

nief Information Officer

Broadband Map V5 Final Agency Decision

	DOCKET NO. 007P
	A. CHALLENGER INFORMATION
Entity/Community Name	Panora Communications Cooperative
FRN (Provider Only)	0003723756
Address	114 E Main St
City	Panora
State	IA IA
Zip	50216
	B. DESIGNATED CONTACT INFORMATION
Contact Name	Andrew Randol
Contact Phone Number	641-755-2424
Contact Email	andrewrandol@panoratelco.com
	C. CHALLENGE TYPE
	Resident
	Community
✓	Provider - Self-reporting
	Provider - Third-party
-	State
ightharpoons	Location Not on Map
	D. EVIDENCE CONSIDERED
Challenger related thereto (see	ations forming the basis of this Challenge, the Office has reviewed the evidence and information submitted by Appendix C for original submission), in conjunction with the maps and data sources originally utilized in nat extent service was available to a particular address location.
✓	Challenger submitted an Attestation as part of its Challenge, affirming under penalty of perjury whether and to what extent Broadband service was offered as of August 2, 2022.
✓	Challenger submitted additional information in support of its Challenge. This information has been considered by the Office in making its Final Decision.
✓	Challenged address locations within this Challenge overlap with other Challenge(s) containing one or more of the same address locations. The Office considered evidence submitted in connection with any overlapping Challenge in making its final decision for any overlapping address location.
	The Office sent a Notice to impacted Provider(s) at the challenged address location concerning

Go to https://ocio.iowa.gov/broadband-availability-map-version-5-challenge-process for more information regarding how the Office evaluates evidence and makes determinations regarding information reflected on the map.

E. APPEAL

The Office will post its Final Decisions on its website at ocio.iowa.gov/broadband. If a Challenger wishes to appeal the Decision, the Challenger must notify the Office in writing within thirty (30) days of the posting of the Decision. A request for a contested case must be filed by mailing a written request to:

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

 \checkmark

In so doing, the reason for 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.

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. 129–6.6. 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.

SIGNED

DATE

12/20/2022

Matt Behrens
Chief Information Officer

of these efforts.

State of Iowa Date of Issuance: December 20, 2022

whether and to what extent reported broadband service was offered as of August 2, 2022. The Office

may have received a Response and/or other evidence from impacted Provider(s) in response to such Notices, or in response to the general Notice posted on the website. Refer to Appendix D for a record

	Definitions
Challenged Provider	A provider that has been named in a challenge; the challenge is specific to that provider.
Notice Form	A notice was sent in the form of an Excel workbook to all providers at a challenged address location regardless of whether the challenge named the provider specifically. Multiple Notice Forms may have been sent regarding Map V5.
Unchallenged Provider	A provider that reflects on the Map as serving an address location that is being challenged but the challenge is not specific to that provider.

Basis Number	Decision	Explanation	For Use When:	Result
1	Accepted	The Office accepts the information submitted by the Challenger for this address location because the Office does not possess conflicting information.	(1) A provider confirms they do not serve that address location; (2) The challenged provider did not respond to the Notice Form.	Change to the map
2	Declined	The Office declines the information submitted by the Challenger due to one of the following reasons: (1) the evidence provided by the Challenger is not sufficiently probative; (2) the evidence or explanation given by provider(s) at that location was sufficient to overcome challenger's claim; (3) Challenger's claim was not against this provider, and provider responded to Notice; (4) Location ID is outside of NOFA project area.	(1)The Unchallenged Provider responded to the Notice Form; (2) The address location falls outside the area identified in the evidence; (3) The Challenged Provider responded to the Notice Form with sufficient evidence to rebut the claim.	No change to the map
3	Accepted	The Office accepts the information submitted by the Challenger for this address location despite information having been submitted by impacted provider(s). The Office finds the evidence submitted by the Challenger to be more probative than the information submitted by impacted provider(s).	(1) The Challenged Provider responded without evidence or without sufficient evidence to rebut the claim.	Change to the map
4	Declined	The Office declines the information submitted by the Challenger because there was an insufficient basis for challenge.	(1) No providers reflect at this address location; (2) A provider was noticed for their own submitted challenge and did not respond; (3) Provider claims previous incentive already reflected on the map; (4) Resident claims they are happy with their service and not reporting problems with their provider; (5) Challenged provider is not reflected on the Map for that address location; (6) Map already reflects the stated claim for challenge.	No change to the map

FINAL DECISION 007P Panora Communications.xlsx

Appendix A Final Decision

								Fastest	Fastest		
								download	upload speed		
IA					No. of			speed in Mbps			
Location				ZIP	Units at			for this type of		Technology	Is this location served, underserved, or
ID	Street Address	City	State	Code	address	Basis for Challenge	Challenge Detail	service	service	Type	unserved?
							Provider only: The Map does not correctly reflect				
9157	1921 POPLAR AVENUE	GUTHRIE CENTER	IA	50115	1	11-Provider not reflected on the map	service that I facilitate to this location	1000	250	Fiber	
							Provider only: The Map does not correctly reflect				
223962	6069 NESTER POINT	PANORA	IA	50216	1	11-Provider not reflected on the map	service that I facilitate to this location	1000	250	Fiber	
472104	COCE NIECTED DOINIT	DANODA		F0216	1	11 Drawides not reflected on the man	Provider only: The Map does not correctly reflect	1000	350	Tib au	
4/2104	6065 NESTER POINT	PANORA	IA	50216	1	11-Provider not reflected on the map	service that I facilitate to this location Provider only: The Map does not correctly reflect	1000	250	Fiber	
497867	6022 MASON DRIVE	PANORA	IA	50216	1	11-Provider not reflected on the map	service that I facilitate to this location	1000	250	Fiber	
177007	OOZZ 1 1/1/SOTY BILLYE	17410101	,,,	30210		11 Frovider Hot reflected on the map	Provider only: The Map does not correctly reflect	1000	230	1 1001	
602525	6061 NESTER POINT	PANORA	IA	50216	1	11-Provider not reflected on the map	service that I facilitate to this location	1000	250	Fiber	
						·	Provider only: The Map does not correctly reflect				
723199	2393 190TH STREET	GUTHRIE CENTER	IA	50115	1	11-Provider not reflected on the map	service that I facilitate to this location	1000	300	Fiber	
							Provider only: The Map does not correctly reflect				
806761	6808 PANORAMA DRIVE	PANORA	IA	50216	1	11-Provider not reflected on the map	service that I facilitate to this location	1000	300	Fiber	
000707	2024 044 4751115	CUTUDIE CENTED		F011F	_	11 Describes and reflected and the man	Provider only: The Map does not correctly reflect	1000	700	Eth	
889/8/	2021 OAK AVENUE 2607 IOWA STATE	GUTHRIE CENTER	IA	50115	1	11-Provider not reflected on the map	service that I facilitate to this location	1000	300	Fiber	
962555	HIGHWAY 44	GUTHRIE CENTER	IΔ	50115	1	11-Provider not reflected on the map	Provider only: The Map does not correctly reflect service that I facilitate to this location	1000	300	Fiber	
702333	I II GII WAI TT	GOTTIKIE CENTER	I/A	30113		11 Frovider not reflected on the map	Provider only: The Map does not correctly reflect	1000	300	i ibci	
1061251	6015 GUTHRIE LANE	PANORA	IA	50216	1	11-Provider not reflected on the map	service that I facilitate to this location	1000	300	Fiber	
						·	Provider only: The Map does not correctly reflect				
1333069	1964 MAPLE AVENUE	GUTHRIE CENTER	IA	50115	1	11-Provider not reflected on the map	service that I facilitate to this location	1000	300	Fiber	
						12-Provider facilitates speeds faster than that	Provider only: The Map does not correctly reflect				
208992	1974 NORTH LANE	GUTHRIE CENTER	IA	50115	1	reported on the map	service that I facilitate to this location	1000	300	Fiber	
1010074	100 3-4 4	Davis		F0030	,	7-User perception of slow service (e.g., in-home	Provider or Community: I am challenging a				Hadanaarad (25/7 Aassailahla aaniaa 4400/20)
1018034	100 2nd Ave	Bayard	IA	50029	1	speed test, sworn statement required)	broadband provider				Underserved (25/3 < available service < 100/20)

FINAL DECISION 007P Panora Communications.xlsx

Appendix A Final Decision

						When the service of another provice this Office will take affirmative ste to impacted provide	ps to send notice	Final Agency Decision				
IA Location ID	Technology Type	Sworn Statement/ Survey Response	Broadband study expressly citing location	Speed test at this location	Other	Notice sent?	Response received?	Accepted/ Declined	Decision Basis	Overlapping Challenge Docket, if applicable		
9157					kmz of fiber infrastructure	Not Applicable	Not Applicable	Accepted	1			
223962					kmz of fiber infrastructure	Not Applicable	Not Applicable	Accepted	1			
472104					kmz of fiber infrastructure	Not Applicable	Not Applicable	Accepted	1			
497867					kmz of fiber infrastructure	Not Applicable	Not Applicable	Accepted	1			
602525					kmz of fiber infrastructure	Not Applicable	Not Applicable	Accepted	1			
723199					kmz of fiber infrastructure	Not Applicable	Not Applicable	Accepted	1			
806761					kmz of fiber infrastructure	Not Applicable	Not Applicable	Accepted	1			
889787					kmz of fiber infrastructure	Not Applicable	Not Applicable	Accepted	1			
962555					kmz of fiber infrastructure	Not Applicable	Not Applicable	Accepted	1			
1061251					kmz of fiber infrastructure	Not Applicable	Not Applicable	Accepted	1			
1333069					kmz of fiber infrastructure	Not Applicable	Not Applicable	Accepted	1			
208992					kmz of fiber infrastructure	Not Applicable	Not Applicable	Accepted	1			
1018034	Wired			Page 1,2		Yes	Yes	See Appendix A.1		0485		

							Response	Final Agency		Overlapping
Docket	Address ID	Address	City	City State		Provider	Received	Decision	Decision Basis	Challenge
007P			Bayard			Panora Telecommunications, Inc	No	Declined	4	Chatterige
007P		100 2nd Ave	Bayard	IA	50029	Windstream	Yes	Accepted		0485
0071	101003+	100 ZHa AVC	Dayaru	I/A	30027		103	Accepted	,	0103
_										

FINAL DECISION 007P Panora Communications.xlsx

Appendix B Location Not Present

																Final Agen	
IA Location ID (if existing)	Street Address	City	State	Zip	Building Type	No. of Units at address	Basis	Fastest download speed in Mbps for this type of service	for this type of	Technology Type	Sworn Statement/ Survey Response	Broadband study expressly citing location	Speed test at this location	Other	Address location on Map	Accepted/ Declined	Overlapping Challenge Docket, if applicable
							1-Missing Broadband							While this address is missing from the map, prior maps showed overstated Service Reported by Windstream. Speed test evidence shows level of			
	117 Main Street	Bagley	IA	50026	Business	1	Serviceable Location	10	1	DSL			Page 4,5	service receiving from Windstream.	Update		
		İ	<u> </u>												L		

APPENDIX C Original Challenge Submission



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 for 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 lowa Administrative Code chapter 129-6.	



Title:

Date:

Broadband Map V5 Provider/Community Challenge Form

	A. CHALLENGER INFORMATION		
Entity/Community Name	Panora Communications Cooperative		
FRN (Provider Only)	0003-7237-56		
Address	114 E Main St		
City	Panora		
State	IA IA		
Zip	50216		
	B. DESIGNATED CONTACT INFORMATION		
Contact Name	Andrew Randol		
Contact Phone Number	641-755-2424		
Contact Email	andrewrandol@panoratelco.com		
	C. EXPLANATION		
To the extent you believe addit please provide narrative to fur	cional explanation is required to ensure that you are communicating full and accurate information,		
produce provide narrative to rai	ther explain your challenge.		
Panora Telephone Cooperative (Par serving all locations listed. All of the network infrastructure in support of t	nora) is challenging the addresses included on the challenge form. Panora currently has fiber network infrastructure capable of e challenged locations currently receive greater than 100M/100M service from Panora. Panora has included a kmz of their fiber his challenge. These locations included within the challenge were not included in the prior reportings due to either being recently wribe to service from Panora. However, as evidenced by Panora's kmz, they are capable of serving these with existing fiber network infrastructure.		

CEO/General Manager

8/17/2022

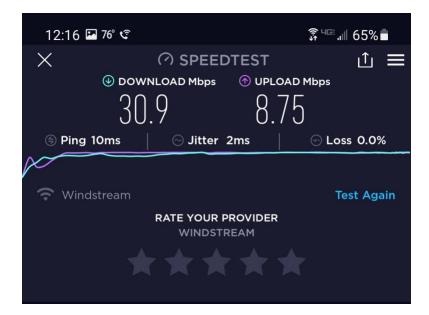
IA Locatio	Street Address	City	Stat		No. of Units at address (house,	Basis for	Challenge	Fastest download speed in Mbps for	Fastest upload speed in Mbps for	Technology	Service Conditions The Map Should	l Reflect	single PDF. Ente	Evidence: porting informatio er the page numb e exact location of	er(s) in the cell b	elow
n ID			е	Code	multi-residential units)	Challenge	Detail	this type of service (Enter 0-2000)	this type of service (Enter 0-2000)	Type	Is this location served, underserved, or unserved?	Technology Type	Sworn Statement/ Survey Response	Broadband study expressly citing location	Speed test at this location	Othe r
							Provider only:									•
							The Map does not correctly									
							reflect service									
							that I facilitate to this									
9157	1921 POPLAR AVENUE	GUTHRIE CENTI	EIA	50115	1	map	location	1000	250	Fiber						kmz of fiber infrastructur
							Provider only:									
							The Map does not correctly									
							reflect service									
							that I facilitate									
33063	6069 NESTER POINT	PANORA	IA	50216	1	reflected on the map	to this location	1000	250	Fiber						kmz of fiber infrastructur
.3302	0003 NESTERT OINT	TAIVOITA	IA.	30210		шар	Provider only:	1000	250	Tibei						Kinz of fiber limastractur
							The Map does									
							not correctly reflect service									
						11-Provider not	that I facilitate									
						reflected on the										
2104	6065 NESTER POINT	PANORA	IA	50216	1	map	location Provider only:	1000	250	Fiber						kmz of fiber infrastructu
							The Map does									
							not correctly									
						11-Provider not	reflect service									
						reflected on the										
7867	6022 MASON DRIVE	PANORA	IA	50216	1	map	location	1000	250	Fiber						kmz of fiber infrastructu
							Provider only: The Map does									
							not correctly									
							reflect service									
						11-Provider not reflected on the										
2525	6061 NESTER POINT	PANORA	IA	50216	1	map	location	1000	250	Fiber						kmz of fiber infrastructu
							Provider only:									
							The Map does not correctly									
							reflect service									
						11-Provider not reflected on the	that I facilitate to this									
3199	2393 190TH STREET	GUTHRIE CENTI	EIA	50115	1	map	location	1000	300	Fiber						kmz of fiber infrastructu
							Provider only:									
							The Map does not correctly									
							reflect service									
							that I facilitate									
6761	6808 PANORAMA DRIVE	PANORA	IA	50216	1	reflected on the map	to this location	1000	300	Fiber						kmz of fiber infrastructu
,					-		Provider only:	1000	300							
							The Map does									
							not correctly reflect service									
							that I facilitate									
20707	2021 OAK AVENUE	CHTUDIT CENT	EIA	E0115	4		to this	1000	200	Eibor						kmz of fibor infrastructure
9/8/	2021 OAK AVENUE	GUTHRIE CENTI	: IA	50115	1	map	location Provider only:	1000	300	Fiber						kmz of fiber infrastructu
							The Map does									
							not correctly reflect service									
						11-Provider not	that I facilitate									
						reflected on the	to this									
52555	2607 IOWA STATE HIGHWAY	GUTHRIE CENTI	ΕIΑ	50115	1	map	location Provider only:	1000	300	Fiber						kmz of fiber infrastructu
							The Map does									
							not correctly									
						11-Provider not	reflect service that I facilitate									
						reflected on the	to this									
1251	6015 GUTHRIE LANE	PANORA	IA	50216	1	map	location	1000	300	Fiber					1	kmz of fiber infrastructu

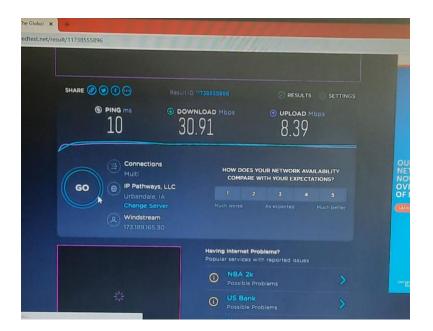
IA Locatio	Street Address	City	Stat	ZIP Code	No. of Units at address (house, multi-residential	Basis for Challenge	Challenge Detail	Fastest download speed in Mbps for this type of service	Fastest upload speed in Mbps for this type of service	Technology	Service Conditions The Map Should Reflect		single PDF. Ente identifying the	Evidence: orting informatio or the page numb exact location of	elow		
n ID				couc	units)	Chancinge	Detail	(Enter 0-2000)	(Enter 0-2000)	Туре	Is this location served, underserved, or unserved?	Technology Type	Sworn Statement/ Survey Response	Broadband study expressly citing location	Speed test at this location	Othe r	
1333069	1964 MAPLE AVENUE	GUTHRIE CENTI	E IA	50115	1	11-Provider not reflected on the map	to this location	1000	300	Fiber			·			kmz of fiber infrastru	ructure
208992	1974 NORTH LANE	GUTHRIE CENTI	E IA	50115	1	facilitates speeds faster than that reported on the map	Provider only: The Map does not correctly reflect service that I facilitate to this location	1000	300	Fiber						kmz of fiber infrastru	ructure
1018034	100 2nd Ave	Bayard	IA	50029	1	g., in-home speed test, sworn statement	Provider or Community: I am challenging a broadband provider				Underserved (25/3 < available service < 100/	2 Wired			Page 1,2		

		Location Challenge	Form: O	nly Use This Form To Indicate that a Lo	ation is Not Present o	or Improperly Located on the Map				Upload all support Enter the page ni	Evidence ting information fo umber(s) in the ce ocation of the pro	e: or this location in Il below identify of in the PDF.	a single PDF.					
IA Location ID (if existing)	Street Address	City	State		No. of Units at address (house, multi-residential units)	Basis	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	Sworn Statement/ Survey Response	Broadband study expressly citing location	Speed test at this location	Other					
	117 Main Street	Bagley	IA	50026 Business	1	1-Missing Broadband Serviceable Location	10	1 1	DSL			Page 4,5	While this addre	ss is missing from the map, prior maps showed oversta	ted Service Reported by Windstream	m. Speed test e	vidence shows level of service receiving	from Windstream.
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Speedtests conducted by a Bayard customer who subscribes to 100 mbps Internet service from Windstream.

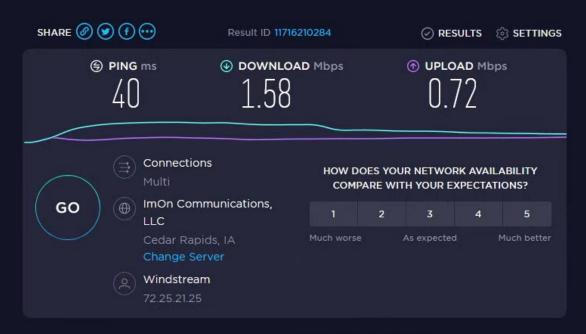






Speed Tests performed at Bagley Library.

△ Log In Apps Insights Network Developers **Enterprise** About



Having Internet Problems?

Popular services with reported issues

<u>(i)</u>	Adobe Creative Cloud Possible Problems	>
(i)	Amazon Possible Problems	>
\triangle	Call of Duty Problems	>
View a	all outages on downdetector.com	

speedtest.net/result/11716205926





s.g.doubleclick.net...





















APPENDIX D Notices





KIM REYNOLDS, GOVERNOR

ADAM GREGG, LT. GOVERNOR

10/3/2022

The Office did not receive a response to this Notice

Panora Communications Cooperative Andrew Randol andrewrandol@panoratelco.com Sent via email only

To whom it may concern:

This is a letter of inquiry concerning your organization's prior reporting to the State of Iowa Office of the Chief Information Officer ("OCIO" or "Office") regarding the availability of Broadband service at certain address location(s). Our Office received a timely-filed Challenge Form challenging information reported on the Broadband Availability Map Version 5 ("V5") of the Statewide Broadband Availability Map ("Map"). The data reflected on V5 of the Map was either: (1) provided by you to the Office's contractor, Connected Nation, during the data collection window of November 1, 2021 through February 11, 2022; (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 V5 identifies where Broadband service was offered or facilitated at speeds greater than 25/3 as of August 2, 2022. The Map also reflects a preliminary determination of 'likely eligible' or 'likely ineligible' based on speed, technology type, and previous incentives and is a prospective estimate of potential eligibility under various federal programs. The publication of the Map on August 2, 2022 triggered a formal 30-day challenge window during which time we received challenges citing or implicating your service. The challenge(s) we received claims that the data reflected on V5 of the Map is inaccurate. All timely-filed challenges can be found at https://ocio.iowa.gov/broadband-availability-map-version-5-challenge-process. To resolve this matter, the Office requests that your organization provide information concerning your service at the affected address locations as further identified and described below by October 24, 2022 at 5:00 CDT.

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 outlined in Iowa Code section 8B.10 does not apply. Similarly, within 30 days after the Office's official publication of the Map, the Office permitted any person or party aggrieved or adversely affected by such determination to challenge the office's finding by submitting a challenge form along with all evidence or information supporting the challenge. The

proffered bases for challenge largely mirror those offered by the FCC in their Broadband Data Collection efforts.

V5 of the Map currently shows that service offered at a particular address location renders that address location either likely eligible or likely ineligible for future federal grant funding. As part of the above-outlined process, OCIO received a formal challenge and supporting evidence from one or more lowa residents or Communications Service Provider(s), claiming that service your organization reports is insufficient to warrant the likely ineligible status of a particular address location.

At this time, the Office requests your assistance in making an accurate determination as to whether your organization in fact offers the speeds reported at each challenged address location as of August 2, 2022. To that end, the Office requests that you:

- 1) Complete and return the attached Challenge Notice Form (see Exhibit A, Affirmation tab), by **October 24, 2022 at 5:00 CDT**. Pursuant to this form, OCIO requests that a representative with legal authority to bind your organization:
 - a) Confirm that the speeds reported at the challenged address locations are correct as of August 2, 2022.
 - 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 address locations 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 at the applicable address location which identify the specific download and upload speeds provided or received as of August 2, 2022.

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

Please note that you are under no legal obligation to respond to this request for information. The Office permits any affected person or party to submit evidence or information to the Office in support of or in opposition to a challenge within 20 days after the challenge has been posted to ocio.iowa.gov/broadband">ocio.iowa.gov/broadband. However, this Office is affirmatively reaching out to notify you of the challenge, of the circumstances surrounding the challenge, and to solicit your feedback and position. If this Office does not receive your response via Exhibit A of the Form by **October 24, 2022 at 5:00 CDT**, the Office will make a final decision based on the evidence and information currently available to it.

Office of the Chief Information Officer State of Iowa

Sincerely,



	Broadband Map V5								
Office of the Chief Information Officer	Challenge Notice								
Aff:	EXHIBIT A ation of Service or Lack of Service at Address Locations								
	ation of Service of Lack of Service at Address Locations adband Availability Map Challenge Process Version 5								
A. RESPONDENT INFORMATION									
Company Name									
Address									
City									
State									
Zip									
	B. DESIGNATED CONTACT INFORMATION								
Contact Name									
Contact Phone Number									
Contact Email	C EVOLANATION								
provide narrative to further rebut this challen	C. EXPLANATION tion is required to ensure that you are communicating full and accurate information, you may age. You may consider uploading evidence to substantiate your claims as an attachment to this without sufficient and probative evidence may be inadequate to overcome a challenge.								
Du cigning and submitting this faces the set	D. AFFIRMATION								
	rized representative attests that to the best of the authorized representatives knowledge and challenge form is true and accurate, and the form is signed under the pains and penalties of								
_	your signature to this form and attesting to the accuracy of the information submitted herein.								
Authorized Signatures									

Authorized Signature:	
Title:	
Date:	

Challenger Docket Nos.	IA Location ID	Street Address	City	State	ZIP Code	Technology Type	Download Speed	Upload Speed	Evidence page number
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KIM REYNOLDS, GOVERNOR

ADAM GREGG, LT. GOVERNOR

10/3/2022

Windstream Corporation
Jason Tompkins
jason.tompkins@windstream.com
Sent via email only

To whom it may concern:

This is a letter of inquiry concerning your organization's prior reporting to the State of Iowa Office of the Chief Information Officer ("OCIO" or "Office") regarding the availability of Broadband service at certain address location(s). Our Office received a timely-filed Challenge Form challenging information reported on the Broadband Availability Map Version 5 ("V5") of the Statewide Broadband Availability Map ("Map"). The data reflected on V5 of the Map was either: (1) provided by you to the Office's contractor, Connected Nation, during the data collection window of November 1, 2021 through February 11, 2022; (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 V5 identifies where Broadband service was offered or facilitated at speeds greater than 25/3 as of August 2, 2022. The Map also reflects a preliminary determination of 'likely eligible' or 'likely ineligible' based on speed, technology type, and previous incentives and is a prospective estimate of potential eligibility under various federal programs. The publication of the Map on August 2, 2022 triggered a formal 30-day challenge window during which time we received challenges citing or implicating your service. The challenge(s) we received claims that the data reflected on V5 of the Map is inaccurate. All timely-filed challenges can be found at https://ocio.iowa.gov/broadband-availability-map-version-5-challenge-process. To resolve this matter, the Office requests that your organization provide information concerning your service at the affected address locations as further identified and described below by October 24, 2022 at 5:00 CDT.

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 outlined in Iowa Code section 8B.10 does not apply. Similarly, within 30 days after the Office's official publication of the Map, the Office permitted any person or party aggrieved or adversely affected by such determination to challenge the office's finding by submitting a challenge form along with all evidence or information supporting the challenge. The

proffered bases for challenge largely mirror those offered by the FCC in their Broadband Data Collection efforts.

V5 of the Map currently shows that service offered at a particular address location renders that address location either likely eligible or likely ineligible for future federal grant funding. As part of the above-outlined process, OCIO received a formal challenge and supporting evidence from one or more lowa residents or Communications Service Provider(s), claiming that service your organization reports is insufficient to warrant the likely ineligible status of a particular address location.

At this time, the Office requests your assistance in making an accurate determination as to whether your organization in fact offers the speeds reported at each challenged address location as of August 2, 2022. To that end, the Office requests that you:

- 1) Complete and return the attached Challenge Notice Form (see Exhibit A, Affirmation tab), by **October 24, 2022 at 5:00 CDT**. Pursuant to this form, OCIO requests that a representative with legal authority to bind your organization:
 - a) Confirm that the speeds reported at the challenged address locations are correct as of August 2, 2022.
 - 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 address locations 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 at the applicable address location which identify the specific download and upload speeds provided or received as of August 2, 2022.

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

Please note that you are under no legal obligation to respond to this request for information. The Office permits any affected person or party to submit evidence or information to the Office in support of or in opposition to a challenge within 20 days after the challenge has been posted to <a href="https://docs.ncb/ocio.com/o

Office of the Chief Information Officer

Sincerely,

State of Iowa



Broadband Map V5 Challenge Notice

EXHIBIT A

Affirmation of Service or Lack of Service at Address Locations Broadband Availability Map Challenge Process Version 5

A. RESPONDENT INFORMATION

Company Name

Address

City

State

Zip

Windstream Services, LLC

4001 North Rodney Parham Road

Little Rock

AR

72212

B. DESIGNATED CONTACT INFORMATION

Contact Name David Avery VP-Government Affairs

Contact Phone Number 501-748-5876

Contact Email <u>david.avery@windstream.com</u>

C. EXPLANATION

To the extent you believe additional explanation is required to ensure that you are communicating full and accurate information, you may provide narrative to further rebut this challenge. You may consider uploading evidence to substantiate your claims as an attachment to this Affirmation. An Affirmation submitted without sufficient and probative evidence may be inadequate to overcome a challenge.

Windstream response provided on affirmation tab of this workbook.

D. AFFIRMATION

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:	Brad Hedrick
Title:	President - State Operations
Date:	11/29/2022

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051P	139349	2442 645TH AVENUE	ALBIA	IA	52531	No Service	0	0	
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051P	695003	7064 172ND PLACE	ALBIA	IA	52531	DSL	18	2	
051P	391193	7079 189TH STREET	ALBIA	IA	52531	No Service	0	0	
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051P	276895	7111 189TH STREET	ALBIA	IA	52531	No Service	0	0	
051P	1249360	7141 165TH STREET	ALBIA	IA	52531	DSL	18	2	
051P	502633	7313 189TH STREET	ALBIA	IA	52531	DSL	55	5	
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051P	1095066	2572 ASH AVENUE	BATAVIA	IA	52533	No Service	0	0	
051P	297749	2602 BLADENSBURG ROAD	BATAVIA	IA	52533	DSL	18	2	
051P	1347193	3506 BLADENSBURG ROAD	BATAVIA	IA	52533	DSL No Comico	73	12	
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051P	252626	10535 240TH AVENUE	BLAKESBURG	IA	52536	No Service	0	0	
051P	773429	10973 240TH AVENUE	BLAKESBURG	IA	52536	No Service	0	0	
051P	203311	11352 235TH AVENUE	BLAKESBURG	IA	52536	No Service	0	0	
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051P	231552	23763 87TH STREET	BLAKESBURG	IA	52536	DSL	29	2	
051P	943865	23776 WHISKEY RIDGE	BLAKESBURG	IA	52536	DSL	29	2	
051P	1459537	23959 115TH STREET	BLAKESBURG	IA	52536	No Service	0	0	
051P	1083410	23981 87TH STREET	BLAKESBURG	IA	52536	No Service	0	0	
051P 051P	1387861 1032544	24005 115TH STREET 24008 115TH STREET	BLAKESBURG BLAKESBURG	IA IA	52536 52536	DSL DSL	29 55	2 5	
051P 051P	297202	24008 115TH STREET	BLAKESBURG	IA	52536	DSL	2	1	
051P	665496	24031 87TH STREET	BLAKESBURG	IA	52536	No Service	0	0	
051P	691059	24084 WHISKEY RIDGE	BLAKESBURG	IA	52536	DSL	109	10	
051P	93733	24227 87TH STREET	BLAKESBURG	IA	52536	DSL	82	10	
051P	259300	24332 WHISKEY RIDGE	BLAKESBURG	IA	52536	DSL	109	10	

Challenger Docket Nos.	IA Location	Street Address	City	State	ZIP Code	Technology Type	Download Speed	Upload Speed	Evidence page number
051P	1154997	24502 WHISKEY RIDGE	BLAKESBURG	IA	52536	No Service	0	0	1.3.
051P	201452	24544 WHISKEY RIDGE	BLAKESBURG	IA	52536	No Service	0	0	
051P	231686	24563 87TH STREET	BLAKESBURG	IA	52536	DSL	29	2	
051P	953328	24675 87TH STREET	BLAKESBURG	IA	52536	No Service	0	0	
051P	1381718	24897 87TH STREET	BLAKESBURG	IA	52536	DSL	82	10	
051P 051P	518639 1111389	24935 87TH STREET 7102 255TH STREET	BLAKESBURG BLAKESBURG	IA IA	52536 52536	DSL No Service	55 0	5 0	
051P 051P	995313	7102 235TH STREET	BLAKESBURG	IA	52536	DSL	2	1	
051P	305683	7130 235TH STREET	BLAKESBURG	IA	52536	DSL	5	1	
051P	722250	7147 235TH STREET	BLAKESBURG	IA	52536	DSL	5	1	
051P	777209	7191 255TH STREET	BLAKESBURG	IA	52536	No Service	0	0	
051P	633732	7197 235TH STREET	BLAKESBURG	IA	52536	DSL	5	1	
051P	718939	7204 235TH STREET 7223 235TH STREET	BLAKESBURG	IA IA	52536	DSL DSL	5 5	1	
051P 051P	977597 821472	7223 235TH STREET	BLAKESBURG BLAKESBURG	IA	52536 52536	DSL	12	2	
051P	429080	7249 235TH STREET	BLAKESBURG	IA	52536	DSL	12	2	
051P	891365	7363 235TH STREET	BLAKESBURG	IA	52536	DSL	47	3	
275R	129857	1418 150TH STREET	CRESTON	IA	50801	DSL	12	2	
199R	508126	3879 KIRKWOOD STREET	SAINT CHARLES	IA	50240	DSL	27	2	
051P	244922	12417 EAGLE DRIVE	SELMA	IA	52588	DSL	47	2	
051P	98646 1039134	12453 EAGLE DRIVE	SELMA	IA	52588	DSL DSL	31 31	2	
051P 051P	1471972	12607 EAGLE DRIVE	SELMA SELMA	IA IA	52588 52588	DSL	31	2	
051P	278233	13612 ACORN AVENUE	SELMA	IA	52588	DSL	5	1	
051P	1110880	14130 ACORN AVENUE	SELMA	IA	52588	No Service	0	0	
117R	633259	25844 GOLDEN OAK LANE	LONE TREE	IA	52755	DSL	31	2	
238R	627450	405 JACKI DRIVE	LONE TREE	IA	52755	DSL	27	2	
051P	1399909	1027 260TH STREET	ELDON	IA	52533	DSL	2	1	
051P	1261331	2130 IOWA HIGHWAY 16	ELDON	IA	52554	DSL DSL	19 19	2	
051P 051P	665400 1227616	2494 45TH STREET 2589 JEFFERSON WAPELLO	ELDON ELDON	IA IA	52554 52533	DSL	19	2	
051P	571984	2894 WASHINGTON ROAD	ELDON	IA	52554	DSL	12	2	
051P	1251783		ELDON			DSL	24	2	
051P	302143	2962 45TH STREET	ELDON	IA	52554	DSL	73	12	
051P		3148 CHIEF WAPELLO ROAD	ELDON	IA	52554	DSL	15	2	
051P	1225049	3223 42ND AVENUE	ELDON	IA	52554	DSL	15	2	
051P	1027729	3230 IOWA HIGHWAY 16	ELDON	IA	52554	DSL DSL	47 5	2	
051P 051P	151378 1387303	3414 WASHINGTON ROAD 3474 CHIEF WAPELLO ROAD	ELDON ELDON	IA IA	52554 52554	DSL	12	2	
051P	551495	3481 42ND AVENUE	ELDON	IA	52554	DSL	15	2	
051P	685672	3530 IOWA HIGHWAY 16	ELDON	IA	52554	DSL	86	17	
051P	625665	3655 42ND AVENUE	ELDON	IA	52554	No Service	0	0	
051P	1418665	3773 28TH STREET	ELDON	IA	52554	DSL	27	2	
051P	865718	3796 WASHINGTON ROAD	ELDON	IA	52554	DSL	5	1	
051P 051P	1312390	3880 IOWA HIGHWAY 16	ELDON ELDON	IA	52554	DSL No Service	73 0	12 0	
051P 051P	708382 1432100	3913 42ND AVENUE 3946 IOWA HIGHWAY 16	ELDON	IA IA	52554 52554	DSL	111	32	
051P	991373	3997 28TH STREET	ELDON	IA	52554	DSL	24	2	
051P	555969	4053 28TH STREET	ELDON	IA	52554	DSL	24	2	
051P	660312	4143 IOWA HIGHWAY 16	ELDON	IA	52554	DSL	184	52	
051P	1342925	4216 IOWA HIGHWAY 16	ELDON	IA	52554	DSL	184	52	
051P	85225	4220 WASHINGTON ROAD	ELDON	IA	52554	DSL DSL	15	2 52	
051P 051P	1198983 1061327	4290 IOWA HIGHWAY 16 4482 IOWA HIGHWAY 16	ELDON ELDON	IA IA	52554 52554	DSL	209 96	23	
051P	905236	4562 35TH AVENUE	ELDON	IA	52554	DSL	184	52	
051P	314450	471 13TH STREET	ELDON	IA	52554	DSL	24	2	
051P	917490	475 13TH STREET	ELDON	IA	52554	DSL	24	2	
051P	455592	5187 IOWA HIGHWAY 16	ELDON	IA	52554	DSL	19	2	
051P	463186	5324 35TH AVENUE	ELDON	IA	52554	DSL	31	2	
063R	214821	431 ARMORY AVENUE	CHARITON	IA IA	50049	DSL	47	2	
252R 041P	906197	22880 277TH AVENUE 13687 288TH AVENUE	LECLAIRE SOUTH ENGLISH	IA IA	52753 52335	No Service	19	2	
041P	354920	13768 280TH AVENUE	SOUTH ENGLISH	IA	52335	No Service	0	0	
041P	1299591	13969 288TH AVENUE	SOUTH ENGLISH	IA	52335	No Service	0	0	
041P	1103575	14851 290TH AVENUE	SOUTH ENGLISH	IA	52335	No Service	0	0	
041P	548853	15348 290TH AVENUE	SOUTH ENGLISH	IA	52335	No Service	0	0	
041P	1355583	15657 290TH AVENUE	SOUTH ENGLISH	IA	52335	No Service	0	0	
041P	609505	15664 280TH AVENUE	SOUTH ENGLISH	IA	52335	No Service	0	0	

Challenger	IA Location	Street Address	City	State	ZIP Code	Technology	Download Speed	Upload Speed	Evidence
Docket Nos.	ID 894954	15780 290TH AVENUE	SOUTH ENGLISH	IA	52335	Type No Service	Speed 0	Speed 0	page number
041P	1281466	27499 150TH STREET	SOUTH ENGLISH	IA	52335	No Service	0	0	
041P	119214	28172 170TH STREET	SOUTH ENGLISH	IA	52335	No Service	0	0	
041P	870105	28364 HIGHWAY 22	SOUTH ENGLISH	IA	52335	No Service	0	0	
041P	10376	29941 160TH STREET	SOUTH ENGLISH	IA	52335	No Service	0	0	
041P	348896	14418 312TH AVENUE	KEOTA	IA	52248	No Service	0	0	
112R 239R	502624 1068511	10622 NORTHEAST 134TH 10533 Q AVENUE	MAXWELL MAYNARD	IA IA	50161 50655	DSL DSL	29 5	2 1	
051P	16562	10533 Q AVENUE	OTTUMWA	IA	52501	DSL	15	2	
094R	1277738	10863 WAPELLO-KEOKUK	OTTUMWA	IA	52501	DSL	82	10	
051P	1060245	3603 BLADENSBURG ROAD	OTTUMWA	IA	52501	DSL	96	23	
051P	1032603	3703 BLADENSBURG ROAD	OTTUMWA	IA	52501	DSL	123	52	
051P	1087516	4485 BLADENSBURG ROAD	OTTUMWA	IA	52501	DSL DSL	86 12	17	
051P 051P	816755 450317	4941 100TH STREET 4966 BLADENSBURG ROAD	OTTUMWA OTTUMWA	IA IA	52501 52501	DSL	24	2	
246R	1465612	6493 CEMETERY ROAD	OTTUMWA	IA	52501	DSL	19	2	
165R	1366480	229 CEDAR PARK ROAD	MOUNT VERNON	IA	52314	DSL	55	5	
051P	726158	2603 710TH AVENUE	MORAVIA	IA	52571	No Service	0	0	
051P	356572	2624 690TH AVENUE	MORAVIA	IA	52571	DSL	111	32	
051P	194088	2709 710TH AVENUE	MORAVIA	IA	52571	No Service	0	0	
051P 051P	47658 298986	2773 710TH AVENUE 6948 264TH STREET	MORAVIA MORAVIA	IA IA	52571 52571	No Service DSL	0 123	0 52	
051P 051P	1146307	7041 264TH STREET	MORAVIA	IA	52571	No Service	0	0	
051P	1077120	7053 264TH STREET	MORAVIA	IA	52571	No Service	0	0	
051P	529459	7054 264TH STREET	MORAVIA	IA	52571	No Service	0	0	
073R	1049146	22192 179TH AVENUE	MANCHESTER	IA	52057	DSL	12	2	
262R	1481570	215 WEST WILLOW	CLARINDA	IA	51632	Fiber	1000	1000	
284R 313R	1482426 1483306	3079 220TH 623 SUNSET	CLARINDA CLARINDA	IA IA	51632 51632	DSL Fiber	109 1000	10 1000	
267R	1478984	706 WEST MAIN	CLARINDA	IA	51632	Fiber	1000	1000	
351R,352R	609714	1050 VULCAN AVENUE	SOLON	IA	52333	DSL	15	2	
361R,101R,	539664	1940 SAINT BRIDGETS ROAD	SOLON	IA	52333	DSL	55	5	
253R	1116445	4588 SUTLIFF ROAD	SOLON	IA		DSL	55	5	
174R	259369	118 NORTH COLUMBIA	GRANDVIEW	IA	52752	DSL	184	52	
051P 051P	94015 706520	11153 145TH STREET 11752 205TH ROAD	DOUDS DOUDS	IA IA	52551 52551	No Service DSL	5	0	
051P	116201	12676 172ND STREET	DOUDS	IA	52551	DSL	86	17	
051P	1120057	12715 EAGLE DRIVE	DOUDS	IA	52551	DSL	111	32	
051P	1013784	12833 185TH ROAD	DOUDS	IA	52551	DSL	123	52	
051P	247142	12947 EAGLE DRIVE	DOUDS	IA	52551	DSL	184	52	
051P	531515	12997 185TH ROAD	DOUDS	IA	52551	DSL	209	52	
051P 051P	1208889 1415423	13036 EAGLE DRIVE 13091 EAGLE DRIVE	DOUDS DOUDS	IA IA	52551 52551	DSL DSL	209 184	52 52	
051P	1404205	13225 185TH ROAD	DOUDS		52551	DSL	123	52	
051P	968493	13323 172ND STREET	DOUDS	IA	52551	DSL	184	52	
051P	1138364	13461 BETHEL ROCK	DOUDS	IA	52551	DSL	96	23	
051P	980922	13487 172ND STREET	DOUDS		52551	DSL	123	52	
051P	394276	13488 172ND STREET	DOUDS	IA	52551	DSL No Service	123	52	
051P 051P	863366 71814	13658 200TH ROAD 13747 BETHEL ROCK	DOUDS DOUDS	IA IA	52551 52551	No Service DSL	0 47	0	
051P	949124	13803 185TH ROAD	DOUDS		52551	DSL	2	1	
051P	10514	13850 160TH STREET	DOUDS	IA	52551	DSL	12	2	
051P	806530	13857 172ND STREET	DOUDS	IA	52551	DSL	73	12	
051P	900119	13858 200TH ROAD	DOUDS	IA	52551	No Service	0	0	
051P	1095781	13879 160TH STREET	DOUDS		52551	DSL DSL	12 47	2	
051P 051P	104761 296773	13983 172ND STREET 13989 185TH ROAD	DOUDS DOUDS	IA IA	52551 52551	DSL	2	1	
051P	877700	13997 BETHEL ROCK	DOUDS		52551	DSL	31	2	
051P	163468	14038 160TH STREET	DOUDS	IA	52551	DSL	12	2	
051P	145105	14212 205TH ROAD	DOUDS	IA	52551	No Service	0	0	
051P	591676	14466 172ND STREET	DOUDS		52551	DSL No Comine	19	2	
051P 051P	486332 456400	14723 110TH STREET	DOUDS DOUDS	IA IA	52551 52551	No Service No Service	0	0	
051P 051P	508423	14727 110TH STREET 14771 110TH STREET	DOUDS		52551	No Service	0	0	
051P	882413	15091 110TH STREET	DOUDS		52551	No Service	0	0	
051P	124586	16083 ROUTE V64	DOUDS		52551	DSL	15	2	
051P	1062290		DOUDS	IA	52551	DSL	31	2	
051P	687940	16308 DEWBERRY AVENUE	DOUDS	IA	52551	DSL	31	2	

Challenger Docket Nos.	IA Location	Street Address	City	State	ZIP Code	Technology Type	Download Speed	Upload Speed	Evidence page number
051P	74876	16525 ROUTE V64	DOUDS	IA	52551	DSL	5 Speed 5	3peeu 1	page number
051P	128025	16543 ROUTE V64	DOUDS	IA	52551	DSL	5	1	
051P	183911	16655 ROUTE V64	DOUDS	IA	52551	DSL	12	2	
051P	1239464	16701 ROUTE V64	DOUDS	IA	52551	DSL	5	1	
051P	466459	16873 ROUTE V64	DOUDS	IA	52551	DSL	12	2	
051P	883859	17899 ROUTE V64	DOUDS	IA	52551	DSL DSL	5 12	1 2	
051P 051P	768207 1362159	17931 ROUTE V64 18081 ROUTE V64	DOUDS DOUDS	IA IA	52551 52551	DSL	12	2	
051P	1220266	18411 ROUTE V64	DOUDS	IA	52551	DSL	5	1	
348R	1486425	15498 200TH ST	ELMA	IA	50628	DSL	47	3	
051P	180886	20853 ROUTE V64	KEOSAUQUA	IA	52565	No Service	0	0	
286R	1195586	1045 210TH PLACE	PELLA	IA	50219	DSL	2	1	
344R	312869	1185 164TH DRIVE	PELLA	IA	50219	DSL	109	10	
332R 362R	742339	157 HOLLAND DRIVE 1644 BRIAR LANE	PELLA PELLA	IA IA	50219 50219	DSL DSL	96 82	23 10	
229R	1460398 1277303	753 182ND AVENUE	PELLA	IA	50219	DSL	27	2	
251R	1364349	758 187TH PLACE	PELLA	IA	50219	DSL	19	2	
124R,172R	1350368	761 187TH PLACE	PELLA	IA	50219	DSL	18	2	
130R	1118727	762 187TH PLACE	PELLA	IA	50219	DSL	19	2	
146R	319285	778 185TH PLACE	PELLA	IA	50219	DSL	47	2	
116R	46728	787 183RD PLACE	PELLA	IA	50219	DSL	47	3	
152R	1159412	789 183RD PLACE	PELLA	IA	50219	DSL DSL	47 86	3 17	
177R 093R	199031 922302	814 EAST 2ND STREET 14951 NORTHWEST	PELLA MADRID	IA IA	50219 50156	DSL	109	10	
224R	1391649	2497 KELP AVENUE	FAIRFIELD	IA	52556	No Service	0	0	
223R	210495	2517 KELP AVENUE	FAIRFIELD	IA	52556	No Service	0	0	
233R	201321	1409 WEST JACKSON	KNOXVILLE	IA	50138	DSL	5	1	
086R	1166324	1414 DEER RUN DRIVE	KNOXVILLE	IA	50138	DSL	27	2	
032P	267012	17351 COUNTY ROAD G44X	LETTS	IA	52754	DSL	152	52	
032P	440767	17398 COUNTY ROAD G44X	LETTS	IA	52754	DSL No Service	152	52	
051P 051P	306841 1442513	15008 105TH ROAD 15432 105TH ROAD	LIBERTYVILLE LIBERTYVILLE	IA IA	52567 52567	No Service	0	0	
051P		1544 270TH STREET	LIBERTYVILLE	IA	52567	DSL	2	1	
051P		1567 270TH STREET	LIBERTYVILLE	IA	52567	DSL	2	1	
051P	1163373	1680 250TH STREET	LIBERTYVILLE	IA	52556	DSL	12	2	
051P		2643 FIR AVENUE	LIBERTYVILLE	IA	52567	No Service	0	0	
051P		2672 DOUDS ROAD	LIBERTYVILLE	IA	52567	DSL	5	1	
051P	64476	2680 DOUDS ROAD 2715 EASTWOOD AVENUE	LIBERTYVILLE	IA	52567	DSL No Service	0	1 0	
051P 051P		2713 EASTWOOD AVENUE	LIBERTYVILLE LIBERTYVILLE	IA IA	52567 52567	No Service	0	0	
272R		204 GREENE STREET	WALKER	IA	52352	DSL	184	52	
064R		3485 WALKER ROAD	WALKER	IA	52352	DSL	12	2	
071R	292236	23268 STATE HIGHWAY 92	COLUMBUS	IA	52738	DSL	31	2	
178R		2591 P AVENUE	WILLIAMSBURG	IA	52361	DSL	82	10	
287R		2707 N AVENUE	WILLIAMSBURG	IA	52361	DSL	109	10	
290R		13556 130TH STREET	WAPELLO	IA	52653	DSL DSL	55 18	5	
051P 051P		6420 CEMETERY ROAD 6468 CEMETERY ROAD	AGENCY AGENCY	IA IA	52530 52530	DSL	19	2	
051P		6884 CEMETERY ROAD	AGENCY	IA	52530	DSL	27	2	
051P		6953 CAMP ARROWHEAD	AGENCY	IA	52530	DSL	5	1	
051P		6962 CEMETERY ROAD	AGENCY	IA	52530	DSL	47	3	
051P		7008 CEMETERY ROAD	AGENCY	IA	52530	DSL	47	3	
051P		8255 FOX HILLS ROAD	AGENCY	IA	52530	DSL	18	2	
051P 051P	1159497 626119	8461 FOX HILLS ROAD 8469 FOX HILLS ROAD	AGENCY AGENCY	IA IA	52530 52530	DSL DSL	12 12	2	
051P 051P	565045	8583 FOX HILLS ROAD	AGENCY	IA IA	52530	DSL	12	2	
051P	115101	8711 FOX HILLS ROAD	AGENCY	IA	52530	DSL	12	2	
051P	1465091	8723 FOX HILLS ROAD	AGENCY	IA	52530	DSL	5	1	
051P	64303	8731 FOX HILLS ROAD	AGENCY	IA	52530	DSL	5	1	
051P	1212338	8755 FOX HILLS ROAD	AGENCY	IA	52530	DSL	5	1	
051P		8991 FOX HILLS ROAD	AGENCY	IA	52530	DSL	5	1	
051P	707249	9015 FOX HILLS ROAD	AGENCY	IA	52530	DSL	5	1	

Kinetic's Internal Qualification Process

Kinetic utilizes a process known as "UQUAL" in order to determine the maximum download and upload speed that a location should be capable of receiving from Kinetic broadband service. At its essence, the process identifies the latitude and longitude of a given location and uses those coordinates to determine the proximity of the location to existing Kinetic infrastructure. That proximity is then used to determine the maximum level of service that the location should be capable of receiving.

The exact mechanism in which UQUAL operates varies by technology type:

Fiber: When a fiber build is designed, Kinetic planning engineers create polygons encompassing all of the addresses that the build is intended to serve. Upon completion of the build, all locations within the polygon qualify for fiber services delivering a minimum of 1 Gbps symmetrical download and upload. UQUAL identifies whether or not the location falls within a completed polygon and assigns it the appropriate 1G qualification to the location if so.

Cable: UQUAL references the location's address against a specific list of addresses that fall within Kinetic's cable design areas and assigns a cable qualification if a match is found. These addresses are qualified for download speeds of 1 Gbps, although Kinetic cable service does not offer symmetrical download and upload speeds.

Copper/DSL: To determine qualification of a location via DSL service, UQUAL uses the location's coordinates to calculate the distance from the location along the available copper path to the nearest serving terminal. This distance is known as the loop length. Qualification is then calculated based upon what the serving device is capable of providing over that loop length.

Fixed Wireless: UQUAL plots the location onto a propagation map that indicates the coverage of Kinetic's fixed wireless network. If the location is determined to be within line of sight and serving range of a Kinetic tower, UQUAL translate the signal strength indicated by the propagation map into a qualification for the location.

It is possible that a location may qualify for service via multiple technology types. In this event, UQUAL will assign the technology type offering the greatest speed.





STATE OF IOWA

KIM REYNOLDS, GOVERNOR

ADAM GREGG, LT. GOVERNOR

November 18, 2022

Windstream Corporation
Jason Tompkins
jason.tompkins@windstream.com
Sent via email only

To whom it may concern:

This is a letter of inquiry concerning your organization's prior reporting to the State of Iowa Office of the Chief Information Officer ("OCIO" or "Office") regarding the availability of Broadband service at certain address location(s). Our Office received a timely-filed Challenge Form challenging information reported on the Broadband Availability Map Version 5 ("V5") of the Statewide Broadband Availability Map ("Map"). The data reflected on V5 of the Map was either: (1) provided by you to the Office's contractor, Connected Nation, during the data collection window of November 1, 2021 through February 11, 2022; (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 V5 identifies where Broadband service was offered or facilitated at speeds greater than 25/3 as of August 2, 2022. The Map also reflects a preliminary determination of 'likely eligible' or 'likely ineligible' based on speed, technology type, and previous incentives and is a prospective estimate of potential eligibility under various federal programs. The publication of the Map on August 2, 2022 triggered a formal 30-day challenge window during which time we received challenges citing or implicating your service. The challenge(s) we received claims that the data reflected on V5 of the Map is found inaccurate. All timely-filed challenges be can at https://ocio.iowa.gov/broadband-availability-map-version-5-challenge-process. To resolve this matter, the Office requests that your organization provide information concerning your service at the affected address locations as further identified and described below by November 26, 2022 at 11:59 p.m. CST.

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 outlined in Iowa Code section 8B.10 does not apply. Similarly, within 30 days after the Office's official publication of the Map, the Office permitted any person or party aggrieved or adversely affected by such determination to challenge the office's finding by submitting a challenge form along with all evidence or information supporting the

challenge. The proffered bases for challenge largely mirror those offered by the FCC in their Broadband Data Collection efforts.

V5 of the Map currently shows that service offered at a particular address location renders that address location either likely eligible or likely ineligible for future federal grant funding. As part of the above-outlined process, OCIO received a formal challenge and supporting evidence from one or more lowa residents or Communications Service Provider(s), claiming that service your organization reports is insufficient to warrant the likely ineligible status of a particular address location.

At this time, the Office requests your assistance in making an accurate determination as to whether your organization in fact offers the speeds reported at each challenged address location as of August 2, 2022. To that end, the Office requests that you:

- 1) Complete and return the attached Challenge Notice Form (see Exhibit A, Affirmation tab), by **November 26, 2022 at 11:59 p.m. CST**. Pursuant to this form, OCIO requests that a representative with legal authority to bind your organization:
 - a) Confirm that the speeds reported at the challenged address locations are correct as of August 2, 2022.
 - 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 address locations 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 at the applicable address location which identify the specific download and upload speeds provided or received as of August 2, 2022.

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

Please note that you are under no legal obligation to respond to this request for information. The Office permits any affected person or party to submit evidence or information to the Office in support of or in opposition to a challenge within 20 days after the challenge has been posted to ocio.iowa.gov/broadband. However, this Office is affirmatively reaching out to notify you of the challenge, of the circumstances surrounding the challenge, and to solicit your feedback and position. If this Office does not receive your response via Exhibit A of the Form by **November 26, 2022 at 11:59 p.m. CST**, the Office will make a final decision based on the evidence and information currently available to it.

Sincerely,

Office of the Chief Information Officer State of Iowa



Broadband Map V5 Challenge Notice

EXHIBIT A

Affirmation of Service or Lack of Service at Address Locations Broadband Availability Map Challenge Process Version 5

A. RESPONDENT INFORMATION

Company Name Windstream Services, LLC
Address 4001 North Rodney Parham Road
City Little Rock

State AR Zip 72212

B. DESIGNATED CONTACT INFORMATION

Contact Name Logan Shine
Contact Phone Number 515-321-0194

Contact Email <u>logan.shine@windstream.com</u>

C. EXPLANATION

To the extent you believe additional explanation is required to ensure that you are communicating full and accurate information, you may provide narrative to further rebut this challenge. You may consider uploading evidence to substantiate your claims as an attachment to this Affirmation. An Affirmation submitted without sufficient and probative evidence may be inadequate to overcome a

Windstream had provided responses on the affirmation tab of this workbook.

D. AFFIRMATION

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:	Brad Hedrick
Title:	President - State Operations
Date:	11/21/2022

Challenger	IA Location						Download	Upload	Evidence
Docket Nos.	ID	Street Address	City	State	ZIP Code	Technology Type	Speed	Speed	page number
102R	689105	33492 HIGHWAY 57	APLINGTON	IA	50604	Fixed Wireless	109	10	
137R	504841	2342 HIGHWAY 14	COLUMBIA	IA	50057	DSL	31	2	
266R	1483811	700 SOUTH 16TH	CLARINDA	IA	51632	Fiber	1000	1000	
266R	1483811	700 SOUTH 16TH	CLARINDA	IA	51632	Fiber	1000	1000	
279R	1480528	214 EAST NISHNA	CLARINDA	IA	51632	Fiber	1000	1000	
309R	1065290	1628 BIRCH LANE	PELLA	IA	50219	Fixed Wireless	109	10	
372R	742331	1636 BIRCH LANE	PELLA	IA	50219	Fixed Wireless	109	10	
390R	863790	1634 BRIAR LANE	PELLA	IA	50219	Fixed Wireless	109	10	
405R	507676 527951	1619 BRIAR LANE	PELLA PELLA	IA	50219 50219	Fixed Wireless	109 109	10 10	
413R	52/951	1206 HIGHWAY 102	PELLA	IA	50219	Fixed Wireless	109	10	
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Kinetic's Internal Qualification Process

Kinetic utilizes a process known as "UQUAL" in order to determine the maximum download and upload speed that a location should be capable of receiving from Kinetic broadband service. At its essence, the process identifies the latitude and longitude of a given location and uses those coordinates to determine the proximity of the location to existing Kinetic infrastructure. That proximity is then used to determine the maximum level of service that the location should be capable of receiving.

The exact mechanism in which UQUAL operates varies by technology type:

Fiber: When a fiber build is designed, Kinetic planning engineers create polygons encompassing all of the addresses that the build is intended to serve. Upon completion of the build, all locations within the polygon qualify for fiber services delivering a minimum of 1 Gbps symmetrical download and upload. UQUAL identifies whether or not the location falls within a completed polygon and assigns it the appropriate 1G qualification to the location if so.

Cable: UQUAL references the location's address against a specific list of addresses that fall within Kinetic's cable design areas and assigns a cable qualification if a match is found. These addresses are qualified for download speeds of 1 Gbps, although Kinetic cable service does not offer symmetrical download and upload speeds.

Copper/DSL: To determine qualification of a location via DSL service, UQUAL uses the location's coordinates to calculate the distance from the location along the available copper path to the nearest serving terminal. This distance is known as the loop length. Qualification is then calculated based upon what the serving device is capable of providing over that loop length.

Fixed Wireless: UQUAL plots the location onto a propagation map that indicates the coverage of Kinetic's fixed wireless network. If the location is determined to be within line of sight and serving range of a Kinetic tower, UQUAL translate the signal strength indicated by the propagation map into a qualification for the location.

It is possible that a location may qualify for service via multiple technology types. In this event, UQUAL will assign the technology type offering the greatest speed.

