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January 25, 2017

Office of the Chief Information Officer
Hoover State Office Building, Level B
1305 E. Walnut Street
Des Moines, IA 50319

RE: HTC Communications Notice of Appeal

To Whom It May Concern:

Northern Iowa Telephone Company d/b/a Premier Communications ("Premier") is submitting this letter and accompanying documents as an interested party to the notice of appeal submitted by HTC Communications ("HTC") in reference to certain census blocks included in that appeal but currently listed as eligible on the OCIO's Broadband Availability Map.

Today Premier received its property tax exemption certification from the OCIO for its 2016 projects in targeted service areas ("TSA") and noticed that 16 census blocks were flagged as currently under appeal. It is Premier's understanding that even though these census blocks are currently under appeal, the certification received from the OCIO certifies all census blocks in our application, including those under appeal; however, out of an abundance of caution, Premier submits this letter to provide clarification surrounding the census blocks being appealed by HTC.

In Premier's review of the census blocks being appealed, it noticed that all of the census blocks are "split" census blocks. Premier uses the term "split" to denote that Premier's exchange boundaries in those census blocks do not perfectly match the census block boundaries, but in fact "split" the census block. In other words, HTC likely does provide broadband service in the census block, but ONLY within its Sheldon exchange; whereas, Premier is the ONLY broadband provider within its Matlock and Sanborn exchange boundary providing service to the remaining portion of the "split" census blocks.

Premier has included two supporting documents along with this letter:

- Exchange Boundary Map – The first document is a screen shot of a Google Earth map including the GPS exchange boundaries for Premier's Matlock and Sanborn exchanges (lines in red). It also shows the census blocks within those two



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exchanges and visually explains how some of the census blocks are both within and outside of Premier's exchange boundaries (i.e. "split" census blocks).

- **Appealed Census Blocks** – The Excel spreadsheet simply includes the census blocks being appealed by HTC and included in Premier's 2016 TSA and the OCIO's property tax exemption certification with the explanation of "split block" and the corresponding Premier exchange.

Thank you for taking the time to review this letter and corresponding documents. Please do not hesitate to contact me with any follow-up questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Boone", with a long horizontal flourish extending to the right.

Ryan Boone
COO

Premier Communications

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