not enough fields available, please attach additional pages to this form including a list of all Census Block ID#(s) and corresponding counties you wish to appeal.

*Please to go to the [broadband map](#), locate the specific census block you would like to challenge, and insert the corresponding Census Block ID # in this field.

3. Why are you appealing?

How does OCIO's designation of this census block harm *you*, specifically? *See* 129 IAC 20.5(1)(a)(3). If the field below does not provide sufficient space for you to answer thoroughly, please attach additional pages to this form to supplement your response to this question.

Each of these fourteen (14) census blocks are not currently included in the Targeted Service Area for the property tax exemption. Each of these blocks was not capable of receiving internet speeds of 25/3 as of 7/1/2015. GRM Networks plans to build fiber to all our customers and in fact built a great deal of fiber to the home in the last year. GRM Networks would be financially harmed by not being allowed the property tax exemption for this fiber construction expense in these 14 census blocks if the TSA designation is not corrected.

4. What is the basis for your appeal?

Please state the reason(s) you believe OCIO's determination regarding the specific census block forming the basis of your appeal is incorrect. *See* 129 IAC 20.5(1)(a)(4). In stating your reasons, please cite to the specific statutes, rules, or other law upon which your appeal is based, and to any evidence or information you have submitted to the OCIO in support of your appeal. Please be as specific as possible. If the field below does not provide sufficient space for you to answer thoroughly, please attach additional pages to this form to supplement your response to this question.

Each of the 14 census blocks are designated as being able to receive 25/3 mbps speeds as of 7/1/2015 (129—20.4(8B,427) Targeted service area determination) and as such are not eligible for the property tax exemption. We have investigated and our evidence shows that none of these blocks were able to received internet speeds of 25/3 mbps as of 7/1/2015. Additional pages are attached listing each of the 14 blocks and the evidence for each. I personally called the Mediacom customer service line on 12/14/2016 five times and was told "our lines do not extend outside the city limits" and "if it's outside the city limits our lines do not go out there". Please see attached details.

2. Continued What are you appealing?

Census Block ID#(s) forming basis of appeal*	County in which census block(s) located
#190539602001359	Decatur County
#190539602001187	Decatur County
#190539601003133	Decatur County

*Please to go to the [broadband map](#), locate the specific census block you would like to challenge, and insert the corresponding Census Block ID # in this field.

4. Continued What is the basis for your appeal?

Each of the fourteen listed census blocks were not able to receive 25/3 mbps as of 7/1/2015.

1. 190539602001187

2. 190539601003133

These two blocks are listed on the map as being served by our company with 25/3 mbps speeds. GRM Networks did have service in these blocks but the speeds at that time were up to 6/1, not 25/3. The plant we had in that area as of 7/1/2015 was not capable of 25/3 speeds.

3. 190539602001180

4. 190539602001265

5. 190539602001304

6. 190539602001351

These four blocks are listed as not being a TSA, but when I select Show Related Records it says no related records found. As a result I do not know what provider the map is saying was able to provide 25/3 mbps as of 7/1/2015. The only two providers we know of in the area are Mediacom and our company. GRM Networks was not able to provide 25/3 mbps to these blocks as of 7/1/2015. I checked on the availability of Mediacom service for addresses in these blocks and my research showed that they also do not offer 25/3 in these blocks – please see attached details from the Mediacom website and from phone calls to Mediacom’s customer service. Specifically, Mediacom representatives told me:

190539602001180 – *We are not a provider in that zip code.*

190539602001265 – *Unfortunately we are not in that zip code either.*

190539602001304 - *We are on your street in that zip code. We have three addresses on that road that we service, in the 28000, 29000, and 30000 blocks. Would have to send you to customer service to determine if we can service the 25000 block (the 25000 address block is in this census block, and is quite some distance from the service in the 28000, 29000, and 30000 blocks. Per our knowledge of the area and other statements by Mediacom representatives, we believe their service does not extend this far from town). Second call on this block - Unfortunately again our lines do not extend outside the city limits. If they do happen to extend outside the city limits, it’s only a quarter mile or so.*

190539602001351 – *Unfortunately again if it’s outside the city limits our lines do not go out there. Second call on this block – Is this outside of town? We have some service as close to town as the 31370 area but not this address.*

7. 190539602001321

8. 190539602001322

9. 190539602002011

10. 190539602002012

11. 190539602001341

12. 190539602001343

13. 190539602001353

14. 190539602001359

These eight blocks are listed on the map as being served by Mediacom with 25/3 mbps speeds. I checked on the availability of Mediacom service for addresses in these blocks and my research showed they do not offer service at all in these blocks – see attached details from the Mediacom website and from phone calls to Mediacom’s customer service. Specifically, Mediacom representatives told me:

190539602001321 – *No, we do not have coverage for there.*

190539602001322 – *No, we don’t serve that street.*

190539602002011 – *Nothing on 280th Street.*

190539602002012 – *Is that outside of town? We have some in that area but not clear out at that location.*

190539602001341 – *Is that outside of town? Nothing on 290th Street.*

190539602001343 – *Nothing on 105th Avenue. Gave second address in that block – Nothing came up on that either.*

190539602001353 – *We have service on 300th street but the furthest one out that has service on that road is 14753. If you find a location that is in town or closer to town, let us know.*

190539602001359 – *We have service on that street but only in the 900 block. If outside the city limits chances are it would not be serviceable.*

12/14/2016 approximately 4 pm – checked the following addresses on the Mediacom website, then called Mediacom at 844-FULL-SPEED (844-385-5773)

First call

190539602001180

Called - what's the zip code? We are not a provider in that zip code. Didn't even get to give addresses.

13347 160th St Grand River, IA 50108

17579 150th Ave Grand River, IA 50108

Mediacom SHOP PRODUCTS ABOUT

Address

Please provide the address where you'd like to receive service.

13347 160th St

Apartment or Unit # (optional)

50108

Currently, we don't offer service at your address.

SUBMIT

Please provide the address where you'd like to receive service.

17579 150th Avenue

Apartment or Unit # (optional)

50108

Currently, we don't offer service at your address.

SUBMIT

First call, continued

190539602001265

Unfortunately we are not in that zip code either. Can transfer you to a company called Cable Mover who will tell you what providers are in that area. Did not even get to give them an address to check.

26889 175th Ave Davis City, IA 50065

26890 175th Ave Davis City, IA 50065

Please provide the address where you'd like to receive service.

Apartment or Unit # (optional)

50065

Currently, we don't offer service at your address.

SUBMIT

Please provide the address where you'd like to receive service.

Apartment or Unit # (optional)

50065

Currently, we don't offer service at your address.

SUBMIT

First call, continued

190539602001304

25658 Elk Chapel Road Lamoni, IA 50140

What's the zip code? We are a provider there. Address? We are on your street there. We have three addresses on that road that we service, in the 28000, 29000, and 30000 blocks. Would have to send you to customer service to determine if we can service the 25000 block.

Please provide the address where you'd like to receive service.

25658 Elk Chapel Road

Apartment or Unit # (optional)

50140

The zip code you entered is serviceable; however, we couldn't find your address.

SUBMIT

Second Call

190539602001304

14548 270th Street Lamoni, IA 50140

Gave zip and then address. Is that inside or outside city limits? Outside. Unfortunately our lines do not extend outside the city limits. If they do happen to extend outside the city limits, it's only a quarter mile or so.

Please provide the address where you'd like to receive service.

Apartment or Unit # (optional)

Currently, we don't offer service at your address.

SUBMIT

190539602001351

12310 324th Street Lamoni, IA 50140 – unfortunately again if it's outside the city limits our lines do not go out there

Please provide the address where you'd like to receive service.

Apartment or Unit # (optional)

Our apologies, but we still can't find your address. Because we do service your zip code, it's possible you can get Mediacom services. Please call today to see if Mediacom services are available to you: 844-FULL-SPEED (844-385-5773).

SUBMIT

190539602001353

13401 300th Street Lamoni, IA 50140 – We have service on 300th street but the furthest one out that has service on that road is 14753. If you find a location that is in town or closer to town, let us know.

Please provide the address where you'd like to receive service.

Apartment or Unit # (optional)

Our apologies, but we still can't find your address. Because we do service your zip code, it's possible you can get Mediacom services. Please call today to see if Mediacom services are available to you: 844-FULL-SPEED (844-385-5773).

SUBMIT

Third Call

190539602001351

31953 US Hwy 69 Lamoni, IA 50140 – what’s the address and zip code – would have to do service check

Fourth Call – Is this outside of town – we have some service as close to town as the 31370 area but not that address.

Please provide the address where you'd like to receive service.

31953 US Hwy 69

Apartment or Unit # (optional)

50140

Our apologies, but we still can't find your address. Because we do service your zip code, it's possible you can get Mediacom services. Please call today to see if Mediacom services are available to you: 844-FULL-SPEED (844-385-5773).

SUBMIT

190539602001321

13893 270th Street Lamoni, IA 50140 – no – we do not have coverage for there.

Please provide the address where you'd like to receive service.

13893 270th St

Apartment or Unit # (optional)

50140

Our apologies, but we still can't find your address. Because we do service your zip code, it's possible you can get Mediacom services. Please call today to see if Mediacom services are available to you: 844-FULL-SPEED (844-385-5773).

SUBMIT

Third Call, continued

19053602001322

14704 280th Street Lamoni, IA 50140 – no we don't serve that street

Please provide the address where you'd like to receive service.

Apartment or Unit # (optional)

50140

Our apologies, but we still can't find your address. Because we do service your zip code, it's possible you can get Mediacom services. Please call today to see if Mediacom services are available to you: 844-FULL-SPEED (844-385-5773).

SUBMIT

190539602002011

14931 280th Street Lamoni, IA 50140 – nothing on 280th street

Please provide the address where you'd like to receive service.

Apartment or Unit # (optional)

50140

Our apologies, but we still can't find your address. Because we do service your zip code, it's possible you can get Mediacom services. Please call today to see if Mediacom services are available to you: 844-FULL-SPEED (844-385-5773).

SUBMIT

Fourth Call

19053960200212

28441 N. State Street Lamoni, IA 50140 – Is that outside of town? We have some in the area but not clear out at that location. Would have to send someone out to check.

Please provide the address where you'd like to receive service.

28441 N. State Street

Apartment or Unit # (optional)

50140

Our apologies, but we still can't find your address. Because we do service your zip code, it's possible you can get Mediacom services. Please call today to see if Mediacom services are available to you: 844-FULL-SPEED (844-385-5773).

SUBMIT

19053602001341

12301 290th Street Lamoni, IA 50140 – Is that outside of town? Nothing on 290th Street.

Please provide the address where you'd like to receive service.

12301 290th Street

Apartment or Unit # (optional)

50140

Our apologies, but we still can't find your address. Because we do service your zip code, it's possible you can get Mediacom services. Please call today to see if Mediacom services are available to you: 844-FULL-SPEED (844-385-5773).

SUBMIT

Fourth Call, continued

190539602001343

32295 105th Ave Lamoni, IA 50140 - nothing on 105th avenue

12274 315th St Lamoni, IA 50140 – nothing came up on that either

Please provide the address where you'd like to receive service.

32295 105th Avenue

Apartment # (or Unit #) (optional)

50140

Our apologies, but we still can't find your address. Because we do service your zip code, it's possible you can get Mediacom services. Please call today to see if Mediacom services are available to you: 844-FULL-SPEED (844-385-5773).

SUBMIT

Please provide the address where you'd like to receive service.

12274 315th Street

Apartment # (or Unit #) (optional)

50140

Our apologies, but we still can't find your address. Because we do service your zip code, it's possible you can get Mediacom services. Please call today to see if Mediacom services are available to you: 844-FULL-SPEED (844-385-5773).

SUBMIT

Fifth call

190539602001359

31131 S. Smith Street Lamoni, IA 50140 – we have service on that street but only in the 900 block. If outside the city limits chances are it would not be serviceable.

Please provide the address where you'd like to receive service.

Apartment or Unit # (optional)

Our apologies, but we still can't find your address. Because we do service your zip code, it's possible you can get Mediacom services. Please call today to see if Mediacom services are available to you: 844-FULL-SPEED (844-385-5773).

Form 22—Request for Confidentiality

Per Iowa Administrative Code rule 129—20.5(7), persons submitting evidence or information to the Office of the Chief Information Officer of the State of Iowa (OCIO) as part of the appeals and contested case process outlined in 129 Iowa Administrative Code chapter 20 must complete this Form 22 and submit it with such submission(s). Persons are encouraged to familiarize themselves with Iowa Code chapter 22 and 129 Iowa Administrative Code chapters 2 and 20 before submitting evidence or information to OCIO as part of the appeals and contested case process outlined in 129 Iowa Administrative Code chapter 20. Iowa Administrative Code rule 129—20.5(7) provides instructions regarding how to request confidential treatment of select portions of submissions of evidence or information to OCIO.

NOTE: Completion of this Form 22 is the sole means of requesting confidential treatment. Completion of this Form 22 and OCIO's acceptance of a person's submission(s) does not guarantee OCIO will grant person's request(s) for confidentiality. In the event a person requests confidentiality and does not submit a fully completed Form 22 or fails to otherwise comply with Iowa Administrative Code rule 129—20.5(7), OCIO may reject said person's request(s) for confidentiality.

To request confidentiality, a person must provide the following information:

- 1 Person must identify its request(s) for confidentiality in the notice of appeal if evidence or information is submitted pursuant to Iowa Administrative Code rules 129—20.5(1) & (2); or, if evidence or information is submitted pursuant to Iowa Administrative Code rule 20—8.5(3), person must identify its request for confidentiality by checking the appropriate box online or by identifying its request for confidentiality in the written explanation of why electronic filing was not feasible. **Check box when completed.** *N/A - none*
- 2 Person must conspicuously mark the outside of any submission as containing confidential information and mark each page therein upon which confidential information appears in accordance with Iowa Administrative Code rules 129—20.5(7)(a)(3) & (4). **Check box when completed.** *N/A - none*
- 3 Person must specifically identify and list the submission(s) and corresponding page numbers for which it seeks confidential treatment and answer the following questions for each page-range listed:
 - 3.1 Enumerate the specific grounds in Iowa Code Chapter 22 or other applicable law that support treatment of the specific evidence or information as confidential. Iowa Admin. Code r. 8.5(7)(b)(1).
 - 3.2 Justify why the specific evidence or information should be kept in confidence. *Id. (2)*.
 - 3.3 Explain why disclosure of the specific evidence or information would not be in the best interest of the public. *Id. (3)*.
 - 3.4 Set forth the name, address, telephone, and email address of the individual authorized by the person or party submitting such evidence or information to respond to inquiries from OCIO concerning the confidential status of such evidence or information. *Id. (4)*.

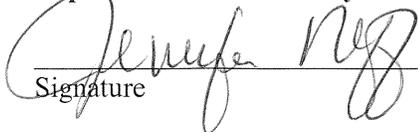
Please provide the information in the table below. Persons may add additional lines if necessary or add additional pages using the same format as the table below.

Specific submission and corresponding page range for which questions are being answered	Cite to specific grounds in Iowa Code Chapter 22 or other applicable law that support treatment of the evidence or information as confidential	Justification why evidence or information should be kept in confidence	Explanation why disclosure of evidence or information would not be in the best interest of the public	The name, address, telephone, and email address of the individual authorized by the person or party submitting such evidence or information to respond to inquiries concerning the confidential status of such evidence or information
No confidentiality request for this appeal				Jennifer Neff GRM Networks 1001 Kentucky Street Princeton, MO 64673 660-748-2575 jneff@grm.net

- 4 Person must submit a public copy of the submission(s) from which the confidential information has been excised. Iowa Admin. Code r. 8.5(7)(a)(5). The confidential material must be excised in such a way as to allow the public to determine the general nature of the evidence or information removed and to retain as much of the otherwise public information as possible. **Check box when completed.** *N/A - none*

This Form 22 must be signed by the individual who filed the notice of appeal pursuant to Iowa Administrative Code rules 129—8.5(1) & (2) or who submitted evidence or information pursuant to Iowa Administrative Code rule 129—8.5(3). Persons shall submit this Form 22 completed and signed along with any submission of evidence or information to OCIO as part of the appeals process and contested case process outlined in 129 Iowa Administrative Code chapter 8. A copy of this document shall also be included in all submissions, including the public copy.

***Failure to provide the information required in this Form 22 may result in rejection of person's request for confidentiality.**


Signature

12/15/2016
Date

Director of Human Resources and Regulatory Affairs
Title