## BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Siebin		Chair	
Joseph Sullivan		Vice Chair	
Valerie Means		Commissioner	
Matt Schuerger		Commissioner	
John Tuma		Commissioner	
Application of AMG Technology	)		
Investment Group, LLC d/b/a NextLink	)		
Internet for Designation as an Eligible		Docket No	
Telecommunications Carrier for the Purpose			
of Providing Services Supported by the			
FCC's Rural Digital Opportunity Fund	)		

## SUMMARY OF FILING

Pursuant to section 214(e) of the Communications Act of 1934 and applicable provisions of the Minnesota Administrative Rules, AMG Technology Investment Group, LLC d/b/a NextLink Internet (NextLink Internet) respectfully requests that the Minnesota Public Utilities Commission grant NextLink Internet designation as an Eligible Telecommunications Carrier in certain census blocks in Minnesota for purposes of receiving support from the federal Universal Service Fund high-cost program awarded to NextLink Internet through the recently completed Rural Digital Opportunity Fund Auction so that it can deploy high-speed broadband and voice communications in the proposed service area.

## BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Siebin Joseph Sullivan Valerie Means Matt Schuerger John Tuma Chair Vice Chair Commissioner Commissioner

Application of AMG Technology Investment Group, LLC d/b/a NextLink Internet for Designation as an Eligible Telecommunications Carrier for the Purpose of Providing Services Supported by the FCC's Rural Digital Opportunity Fund

Docket No. \_\_\_\_\_

## APPLICATION OF AMG TECHNOLOGY INVESTMENT GROUP, LLC D/B/A NEXTLINK INTERNET FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER

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AMG Technology Investment Group, LLC d/b/a NextLink Internet (NextLink Internet or

the Company), by its counsel, respectfully submits this Application for Designation as an

Eligible Telecommunications Carrier (ETC) pursuant to section 214(e)(2) of the

Communications Act of 1934, as amended (the Act), section 54.201 et seq. of the rules of the

Federal Communications Commission (FCC), applicable parts of the Minnesota Statutes

(including Chapter 237), and applicable provisions of the Minnesota Administrative Rules

(including Chapters 7811 and 7812) (Application). NextLink Internet requests that the

Minnesota Public Utilities Commission (PUC) grant it designation as an ETC in the proposed

service area for purposes of receiving support from the federal Universal Service Fund (USF),

including support through the FCC's high-cost USF program.<sup>1</sup> Specifically, NextLink Internet

<sup>&</sup>lt;sup>1</sup> As discussed below, high-cost ETCs are expected to participate in the low-income (Lifeline) program as well. Consequently, NextLink Internet seeks designation to operate within, and receive funding from, both federal USF programs. The Company is not seeking funding through any state high-cost or Lifeline programs at this time.

seeks designation as an ETC to receive funding awarded to the Company through the recently completed Rural Digital Opportunity Fund (RDOF) Auction so that it can deploy broadband and voice communications in certain unserved territories in Minnesota.<sup>2</sup>

NextLink Internet has recently completed participation in the RDOF Auction, seeking high-cost funding to extend broadband and digital voice services into a number of rural markets in Minnesota and eleven other states.<sup>3</sup> The Company's bidding was successful in all twelve states and NextLink Internet has been awarded support in 384 census blocks in Minnesota.<sup>4</sup> Given the prohibitive costs to undertake such expansion of services, the support available through the RDOF Auction is essential to NextLink Internet's ability to proceed with its operational plan. Even after selection as a winning bidder, however, the Company cannot begin to provide the supported services until it is properly designated as an ETC within the supported areas. Therefore, to prevent delays in deployment of critical high-speed broadband and voice services in these rural areas, NextLink Internet respectfully requests that the PUC expeditiously review and approve this Application.

#### I. Introduction

#### A. The Company

NextLink Internet is a limited liability company formed in the State of Texas on January 3, 2012. The Company's principal place of business is 95 Parker Oaks Lane, Hudson Oaks, TX

<sup>&</sup>lt;sup>2</sup> Information regarding the RDOF Auction is available at <u>https://www.fcc.gov/auction/904</u>.

<sup>&</sup>lt;sup>3</sup> The other states are Illinois, Indiana, Iowa, Kansas, Louisiana, Nebraska, New Mexico, Oklahoma, Texas, Wisconsin, and Wyoming.

 <sup>&</sup>lt;sup>4</sup> See Rural Digital Opportunity Fund Phase I Auction (Auction 904) Closes, Winning Bidders Announced, FCC Form 683 Due January 29, 2021, AU Docket No. 20-34; WC Docket Nos. 19-126 and 10-90, Public Notice, DA 20-1422, Attachment A at 1-2 (rel. Dec. 7, 2020) (Auction Award PN). A copy of the FCC's Auction Award PN is provided as *Exhibit 1*.

76087. NextLink Internet is privately-held, with the controlling interest held by William Baker, a U.S. citizen, through intermediary holding companies.

NextLink Internet is a provider of high-speed Internet and Voice-over-Internet-Protocol (VoIP) Services, serving residential, business, and government customers. The Company has successfully operated in Texas for more than seven years and as an ETC in Illinois, Iowa, Kansas, Nebraska, Oklahoma, and Texas for purposes of providing services supported by high-cost Connect America Fund Phase II (CAF II) funding from the FCC since 2019.<sup>5</sup> Through its years of operations, NextLink Internet has established the financial stability and demonstrated the technical expertise to provide the proposed services.<sup>6</sup> The Company remains on a substantial and continuing growth trajectory, with 55 percent average year-over-year growth in customer base from 2015 through 2020 and a corresponding churn rate of less than 1 percent (which is well below industry standards for Internet Service Providers). NextLink Internet has faithfully met its CAF II deployment and service obligations and successfully operated consistent with the obligations of its ETC designation in its service territory. NextLink Internet provides its services utilizing fixed wireless and fiber optic technologies.<sup>7</sup>

NextLink Internet is registered to conduct business in Minnesota, and the Company's certificates of authority, good standing, and assumed name from the Minnesota Secretary of State are provided as *Exhibit 3*.

<sup>&</sup>lt;sup>5</sup> NextLink Internet previously has provided its services on a largely unregulated basis; however, in connection with the Company's evolving business plans, on May 22, 2018, NextLink Internet was granted a Service Provider Certificate of Operating Authority (SPCOA) for the provision of local exchange telecommunications services in Texas. The Company also holds a Certificate of Convenience and Necessity in Oklahoma.

<sup>&</sup>lt;sup>6</sup> Materials describing the Company's management team are provided as *Exhibit 2*.

<sup>&</sup>lt;sup>7</sup> The Company holds nearly 1,000 FCC point-to-point fixed wireless licenses. Details for these licenses are available at <u>https://wireless2.fcc.gov/UlsApp/UlsSearch/searchLicense.jsp</u>.

## **B.** Contacts

All correspondence, communications, pleadings, notices, orders, inquiries, and decisions

relating to this Application should be addressed to:

Joshua T. Guyan Chris M. Laughlin Kelley Drye & Warren LLP 3050 K Street, NW, Suite 400 Washington, D.C. 20007 Tel: (202) 342-8566 jguyan@kelleydrye.com claughlin@kelleydrye.com

with a copy to:

Eric Pyland, Chief Financial Officer AMG Technology Investment Group, LLC d/b/a NextLink Internet 95 Parker Oaks Lane Hudson Oaks, TX 76087 epyland@team.nxlink.com

## C. RDOF Auction

The FCC established the RDOF as a continuation of its efforts to accelerate deployment of high-speed fixed broadband service capable of speeds of at least 25 Mbps download and 3 Mbps upload to unserved and underserved Americans in rural areas.<sup>8</sup> The auction is taking place in two phases. The recently-completed Phase I awarded funds to serve areas that are wholly unserved by fixed broadband service at speeds of 25/3 Mbps.<sup>9</sup> Phase II will award funds to serve areas that are only partially served and census blocks unawarded in the Phase I auction.<sup>10</sup> The FCC awards RDOF support through a competitive bidding process to qualified applicants who

<sup>&</sup>lt;sup>8</sup> See Rural Digital Opportunity Fund; Connect America Fund, WC Docket Nos. 14-259 and 10-90, Report and Order, FCC 20-5, ¶ 4 (Feb. 7, 2020) (RDOF Order).

<sup>&</sup>lt;sup>9</sup> *Id.*, ¶¶ 5, 9.

 $<sup>^{10}</sup>$  *Id*.

commit to deploy and maintain voice and broadband service of at least 25/3 Mbps in the identified high cost areas.<sup>11</sup> The FCC determined which applicants qualified for the auction by evaluating, among other things, the companies' operational history, financial qualifications, and proposed services.<sup>12</sup> Following submission of short-form applications in July 2020, the FCC released a list of companies qualified to participate in the auction.<sup>13</sup>

The RDOF Auction began on October 29, 2020 and completed on November 25, 2020. On December 7, 2020, the FCC issued a Public Notice, officially announcing the results of the competitive bidding.<sup>14</sup> NextLink Internet was awarded \$429,228,073 in funding over ten years to serve a total of 206,136 locations in twelve states.<sup>15</sup> In Minnesota, the Company was awarded \$3,736,316.00 over ten years to build out and operate a network for advanced communications serving 1,408 locations in 384 census blocks.<sup>16</sup>

The FCC's rules for the RDOF Auction did not require that auction participants have ETC designations to file a short-form application, participate in the RDOF Auction, or file a long-form application after winning support in the auction. Rather, a company that is awarded

<sup>&</sup>lt;sup>11</sup> See id.,  $\P 4$ .

<sup>&</sup>lt;sup>12</sup> Auction rules require that applicants either (i) demonstrate two years of experience providing a voice, broadband, and/or electric distribution or transmission service and submit one year of audited financials (or, for an otherwise-qualified applicant that is not audited in the ordinary course of business, one year of unaudited financials with its short-form application and one year of audited financials within 180 days after being announced as a winning bidder) or (ii) submit three years of audited financials with the short-form application and a letter of interest from a qualified bank willing to issue a letter of credit for a specified amount. *Id.*, ¶ 80.

<sup>&</sup>lt;sup>13</sup> See 386 Applicants Qualified to Bid in the Rural Digital Opportunity Fund Phase I Auction (Auction 904); Bidding To Begin On October 29, 2020, AU Docket No. 20-34; WC Docket Nos. 19-126 and 10-90, Public Notice, DA 20-1187 (rel. Oct. 13, 2020).

<sup>&</sup>lt;sup>14</sup> Auction Award PN at 1 (included as *Exhibit 1*).

<sup>&</sup>lt;sup>15</sup> See id., 1-2.

<sup>&</sup>lt;sup>16</sup> *See id.* 

support is expected to obtain an ETC designations (encompassing receipt of high-cost support) for the areas covered by its successful bids within 180 days after being announced as a winning bidder (*i.e.*, by June 7, 2021).<sup>17</sup>

## II. Federal Communications Act

Pursuant to section 214(e)(2) of the Act, a state commission may, upon its own motion,

or upon request, designate a common carrier to be an ETC for purposes of receiving universal

service support under the Act. Section 214(e)(2) also requires that designated ETCs comply with

the requirements of section 214(e)(1), which states:

A common carrier designated as an eligible telecommunications carrier . . . shall be eligible to receive universal service support in accordance with section 254 and shall, throughout the service area for which the designation is received -

(A) offer the services that are supported by the Federal universal service support mechanism under section 254(c), either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the service offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefore using media of general distribution.

Section 54.201(b) of the FCC's rules states that the state commission shall, on its own

motion or upon request, designate a common carrier as an ETC provided that the carrier meets the requirements of section 54.201(d), which restates the requirements found in section 214(e)(1) of the Act. Section 214(e)(2) of the Act and section 54.201(c) of the FCC's rules state that the state commission may, in the case of an area served by a rural telephone company – and shall, in the case of all other areas – designate more than one common carrier as an ETC for a service

<sup>&</sup>lt;sup>17</sup> See RDOF Order at ¶ 81. There is also provision for a waiver of this requirement if the bidder can demonstrate that it has engaged in good faith efforts to obtain the required ETC designation. See id. at n.230. As discussed herein, however, delay in the designation of a company that has been awarded high-cost support will delay the provision of voice and broadband services to customers in the targeted rural areas.

area the state commission designates, provided that each additional requesting carrier satisfies section 214(e)(1) of the Act and section 54.201(d) of the FCC's rules. Before designating an additional ETC for an area served by a rural telephone company, section 214(e)(2) of the Act says that the state commission shall find that such designation is in the public interest.

#### III. Description of Service Area

RDOF support is being awarded in census blocks. NextLink Internet therefore requests ETC designation for a service area that includes the census blocks in Minnesota where it has been awarded support. A list of these census blocks (with their associated exchanges) is provided in attached *Exhibit 4* along with a map of Minnesota identifying the exchange boundaries and the areas of the census blocks within those boundaries. In the RDOF Order, the FCC granted forbearance "from the statutory requirement that the ETC service area of [an RDOF] participant conform to the service area of the rural telephone company serving the same area."<sup>18</sup>

#### **IV.** NextLink Internet Satisfies the Requirements for ETC Designation

### A. NextLink Internet is a Common Carrier

As noted above, NextLink Internet holds FCC wireless licenses, on a common carrier basis, for the provision of fixed wireless services. The Company will utilize these existing (and additional) wireless licenses, as well as owned and leased fiber and other network assets to provide services in Minnesota. Moreover, NextLink Internet will provide supported services on

<sup>&</sup>lt;sup>18</sup> RDOF Order, ¶ 93; *see* Minnesota Administrative Rule 7811.1400, Subpart 3 ("A decision on a petition for designation to receive universal service support under this part must include a determination of the applicable universal service area. The applicable universal service area shall be the study area of the relevant LEC unless the commission and the FCC adopt a different service area."); *see also* Minnesota Administrative Rule 7812.1400, Subpart 3.

a common carrier basis, as defined in the Act and permitted by the FCC. Consequently, NextLink Internet is a common carrier.

## B. NextLink Internet Will Offer the Services That Are Supported by Federal Universal Service Support Mechanisms Throughout the Service Area for Which ETC Designation is Received

NextLink Internet commits to provide (i) voice grade access to the public switched telephone network (PSTN) or its functional equivalent; (ii) minutes of use for local service provided at no additional charge to end users; (iii) access to emergency services; and (iv) toll limitation services to qualifying low-income consumers as provided in accordance with 47 C.F.R. §§ 54.400 *et seq.* throughout the service area for which ETC designation is received.

## i. <u>Voice grade access to the public switched telephone network</u>

In the USF/ICC Transformation Order, the FCC modified the definition of a supported service to reflect a technologically neutral approach, enabling companies to provision voice service over any platform, including both the PSTN and IP networks.<sup>19</sup> Section 54.101 of the FCC's rules was amended to specify that the functionalities of eligible voice telephony services include voice grade access to the PSTN *or its functional equivalent*.<sup>20</sup> The FCC further explained that increasingly "consumers are obtaining voice services not through traditional means but instead through interconnected VoIP providers offering service over broadband

<sup>&</sup>lt;sup>19</sup> See Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing an Unified Intercarrier Compensation Regime; Federal State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund, WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, ¶ 78 (2011) (USF/ICC Transformation Order) ("The modified definition [of voice telephony service] simply shifts to a technologically neutral approach, allowing companies to provision voice service over any platform, including the PSTN and IP networks.").

<sup>&</sup>lt;sup>20</sup> *Id.*; *see also* 47 C.F.R. § 54.101(a) (emphasis added).

networks."<sup>21</sup> Interconnected VoIP services "allow customers to make real-time voice calls to, and receive calls from, the PSTN, and increasingly appear to be viewed by consumers as substitutes for traditional voice telephone services."<sup>22</sup> Thus, the FCC concluded that its authority to promote universal services in this context "does not depend on whether interconnected VoIP services are telecommunications services or information services under the Communications Act."<sup>23</sup> Consequently, NextLink Internet's plan to provide voice-grade access to the PSTN by providing interconnected VoIP service over its broadband networks throughout the designated service area is fully compliant with the FCC's universal service rules and orders.<sup>24</sup>

Currently, the Company provides an extensive range of service offerings for residential, business, and government customers, including broadband Internet access and VoIP, available at several price levels and upload/download speeds. NextLink Internet offers retail plans with download speeds of up to 100 Mbps in areas where the Company is offering (or will offer) service supported by CAF II support. In other areas, NextLink Internet offers retail plans with download speeds of up to 50 Mbps. In areas supported by RDOF funding, the Company expects to offer plans with download speeds up to 100 Mbps. A summary of NextLink Internet's current

<sup>&</sup>lt;sup>21</sup> USF/ICC Transformation Order, ¶ 63.

<sup>&</sup>lt;sup>22</sup> *Id.* 

<sup>&</sup>lt;sup>23</sup> *Id*.

<sup>&</sup>lt;sup>24</sup> The PUC has previously determined "that Minnesota providers using VoIP service are offering voice telephony services eligible for federal universal service support." See, e.g., Midcontinent Communications' Petition for Eligible Telecommunications Carrier Designation in Minnesota; Notice to Connect America Fund II Grant Winners, Docket Nos. P-6186/M-18-661, P-999/CI-18-634, Order Approving Request for ETC Status for High Cost Support in Certain Census Blocks, Document ID 20192-150118-02, at 5 (Feb. 8, 2019).

service offerings is provided in *Exhibit 5*. NextLink Internet anticipates that it will offer a similar selection of plans in the new service area supported by RDOF funding in Minnesota.<sup>25</sup>

#### ii. Minutes of Use for Local Service

High-cost support recipients must offer end users an amount of minutes prescribed by the FCC for local service (*i.e.*, exchange services) free of charge.<sup>26</sup> The FCC has not specified a minimum amount of local usage that a wireline ETC must offer. NextLink Internet will meet the local usage requirement by including unlimited local calling in its rate plans. The Company will comply with any minimum local usage requirements adopted in the future by the FCC or the PUC.

### iii. Access to emergency services

ETCs are required to provide access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911 (E911), to the extent the local government in an ETC's service area has implemented 911 or E911 systems.<sup>27</sup> Subject to the availability of requisite systems, NextLink Internet currently provides its VoIP customers with access to emergency services by providing 911 and E911 through arrangements with Voyant, a certified telecommunications carrier in Minnesota. Emergency calls from NextLink Internet customers are connected to Voyant's network via high speed Session Interface Protocol (SIP) trunks at NextLink Internet's datacenters. The SIP trunks are configured for High

<sup>&</sup>lt;sup>25</sup> Consistent with FCC requirements, NextLink Internet will include at least one standalone voice service offering throughout its territory. Additionally, the Company acknowledges that, as a designated ETC and a recipient of RDOF funding, it will be expected to make services available to low-income (Lifeline) customers in its territory. NextLink Internet will comply with all requirements applicable to these Lifeline services. See 47 C.F.R. § 54.400 et seq.

<sup>&</sup>lt;sup>26</sup> 47 C.F.R. § 54.101(a)(1).

<sup>&</sup>lt;sup>27</sup> 47 C.F.R. § 54.101(a)(1).

Availability IP to ensure maximum call processing effectiveness. As an ETC, the Company will continue to provide access to these critical services to customers throughout its service territory.

#### iv. Toll Limitation for Qualifying Low-Income Consumers

At this time, NextLink Internet does not distinguish between local exchange and long distance calls in its voice offering. Consequently, those NextLink Internet plans that include voice services do not apply any additional charge for interexchange calls. If, in the future, NextLink Internet offers a service plan that does distinguish between toll and non-toll calls – and which makes additional charges for toll calls possible – the Company will offer toll limitation service to qualifying low-income consumers at no additional charge.

# C. NextLink Internet Will Satisfy the "Own Facilities" Requirement for ETC Designation

NextLink Internet commits that, throughout its service area, it will comply with section 214(e)(1) of the Act and offer supported services "either using its own facilities or a combination of its own facilities and resale of another carrier's services." The Company provides its services using a combination of network facilities and technologies. Its last-mile voice and broadband services are provided using fiber (e.g., Ethernet and Gigabit Passive Optical Network or GPON) and fixed wireless microwave platforms. For its transport backbone, the Company relies upon point-to-point licensed wireless connections, dark fiber, and Ethernet. In Minnesota, NextLink Internet will deploy similar network arrangements to provide supported voice services and meet broadband requirements for RDOF support.

NextLink Internet deploys its facilities at existing third-party sites and leases space from local landowners to install additional network elements. NextLink Internet owns and operates approximately half of its "vertical assets" (e.g., towers, poles, and equivalents) and continues to expand, building 20 to 30 new towers each month. In the unserved/underserved areas in

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Minnesota for which the Company has been awarded funding, NextLink Internet anticipates that it will rely more substantially upon deployment of Company network facilities to develop local communications infrastructure.

The NextLink Internet network is designed to be highly scalable and replicable, with the goal of continued future expansion. As of the most recent upgrades, the Company's network currently has capacity to serve over 200,000 subscribers. NextLink Internet continues to evaluate new technologies to improve overall network performance and facilitate product enhancements.<sup>28</sup>

## D. NextLink Internet Will Advertise the Availability of its Services

NextLink Internet will advertise the availability of the supported services throughout its designated service areas using media of general distribution in a manner that is designed to reach those likely to qualify for such services. Communications channels have evolved to include significant alternatives to traditional print and broadcast media. Often, these newer channels are more effective at reaching potential customers.<sup>29</sup> NextLink Internet has successfully used

<sup>&</sup>lt;sup>28</sup> The FCC has recognized that CAF Phase II funding recipients will be subject to heightened deployment tracking measurements and has waived the historic high-cost ETC requirement for submission of a five-year network improvement plan. *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, WC Docket Nos. 09-197, 10-90, Public Notice, DA 18-714 (rel. Jul. 10, 2018). The same heightened deployment tracking measurements apply to the RDOF. NextLink Internet affirms that the high cost support will supplement the Company's ongoing expenditures towards expansion and improvement of its network. NextLink Internet is continually upgrading its core network and WAN infrastructure to position the Company for additional growth. Regardless of its other expenditures on expansion and network improvement, however, NextLink Internet specifically commits that it will use any high cost USF support that it receives for operations in Minnesota to maintain and improve service within Minnesota.

<sup>&</sup>lt;sup>29</sup> The FCC has recognized this transition for advertising to Lifeline eligible customers as well. *See Lifeline and Link Up Reform and Modernization, et al.*, WC Docket No. 11-42, et al., Third Report and Order, Further Report and Order, and Order on Reconsideration, FCC 16-

various social media platforms as well as Google AdWords among other strategies. The Company also has utilized direct mailing and limited print, billboard, radio, and video media platforms, albeit less frequently (and to less discernible effect). NextLink Internet agrees to comply with all form and content requirements that are promulgated by the FCC or the PUC, currently or in the future, and required of all similarly designated ETCs. A sample copy of NextLink Internet advertising material is attached as *Exhibit 6*.

#### E. Consumer Protection and Service Quality Standards

In its over seven-year history of providing service, NextLink Internet has consistently prioritized customer service. The Company considers service quality and compliance with consumer protection standards as integral to its operations. Consequently, while NextLink Internet hears from customers with questions or concerns (as does every provider), the Company has not been the subject of any serious consumer complaints or investigations. At this time, NextLink Internet complies with all state and federal consumer protection requirements applicable to its current operations. Upon designation as an ETC in Minnesota, NextLink Internet will comply with applicable consumer protection and service quality standards, as set forth by the FCC and PUC. In particular, this will include compliance with all state and federal privacy standards, including the FCC's Customer Proprietary Network Information (CPNI) rules and the network performance disclosure requirements of 47 C.F.R. § 8.1.

#### F. Emergency Situation Functionality

The Company's network is designed to remain operative in emergency situations and to ensure continued service to customers. First, the network has been developed and continues to

<sup>38, ¶¶ 362-365 (</sup>rel. Apr. 27, 2016); *Lifeline and Link-Up*, WC Docket No. 03-109, Report and Order and Further Notice of Proposed Rulemaking, FCC 04-87, ¶ 46 (rel. Apr. 29, 2004) (including in its guidelines that carriers may post outreach material on the Internet).

be expanded utilizing state-of-the-art industry standard equipment and software. This ensures infrastructure durability to continue operations even under major stress events. Moreover, recognizing that no network is absolutely protected against adverse events, NextLink Internet has designed its network to provide for continued services even if one or more elements within the network temporarily fail. Throughout the layers of the Company's network, connections and transport resources are designed with redundancy to provide immediately available back-ups in the event of power cuts or other events. NextLink Internet employs a dual data center model with duplication and load sharing as well as uninterrupted power supply (UPS) and generator backups. All point-of-presence (POP) locations will have failover power ability along with wireless re-route backhaul ability and multiple routing options within each WAN/fiber POP tower location. Within the data center are multiple network-to-network interfaces (NNIs) with Tier 1 Internet Service Providers (ISPs) supporting full border gateway protocol (BGP) routing to each ISP to ensure uninterrupted uptime for subscribers.

# G. NextLink Internet Will Comply With all Applicable Minnesota and FCC Reporting, Remittance, and Other Regulatory Obligations

NextLink Internet will comply with all applicable Minnesota and FCC requirements with respect to fees, charges, and reports. The Company will timely pay all applicable federal, state, and local regulatory fees, including universal service and E911 fees. Furthermore, NextLink Internet will comply with the ongoing reporting requirements for ETCs as set forth, and revised from time to time, by the PUC and the FCC. Additionally, NextLink Internet commits to respond to the PUC's requests for information. NextLink Internet also will comply fully with measures adopted by the FCC and the PUC to prevent waste, fraud, and abuse within the USF. Moreover, in the event that NextLink Internet determines to cease operations as an ETC, the Company will comply with the applicable relinquishment protocols of the FCC and the PUC.

## V. Designation of NextLink Internet as an ETC is in the Public Interest

Designation of NextLink Internet as an ETC in Minnesota will serve the public interest by facilitating the goal of deploying voice and high-speed broadband networks in unserved and underserved rural, high-cost areas. As a recipient of federal high-cost funding, the Company will deploy advanced communications to unserved and underserved areas in Minnesota. Moreover, NextLink Internet will be the *only* provider in its proposed service area that is approved to draw on federal RDOF support for the development and deployment of this essential communications infrastructure. Consequently, designating the Company as an ETC directly benefits the residents of the proposed area by ensuring that they receive the benefits of this federal funding.

Expedited designation of NextLink Internet will serve the public interest by ensuring that the Company is eligible to receive federal high cost USF support and deploy critical communications facilities as soon as possible. NextLink Internet will use this funding to advance directly the FCC's goal of deploying voice and high-speed broadband-capable networks in rural, high-cost areas while ensuring that rural consumers and anchor institutions benefit from innovations in communications technology. In particular, NextLink Internet will use federal USF support to expand access to high-speed, high-quality broadband and voice provided through interconnected VoIP for residents of rural Minnesota. These advanced communications services will provide important connectivity to consumers, businesses, and community anchor institutions, including rural schools, libraries, and medical facilities.

NextLink Internet has successfully grown its operations in Texas over the past seven years and has used CAF II support over the past two years to expand its communications infrastructure and service offerings in all six states where it operates. Once designated as an ETC, the Company will be able to use funding received through the RDOF to effectively deploy

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the Company's high-speed broadband and voice-enabled networks for the benefit of the residents, businesses, and community anchor institutions in rural areas of Minnesota.

## VI. Conclusion

For the reasons set forth above, NextLink Internet respectfully requests that the PUC (i) expeditiously review and approve this Application; (ii) issue an Order designating the Company as an ETC in Minnesota for the specific purpose of receiving federal high cost and low-income funding; and (iii) grant such other relief as the PUC deems to be appropriate.

Respectfully submitted,

/s/ Joshua T. Guyan Joshua T. Guyan Chris M. Laughlin Kelley Drye & Warren LLP 3050 K Street, NW, Suite 400 Washington, D.C. 20007 Tel: (202) 342-8566 jguyan@kelleydrye.com claughlin@kelleydrye.com

Counsel for AMG Technology Investment Group, LLC d/b/a NextLink Internet

January 6, 2021

#### VERIFICATION

## STATE OF TEXAS § COUNTY OF PARKER §

I, Eric Pyland, state that I am the Chief Financial Officer of AMG Technology Investment Group, LLC d/b/a NextLink Internet (NextLink Internet); that I am authorized to make this Verification on behalf of NextLink Internet; that I have read the foregoing document; and that the statements in the foregoing document, except as otherwise specifically attributed, are true and correct to the best of my knowledge, information and belief.

I declare under penalty of perjury that the foregoing is true and correct.

SiPCO

Subscribed and sworn to before me this  $28^{+1}$  day of December, 2020.

mille Notary Publie

17-2023 My Commission expires: 04-

STACHIA DANIELLA JORDAN Notary Public, State of Texas Comm. Expires 04-17-2023 Notary ID 131978001

## **CERTIFICATE OF SERVICE**

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Application of AMG Technology Investment Group, LLC d/b/a NextLink Internet for Designation as an Eligible Telecommunications Carrier for the Purpose of Providing Services Supported by the FCC's Rural Digital Opportunity Fund

Docket No.

I hereby certify that on January 6, 2021, I caused the foregoing Application of AMG Technology Investment Group, LLC d/b/a NextLink Internet for Designation as an Eligible Telecommunications Carrier to be served via eService, electronic mail, or postage prepaid United States first class mail, to the following:

Will Seuffert Executive Secretary Minnesota Public Utilities Commission

Linda Chavez Minnesota Department of Commerce

Office of the Attorney General – Residential Utilities Division

/s/ Winafred Brantl Winafred Brantl Kelley Drye & Warren LLP 3050 K Street, NW, Suite 400 Washington, DC 20007-5108 Telephone: (202) 342-8400

## **EXHIBITS**

Exhibit 1	Federal Communications Commission Notice of RDOF Awards	
Exhibit 2	Management Team	
Exhibit 3	Minnesota Secretary of State Certificates	
Exhibit 4	<ul> <li>Description of Proposed Service Area:</li> <li>List of Census Blocks and Associated Exchanges</li> <li>Service Area Maps with Census Blocks and Exchange Boundaries</li> </ul>	
Exhibit 5	Service Plans	
Exhibit 6	Sample Advertising Material	

## Exhibit 1

FCC Public Notice of RDOF Awards<sup>1</sup> (December 7, 2020)

<sup>&</sup>lt;sup>1</sup> Attachment C (Instructions for the FCC Form 683 "long-form" application) has been omitted.



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> DA 20-1422 December 7, 2020

## RURAL DIGITAL OPPORTUNITY FUND PHASE I AUCTION (AUCTION 904) CLOSES

## WINNING BIDDERS ANNOUNCED

## FCC FORM 683 DUE JANUARY 29, 2021

## AU Docket No. 20-34 WC Docket 19-126 WC Docket No. 10-90

1. By this Public Notice, the Rural Broadband Auctions Task Force, Office of Economics and Analytics (OEA), and Wireline Competition Bureau (WCB) announce that bidding in the Rural Digital Opportunity Fund Phase I auction (Auction 904) concluded on November 25, 2020. There were 180 winning bidders in the auction, with the 10-year support amount totaling \$9.23 billion and covering 5,220,833 locations in 49 states and one territory. Of the 5,295,771 locations in the 61,766 eligible census block groups, approximately 99% of the locations are covered by winning bids. While winning bids are for a range of performance tiers, winning bids for downstream speeds of at least 100 megabits per second (Mbps) cover 99.7% of these locations, with over 85% of locations covered by winning bids for Gigabit speed service.

2. Winning bidders are required to submit a post-auction application for support (FCC Form 683) no later than **January 29, 2021**. Winning bidders that wish to assign some or all of their winning bids to related entities must do so by **December 22, 2020**, using the Divide Winning Bids process described below.

#### I. WINNING BIDDERS

3. This Public Notice summarizes the results of the auction and provides winning bidders with important information, including FCC Form 683 filing requirements and support disbursement matters. Key information appears in the following attachments:

Attachment A: "Winning Bidders Summary" lists for each bidder: the state, the 10-year assigned support amount, and the number of locations assigned in winning bids.

**Attachment B:** "State Results Summary" lists for each state with eligible areas in Auction 904: the total 10-year assigned support, the number of locations assigned, and the number of bidders with winning bids.

Attachment C: "FCC Form 683: Application for Rural Digital Opportunity Fund Phase I Support – Instructions."

4. A copy of this Public Notice will be sent to each qualified bidder via overnight delivery to the contact person at the contact address listed in each qualified bidder's short-form application (FCC Form 183).

#### II. AUCTION RESULTS

5. Concurrent with the release of this Public Notice, the Commission is making available the detailed auction results and bidding information described below.

Online Map:	An interactive visual representation of the auction results is available on the Auction 904 web page ( <u>www.fcc.gov/auction/904</u> ). On the interactive map available at this webpage, there are options for displaying all eligible areas and non-winning bids. Clicking on a state or winning bid listed on the right-hand side of the map will zoom the map to that area.
Results Data:	An online viewer of results data and downloadable files that include the identities of bidders and all their submitted bids are now available in the FCC Auctions Public Reporting System (auctiondata.fcc.gov), for which there is a link on the Results tab on the Auction 904 web page (www.fcc.gov/auction/904). <sup>1</sup>

6. Additionally, the Commission will soon make available certain, previously withheld information submitted in the applications to participate in the auction (FCC Forms 183). This information includes the state(s) and performance tier and latency combination(s) for which each applicant was found to be eligible.<sup>2</sup> The applications are viewable through the application search feature, which can be accessed through the Application Search tab on the Auction 904 web page.

## III. POST-AUCTION PROCEDURES

7. Under the competitive bidding rules adopted in the *Rural Digital Opportunity Fund Order*, Auction 904 winning bidders must file a post-auction application for support, also referred to as FCC Form 683, consistent with all requirements of the long-form application process.<sup>3</sup> FCC Form 683 has two discrete parts—the Divide Winning Bids portion and the long-form application portion. Each winning bidder is required to file an FCC Form 683 to become authorized to receive support. Prior to completing the long-form application portion, a winning bidder may divide its winning bids by assigning them to related entities, as described below.<sup>4</sup> If a winning bidder assigns its winning bids to related

<sup>3</sup> 47 CFR § 1.21004; *Rural Digital Opportunity Fund et al.*, WC Docket No. 19-126 et al., Report and Order, 35 FCC Rcd 686, 696, para. 22 (2020) (*Rural Digital Opportunity Fund Order*).

<sup>&</sup>lt;sup>1</sup> Because bids in Auction 904 implied annual support amounts, the bids and results data in the FCC Auctions Public Reporting System are on an annual basis, in contrast to the 10-year total support amounts reported in Attachments A and B.

<sup>&</sup>lt;sup>2</sup> We will continue to withhold from routine public inspection responses to the technical questions in Appendix A of the *Auction 904 Procedures Public Notice* and any supporting information; financial information for which confidential treatment was requested under the section 0.459(a)(4) abbreviated confidential treatment process; and any other information subject to a request for confidential treatment that has been granted or remains pending. *See Rural Digital Opportunity Fund Phase I Auction Scheduled for October 29, 2020; Notice and Filing Requirements and Other Procedures for Auction 904*, AU Docket No. 20-34 et al., Public Notice, 35 FCC Red 6077, 6129-30, para. 141 (2020) (*Auction 904 Procedures Public Notice*). Further, to prevent possible public dissemination of information related to bids or bidding strategies in Auction 107—an auction for flexible-use service licenses in the 3.7 GHz Band in which bidding is scheduled to commence on December 8—the data fields in which applicants identified specific spectrum bands that they proposed to use and spectrum access attachments will continue to be withheld from routine public inspection until the prohibition of certain communications in Auction 107 concludes. *See* 47 CFR 1.2105 (c); *Auction of Flexible-Use Service Licenses in the 3.7–3.98 GHz Band for Next-Generation Wireless Services; Notice and Filing Requirements, Minimum Opening Bids, Upfront Payments, and Other Procedures for Auction 107; Bidding in Auction 107 Scheduled to Begin December 8, 2020*, AU Docket No. 20-25, Public Notice, 35 FCC Red 8404, 8418, para. 44 (2020).

<sup>&</sup>lt;sup>4</sup> Auction 904 Procedures Public Notice, 35 FCC Rcd at 6164-65, paras. 288-93.

entities, those entities will be required to file the long-form application portion of an FCC Form 683 for those winning bids, as described below. A winning bidder will be responsible for completing the long-form application portion of FCC Form 683 for any winning bids that it does not assign to a related entity.

8. Winning bidders that intend to file a long-form application covering all their winning bids are not required to participate in the Divide Winning Bids process. Any winning bidder that does not submit the Divide Winning Bids portion of FCC Form 683 prior to 6:00 p.m. ET on December 22, 2020, must file a long-form application that covers *all* its winning bids. In such circumstances, the winning bidder must file the long-form application in its own name, be designated as the eligible telecommunications carrier (ETC) to serve the relevant areas, be named in the requisite letter(s) of credit, and fulfill the public interest obligations associated with receiving Rural Digital Opportunity Fund Phase I support.<sup>5</sup>

## A. Divide Winning Bids Portion of FCC Form 683

9. Any winning bidder that intends to assign some or all its winning bids to related entities must do so by submitting the Divide Winning Bids portion of the FCC Form 683 during the Divide Winning Bids filing window. The Divide Winning Bids filing window will open at 10:00 a.m. Eastern Time (ET) on Wednesday, December 9, 2020, and close at 6:00 p.m. ET on Tuesday, December 22, 2020. During this period, a winning bidder will be able to log into the Auction Application System using the FCC Registration Number (FRN) that it used to file its short-form application and complete the Divide Winning Bids portion of FCC Form 683. The instructions in Attachment C explain how a winning bidder can assign its winning bids to related entities.

10. A winning bidder may only assign its winning bids to a related entity that is named in its short-form application or that was formed after the short-form application deadline (i.e., July 15, 2020).<sup>6</sup> The Auction Application System will not permit a winning bidder to assign its winning bids to another winning bidder. A related entity is an entity that is controlled by the winning bidder or is a member of (or an entity controlled by a member of) a consortium/joint venture of which the winning bidder is a member.<sup>7</sup> Thus, if a holding company/parent company is a winning bidder in Auction 904, the winning bidder may designate one or more operating companies that it controls to complete the long-form application to receive Rural Digital Opportunity Fund support for some or all of the winning bids in a state. If a consortium/joint venture is a winning bidder in Auction 904, the entity may designate one or more members (or entities controlled by members of) the consortium/joint venture to complete the long-form application to Rural Digital Opportunity Fund support for some or all of the winning bids in a state.

11. A winning bidder may assign winning bids to more than one entity in a single state, but it cannot assign a single winning bid to more than one entity.<sup>8</sup> Thus, a winning bidder may not split among multiple entities either: 1) eligible census blocks within a winning bid for an individual census block group, or 2) separate census block groups within a winning package bid.<sup>9</sup>

<sup>8</sup> *Id.* at 6164, para. 290.

<sup>&</sup>lt;sup>5</sup> Subject to the limited exception described below for multiple operating companies operating in a state.

<sup>&</sup>lt;sup>6</sup> Auction 904 Procedures Public Notice, 35 FCC Rcd at 6165, para. 291.

<sup>&</sup>lt;sup>7</sup> *Id.* at 6164, para. 289.

<sup>&</sup>lt;sup>9</sup> For example, assume a winning bidder has three winning bids—package bid A, package bid B, and single bid (i.e., one census block group) C. The winning bidder could assign package bid A to one related entity, package bid B to another related entity, and single bid C to a third entity. The winning bidder could not assign some census block groups from package bid A to one related entity and then the remaining census block groups from package bid A to another entity. The entire package bid must be assigned to one related entity. Similarly, the winning bidder could not assign some eligible census blocks from single bid C to one entity and then the remaining eligible census blocks from single bid C to one entity. The entire census block group covered by the single winning bid must be assigned to one related entity.

12. Each entity that is assigned a winning bid through the Divide Winning Bids process is the entity that must file the long-form application portion of FCC Form 683 in its own name. Except for one limited exception, that long-form applicant must be designated as the eligible telecommunications carrier to serve the relevant area(s), be named in the requisite letter(s) of credit, and fulfill the public interest obligations associated with receiving Rural Digital Opportunity Fund support.<sup>10</sup>

13. For administrative convenience, if a winning bidder is a holding/parent company that has multiple operating companies in a state and intends to assign its winning bids to multiple operating companies in a state, it may choose one of those entities to be the lead operating company.<sup>11</sup> In such circumstances, the winning bids should be assigned to that lead operating company, the long-form application should be filed in the name of the lead operating company, the letter of credit should be in the name of the lead operating company, the letter of credit should be in the name of the lead operating company. However, the long-form application must identify which operating companies will meet the public interest obligations for which census block groups and documentation must be submitted that demonstrates that each of the operating companies has an ETC designation covering the relevant census block groups. As decided in the *Rural Digital Opportunity Fund Order*, compliance with the service milestones will be determined on a statewide basis across all the relevant operating companies.<sup>12</sup>

14. A winning bidder that assigns some or all its winning bids to a related entity must make several certifications in the Divide Winning Bids portion of FCC Form 683. In particular, it must certify and acknowledge that it:

- has assigned the winning bids to related entities that were named in the short-form application or are newly formed,
- will inform each entity of its filing obligation and cause each entity to submit a timely FCC Form 683 long-form application,
- will be at risk for default if any of the related entities do not submit a timely FCC Form 683 long-form application, and
- will submit a timely FCC Form 683 long-form application for any of the winning bids that it did not assign to another entity.

# B. Obligation to Apply for Support – Long-Form Application Portion of FCC Form 683

15. A winning bidder that retains any of its bids, as well as all entities that are assigned winning bids by a winning bidder, must electronically submit the long-form application portion of FCC Form 683 covering those bids prior to the close of the long-form application filing window. The long-form application filing window will open at 10:00 a.m. ET on Thursday, January 14, 2021, and will close at 6:00 p.m. ET on Friday, January 29, 2021. Certain additional information may be submitted to the Commission after this filing window closes, as described below. The Auction Application System will open a filing window at 10:00 a.m. ET on Thursday, January 14, 2021 to permit applicants to submit this additional information by the relevant deadlines.

## 1. Deadlines

16. Attachment C of this Public Notice provides instructions for completing the long-form application portion of FCC Form 683. These instructions are consistent with the Commission's

<sup>&</sup>lt;sup>10</sup> Auction 904 Procedures Public Notice, 35 FCC Rcd at 6165, para. 291.

<sup>&</sup>lt;sup>11</sup> Id. at 6165, para. 292.

<sup>&</sup>lt;sup>12</sup> Rural Digital Opportunity Fund Order, 35 FCC Rcd at 712, para. 54.

requirements fully described in section 54.804(b) & (c) of the Commission's rules and paragraphs 286 to 322 of the *Auction 904 Procedures Public Notice*.<sup>13</sup> Below is a summary of the information that must be submitted by the applicable application deadlines:<sup>14</sup>

- Information due prior to 6:00 p.m. ET on Friday, January 29, 2021:
  - **Applicant information**, including legal classification (e.g., corporation, general partnership, etc.), jurisdiction of formation, address, contact information, and responsible individual
  - Whether the applicant has already been designated as an eligible telecommunications carrier (ETC) for all the eligible census blocks in a winning bid(s)<sup>15</sup>
    - If the applicant has already obtained a high-cost ETC designation that covers all the relevant areas in a state, it should submit the required ETC documentation and certification letter by this deadline so that Commission staff can expeditiously verify the applicant's ETC status in the state
    - If the applicant has obtained a high-cost ETC designation for only some of the relevant areas in a state, Commission staff will not verify the applicant's ETC status in a state until the applicant has submitted the required documentation and certification letter for *all* the relevant areas in the state
  - Whether the applicant is required to submit audited financial statements during the long-form application process and whether it seeks confidential treatment of those financial statements<sup>16</sup>
  - **Initial project overview(s)** describing at a high-level the applicant's intended technology and system design for each state with a winning bid.<sup>17</sup> An applicant should not include any confidential trade secrets or commercial information in its overview(s), which will be made publicly available.
  - **Project funding description(s)** that explains how necessary construction will be funded in each state<sup>18</sup>
  - **Spectrum access description(s)** demonstrating that the applicant has sufficient access to spectrum in each state, if applicable<sup>19</sup>

<sup>&</sup>lt;sup>13</sup> 47 CFR § 54.804(b), (c); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6163-78, paras. 286-322; *see also Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 725-735, paras. 86-113.

<sup>&</sup>lt;sup>14</sup> As discussed in Attachment C, certain applicant information may be automatically transferred from a winning bidder's short-form application (FCC Form 183) to its long-form application (FCC Form 683).

<sup>&</sup>lt;sup>15</sup> By June 7, 2021, the long-form applicant must obtain from all the relevant states or the Commission a high-cost ETC designation(s) that cover its winning bid areas and upload the required documentation and a certification letter to its FCC Form 683. 47 CFR § 54.804(b)(5); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6176, para. 316; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 727-28, para. 92.

<sup>&</sup>lt;sup>16</sup> As noted below, the audited financial statements are due by June 7, 2021. 47 CFR § 54.804(b)(4); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6177, para. 318; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 722, para. 80.

<sup>&</sup>lt;sup>17</sup> Auction 904 Procedures Public Notice, 35 FCC Rcd at 6167, para. 302.

<sup>&</sup>lt;sup>18</sup> 47 CFR § 54.804(b)(2)(vi); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6174-75, para. 312; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 727, para. 91.

<sup>&</sup>lt;sup>19</sup> Auction 904 Procedures Public Notice, 35 FCC Rcd at 6175, paras. 313-14.

- **Agreement information**, including information regarding any agreements relating to the applicant's participation in Auction 904<sup>20</sup>
- **Ownership information**, including information regarding entities that have an ownership or other interest in the applicant and associated Commission-regulated businesses<sup>21</sup>
- **Various certifications,** including certifications regarding the applicant's compliance with statutory and regulatory requirements; financial and technical qualifications; available funds; compliance with the relevant public interest obligations and ETC requirements; and spectrum access, if applicable<sup>22</sup>

17. We adopt a deadline of 70 days from the release of this Public Notice for long-form applicants to submit letter of credit commitment letters, as well as detailed technology and system design descriptions.<sup>23</sup>

- Information due prior to 6:00 p.m. ET on Monday, February 15, 2021:
  - Letter of credit commitment letter(s) for each applicable state from a qualified bank committing to issue an irrevocable stand-by letter of credit to the long-form applicant in the required form that covers the first year of support (at a minimum).<sup>24</sup> A long-form applicant with winning bids in multiple states may submit a single commitment letter that covers all of the relevant states as long as it is clear that the letter is applicable to the relevant states.
    - At a minimum, the letter must provide the dollar amount of the letter of credit and the issuing bank's agreement to follow the terms and conditions of the Commission's model letter of credit in Appendix C of the *Rural Digital Opportunity Fund Order*.<sup>25</sup>
    - The bank eligibility requirements are described in detail in paragraph 107 of the *Rural Digital Opportunity Fund Order* and section 54.804(c) of the Commission's rules.<sup>26</sup>
  - **Detailed technology and system design description(s)** for the approved technology for each applicable state, including a network diagram certified by a professional engineer.
    - Paragraphs 301 to 311 of the Auction 904 Procedures Public Notice provide detailed guidance on how an applicant can successfully meet this requirement.<sup>27</sup>

<sup>21</sup> 47 CFR §§ 1.2112(a), 54.804(b)(2)(i); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6165, para. 295; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 726, para. 87.

<sup>22</sup> See, e.g., 47 CFR § 54.804(b)(2)(ii), (iii), (v), (vii); Auction 904 Procedures Public Notice, 35 FCC Rcd at 6165-67, 6174-75, 6175-76, paras. 296-300, 312, 314.

<sup>23</sup> Auction 904 Procedures Public Notice, 35 FCC Rcd at 6167, 6176, paras. 303, 315 (stating that this information would be due "[w]ithin the specified number of days after the release of the Auction 904 closing public notice").

<sup>24</sup> 47 CFR § 54.804(b)(3), (c)(2); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6176, para. 315; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 732, para. 106.

<sup>25</sup> Auction 904 Procedures Public Notice, 35 FCC Rcd at 6176, para. 315; Rural Digital Opportunity Fund Order, 35 FCC Rcd at 732, para. 106.

<sup>26</sup> 47 CFR § 54.804(c)(2); Rural Digital Opportunity Fund Order, 35 FCC Rcd at 732, para. 107.

<sup>27</sup> 47 CFR § 54.804(b)(2)(iv); Auction 904 Procedures Public Notice, 35 FCC Rcd at 6167-74, paras. 301-11; Rural Digital Opportunity Fund Order, 35 FCC Rcd at 726, para. 90

<sup>&</sup>lt;sup>20</sup> Id. at 6138, para. 173.

Further educational materials regarding this requirement will also be made available on the Auction 904 website, <u>www.fcc.gov/auction/904</u>.

- The professional engineer must certify that he or she has reviewed each state network diagram and that the network is capable of delivering, to at least 95% of the required number of locations in each relevant state, voice and broadband service that meets the requisite performance requirements.<sup>28</sup> For purposes of this requirement, while it is not necessary that the professional engineer certifying the network diagram have a Professional Engineer license, the certification should describe the professional engineer's qualifications such that the certifier's network design and performance expertise is apparent.
- Wireless coverage maps should be submitted in ESRI Shapefile format. The component files (including the .SHP, .SHX, .DBF, and .PRJ files) should be uploaded in a single compressed .ZIP archive. Recommended standards and data fields will be made available on the Auction 904 website,
   www.fcc.gov/auction/904. Long-form applicants will see an error message when they upload the .ZIP archive to the long-form application, but the error will not prevent long-form applicants from submitting their applications provided that the submission occurs prior to the deadline and Commission staff should still be able to access the file. Commission staff will contact a long-form applicant after the filing deadline if there are any issues with the file. The FCC Form 683 attachment size limit is 10 MB.
- Information due prior to 6:00 p.m. ET on Monday, June 7, 2021:
  - Documentation of high-cost ETC designation(s) in all areas where the applicant will receive support, as described in paragraphs 316-317 of the *Auction 904 Procedures Public Notice*.<sup>29</sup> An applicant should also upload a .csv file of the census blocks that are covered by the ETC designation order.
  - **ETC certification letter(s)** from an officer of the applicant certifying that the long-form applicant's ETC designation(s) covers all the areas where the applicant will receive support.<sup>30</sup>
  - If not provided with the FCC Form 183 short-form application by the long-form applicant or a related entity,<sup>31</sup> **financial statements from the prior fiscal year (i.e., 2019) that have been audited by an independent certified public accountant**, including the balance sheets, statements of net income and cash flow, along with an opinion letter from an independent certified public accountant and the accompanying notes.<sup>32</sup> An applicant

<sup>&</sup>lt;sup>28</sup> 47 CFR § 54.804(b)(2)(iv); Auction 904 Procedures Public Notice, 35 FCC Rcd at 6167, para. 301; Rural Digital Opportunity Fund Order, 35 FCC Rcd at 726, para. 90. Note that all performance requirements for broadband and voice services have to be met at peak periods. See Connect America Fund, WC Docket No. 10-90, Order, 33 FCC Rcd 6509, 6517-21, paras. 22-33 (WCB/WTB/OET 2018) (CAF Performance Measures Order); Connect America Fund, WC Docket No. 10-90, Order on Reconsideration, 34 FCC Rcd 10109, 10116-10118, paras. 20-23 (2019) (CAF Performance Measures Second Reconsideration Order).

<sup>&</sup>lt;sup>29</sup> 47 CFR § 54.804(b)(5); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6176, paras. 316-17; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 727-28, para. 92.

<sup>&</sup>lt;sup>30</sup> 47 CFR § 54.804(b)(5); *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6176, para. 316; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 727-28, para. 92.

<sup>&</sup>lt;sup>31</sup> In this context, a related entity means the long-form applicant's parent/holding company or, if the long-form applicant is a member of a consortium or joint venture, the member of the consortium or joint venture that submitted financial statements with the short-form application.

can also submit fiscal year-end 2020 audited financial statements instead if they are available.

- The applicant must submit the audited financial statements of the entity that submitted its unaudited financial statements in the relevant FCC Form 183 short-form application or its own audited financial statements.<sup>33</sup>
- Any applicant that fails to submit the audited financial statements as required by this deadline will be subject to a base forfeiture of \$50,000, which will be subject to adjustment upward or downward as appropriate based on criteria set forth in the Commission's forfeiture guidelines.<sup>34</sup>

18. Timely submitted applications will be reviewed by Commission staff for completeness and compliance with the Commission's rules and to determine if the long-form applicant has demonstrated that it is technically and financially qualified to fulfill its Rural Digital Opportunity Fund public interest obligations if authorized to receive support. Commission staff will notify a long-form applicant if additional information is required. We expect long-form applicants to expeditiously complete their applications and respond in a timely manner to staff requests for additional or missing information.<sup>35</sup> If the application and the information with respect to each winning bid in a particular state is complete and the long-form applicant has demonstrated that it is technically and financially qualified, WCB will release a public notice identifying the applicant and the winning bids for which the Commission is ready to authorize Rural Digital Opportunity Fund support.<sup>36</sup> If a long-form applicant ultimately fails to provide all the required information or demonstrate that it is technically and financially qualified, WCB will release a public notice identifying the applicant and the winning bids that are considered in default.<sup>37</sup>

- The applicant will have 10 business days from the release of the public notice indicating that the Commission is ready to authorize support to submit:
  - **Irrevocable standby letter of credit** for each state where the long-form applicant will be authorized to receive support. Long-form applicants should carefully review the letter of

<sup>33</sup> Accordingly, if the long-form applicant is a member of a consortium, it should submit the audited financial statements of the consortium member that submitted its unaudited financial statements in FCC Form 183. If the long-form applicant is an operating company of a holding company that filed an FCC Form 183 on behalf of the long-form applicant, the long-form applicant should submit the audited financial statements of the holding company. A long-form applicant also has the option of submitting its own audited financial statements instead.

<sup>34</sup> Auction 904 Procedures Public Notice, 35 FCC Rcd at 6177, para. 318; Rural Digital Opportunity Fund Order, 35 FCC Rcd at 722, para. 80; 47 U.S.C. § 503(b)(2)(B); 47 CFR § 1.80(b)(8), note to paragraph (b)(8).

<sup>35</sup> See 47 CFR § 1.21004(b) ("The Commission may dismiss a winning bidder's application with prejudice for failure of the winning bidder to prosecute, failure of the winning bidder to respond substantially within the time period specified in official correspondence or requests for additional information, or failure of the winning bidder to comply with requirements for becoming authorized to receive support. A winning bidder whose application is dismissed for failure to prosecute pursuant to this paragraph has defaulted on its bid(s)."); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 696, para. 22 (noting "the Commission will apply as appropriate any modifications to [the general competitive bidding rules] that it may adopt").

<sup>36</sup> 47 CFR § 54.804(b)(6)(v).

<sup>37</sup> A long-form applicant that defaults on a winning bid in a state may still be authorized to receive support for its remaining winning bids in that state.

<sup>(</sup>Continued from previous page) -

<sup>&</sup>lt;sup>32</sup> 47 CFR § 54.804(b)(4); Auction 904 Procedures Public Notice, 35 FCC Rcd at 6177, para. 318; Rural Digital Opportunity Fund Order, 35 FCC Rcd at 722, para. 80.

credit requirements in section 54.804(c) of the Commission's rules and in the *Rural Digital Opportunity Fund Auction Order*,<sup>38</sup> which are summarized below:

- The initial letter of credit must cover the first year of support for the state, at a minimum.<sup>39</sup>
- The letter(s) of credit must be issued in substantially the same form as set forth in the model letter of credit provided in Appendix C of the *Rural Digital Opportunity Fund Order*.<sup>40</sup>
- The long-form applicant must be the entity that is named in the letter(s) of credit.<sup>41</sup>
- The letter(s) of credit must be issued by a qualified bank. The issuing bank eligibility requirements are described in section 54.804(c)(2) of the Commission's rules and in paragraph 107 of the *Rural Digital Opportunity Fund Order*.<sup>42</sup>
- Before a support recipient can receive its next year's support and each year's support thereafter, it must modify, renew, or obtain a new letter of credit to ensure that its value is consistent with the Commission's rules. The value of the letter of credit must increase each year until it has been verified that the support recipient has met certain service milestones as described in more detail in section 54.804(c)(1) of the Commission's rules.<sup>43</sup>
- The letter of credit must remain open until the support recipient has certified that it offers the required service to 100% of the Connect America Cost Model (CAM)-determined location total in the state by the end of year six (or WCB's adjusted CAM location count if there are fewer locations) and the Universal Service Administrative Company (USAC) has verified that the build out obligation has been fulfilled.<sup>44</sup>
- A list of common letter of credit errors is available at <u>https://www.fcc.gov/file/18256/download</u>.

<sup>44</sup> 47 CFR § 54.804(c)(1); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 731, para. 103. *See also Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 709-12, paras. 45-55 (describing the service milestones and WCB's recalculation of location totals). More information about USAC's verification process is available at: <a href="https://www.usac.org/high-cost/resources/fund-verification-reviews/">https://www.usac.org/high-cost/resources/fund-verification-reviews/</a>.

<sup>&</sup>lt;sup>38</sup> 47 CFR § 54.804(c); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 729-35, 773-77, paras. 96-113, Appx. C.

<sup>&</sup>lt;sup>39</sup> 47 CFR § 54.804(c)(1); Rural Digital Opportunity Fund Order, 35 FCC Rcd at 732, para. 107.

<sup>&</sup>lt;sup>40</sup> Rural Digital Opportunity Fund Order, 35 FCC Rcd at 773-77, Appx. C.

<sup>&</sup>lt;sup>41</sup> Auction 904 Procedures Public Notice, 35 FCC Rcd at 6164, para. 291.

<sup>&</sup>lt;sup>42</sup> 47 CFR § 54.804(c)(2); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 732-33, para. 107. WCB also issued guidance announcing that a non-U.S. bank that has a branch office located in New York City and that will accept a letter of credit draw certificate from USAC via overnight courier, in addition to in-person presentations, will be considered qualified to issue letters of credit if the bank also meets the Commission's other non-U.S. bank eligibility requirements. *Wireline Competition Bureau Provides Guidance Regarding the Eligibility of Non-United States Banks Issuing Letters of Credit for Universal Service Competitive Bidding Mechanisms*, WC Docket No. 19-126 et al., Public Notice, 35 FCC Rcd 2804 (WCB 2020).

<sup>&</sup>lt;sup>43</sup> 47 CFR § 54.804(c)(1)(i)-(vii); Rural Digital Opportunity Fund Order, 35 FCC Rcd at 729-31, paras. 98-104.

• Letter of Credit Bankruptcy Opinion Letter(s) from outside legal counsel regarding the treatment of the letter(s) of credit or its proceeds in a bankruptcy proceeding.<sup>45</sup> The letter must clearly state, subject only to customary assumptions, limitations, and qualifications, that, in a proceeding under the Bankruptcy Code, the bankruptcy court would not treat the letter of credit or proceeds of the letter of credit as property of the long-form applicant's bankruptcy estate, or the bankruptcy estate of any other bidderrelated entity requesting issuance of the letter of credit, under section 541 of the Bankruptcy Code.<sup>46</sup>

19. Once Commission staff has determined that a long-form application is complete and the long-form applicant is financially and technically qualified, and the letter(s) of credit and accompanying opinion letter(s) have been received and approved, WCB will issue a public notice announcing the authorization of support for the winning bid(s) and directing USAC to begin disbursing support.<sup>47</sup> USAC will issue a new study area code to each long-form applicant for each state in which it is authorized to receive support. Long-form applicants will be notified of the new study area code prior to the authorization for support along with procedures for disbursing support. Monthly support disbursements will begin shortly after the authorization public notice has been released.

20. If an applicant is not authorized to receive support for a winning bid, it will be in default and subject to forfeiture for that winning bid as described below.

## 2. Forfeiture in the Event of Default

21. As described in the *Rural Digital Opportunity Fund Order*,<sup>48</sup> winning bidders or longform applicants that have been assigned winning bids during the Divide Winning Bids stage will be subject to a forfeiture in the event of a default. A winning bidder or long-form applicant will be considered in default and will be subject to forfeiture if it fails to timely file a long-form application, fails to meet the document submission deadlines, is found ineligible or unqualified to receive Rural Digital Opportunity Fund support, and/or otherwise defaults on its winning bids or is disqualified for any reason prior to the authorization of support. Any such determination shall be final, and a winning bidder or longform applicant shall have no opportunity to cure through additional submissions, negotiations, or otherwise.

22. A winning bidder or long-form applicant that defaults will be subject to a base forfeiture per violation of \$3,000.<sup>49</sup> A violation is defined as any form of default with respect to the census block group. In other words, there shall be separate violations for each census block group assigned in a bid.<sup>50</sup> So that this base forfeiture amount is not disproportionate to the amount of a winning bidder's bid, the Commission has limited the total base forfeiture to 15% of the bidder's total assigned support for the bid for the support term.<sup>51</sup> Notwithstanding this limitation, the total base forfeiture will also be subject to

<sup>49</sup> *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 735-36, para. 115; *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6178, para. 322.

<sup>50</sup> Rural Digital Opportunity Fund Order, 35 FCC Rcd at 735, para. 115; Auction 904 Procedures Public Notice, 35 FCC Rcd at 6178, para. 322.

<sup>51</sup> *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 736, para. 117; *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6178, para. 322. This would occur in situations where the dollar amount associated with the bid is low. For example, assume Bidder A bids to serve 100 census block groups for \$100,000 over the support term. We (continued....)

<sup>&</sup>lt;sup>45</sup> 47 CFR § 54.804(c)(3); Auction 904 Procedures Public Notice, 35 FCC Rcd at 6177-78, para. 320; Rural Digital Opportunity Fund Order, 35 FCC Rcd at 735, para. 113.

<sup>&</sup>lt;sup>46</sup> 11 U.S.C. § 541; 47 CFR § 54.804(c)(3); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 735, para. 113.

<sup>47 47</sup> CFR § 54.804(b)(6)(vi).

<sup>&</sup>lt;sup>48</sup> *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 735-36, paras. 114-17; *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6178, paras. 321-22.

adjustment upward or downward based on the criteria set forth in the Commission's forfeiture guidelines.<sup>52</sup>

## C. General FCC Form 683 Information

23. For both the Divide Winning Bids and long-form application portions of FCC Form 683, the application may be filed at any time after the relevant filing window opens until the filing window closes. Applicants are strongly encouraged to file early and are responsible for allowing adequate time for filing their applications. Applications can be updated or amended multiple times until the relevant filing window closes.

24. A winning bidder and/or long-form applicant must always click on the CERTIFY & SUBMIT button on the "Certify & Submit" screen to successfully submit its FCC Form 683 and any modifications; otherwise, the application or changes to the application will not be received or reviewed by Commission staff. If a winning bidder or long-form applicant needs guidance or encounters technical difficulties in filing FCC Form 683, it may contact FCC Auctions Technical Support using the information in the Contact section, below.

## D. Maintaining Accuracy of Information

25. Each long-form applicant must make all changes to its information in the Auction Application System using FCC Form 683. With the release of this Public Notice, long-form applicants are no longer required to maintain the accuracy and completeness of information furnished in their FCC Form 183 applications.

26. A long-form applicant will be permitted to make minor modifications to its application after the deadline for submitting applications.<sup>53</sup> Minor modifications include correcting typographical errors and supplying non-material information that was inadvertently omitted or not available at the time the application was submitted.<sup>54</sup> If a long-form applicant makes a major modification to its application, the application will be denied.<sup>55</sup> In such an event, the long-form applicant will be subject to forfeiture. Major modifications include, but are not limited to, any changes in the ownership of the long-form applicant that constitute an assignment or transfer of control, any changes in the identity of the long-form applicant, or any changes in the required certifications.<sup>56</sup>

## E. Public Availability of FCC Form 683 Information

27. Information submitted in FCC Form 683 will generally be publicly available after Commission staff completes its review. Accordingly, a long-form applicant should take care not to include any unnecessary sensitive information, such as Taxpayer Identification Numbers or Social Security Numbers, in its application. However, consistent with the Commission's limited information procedures in place for Auction 904, certain information will be withheld from routine public inspection even after support is authorized. **To ensure that the information described below is afforded such** 

<sup>52</sup> See 47 U.S.C. § 503(b)(2)(B); 47 CFR § 1.80(b)(8), note to paragraph (b)(8); *Rural Digital Opportunity Fund* Order, 35 FCC Rcd at 736, para. 115; *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6178, para. 322.

<sup>53</sup> 47 CFR § 54.804(b)(6)(iii).

<sup>(</sup>Continued from previous page) ·

would impose a base forfeiture of 15,000 (15% of 100,000) because otherwise the base forfeiture would be 300,000, three times the entire bid amount ( $3,000 \times 100$  census block groups). In contrast, if Bidder B bids to serve 50 census block groups for 1,000,000 over the support term, we would impose a base forfeiture of  $150,000 (33,000 \times 50 \text{ census block groups})$ , which is 15% of the total bid.

<sup>&</sup>lt;sup>54</sup> Id.

<sup>&</sup>lt;sup>55</sup> Id. § 54.804(b)(6)(iv).

<sup>&</sup>lt;sup>56</sup> Id.

# confidential treatment, a long-form applicant must upload the information to FCC Form 683 using the appropriate attachment "type" as described in the instructions in Attachment C.

28. Information related to a long-form applicant's detailed technology and system design description, its project funding description, and its letter of credit will be treated as confidential and will be withheld from public inspection.<sup>57</sup> The Commission will treat long-form applicants that submit this information as having made a request to treat this information as confidential trade secrets and/or commercial information. As such, a long-form applicant need not submit a separate section 0.459 confidentiality request for this information with its FCC Form 683.

29. Moreover, a long-form applicant may request confidential treatment of its audited financial statements directly on FCC Form 683, using an abbreviated process under section 0.459(a)(4) of the Commission's rules. The applicant need not submit a separate section 0.459 confidentiality request with its FCC Form 683.<sup>58</sup>

30. Nevertheless, if a request for public inspection under section 0.461 is made for the long-form applicant's audited financial statements, detailed technology and system design description, project funding description, or letter of credit, the long-form applicant will be notified and then must justify the continued confidential treatment of the information if it objects to the disclosure.<sup>59</sup>

31. A long-form applicant may include with its FCC Form 683 a request that any other information submitted in its application not be made routinely available for public inspection following the procedures set forth in section 0.459 of the Commission's rules.<sup>60</sup> Requests for confidential treatment of information other than that discussed above will not be routinely granted.

## IV. OTHER IMPORTANT INFORMATION

## A. Maintaining Prohibition on Certain Communications

32. Section 1.21002 of the Commission's rules provides that, subject to specified exceptions, after the deadline for filing a short-form application, an applicant "is prohibited from communicating with any other applicant in any manner the substance of its own, or one another's, or any competing applicant's bids or bidding strategies, until after the post-auction deadline for winning bidders to submit applications for support."<sup>61</sup> As explained more fully in the *Auction 904 Procedures Public Notice*, this prohibition took effect as of the short-form application filing deadline, i.e., July 15, 2020, at 6:00 p.m. ET, and extends until the deadline for filing the long-form application portion of FCC Form 683, i.e., January 29, 2021, at 6:00 p.m. ET.<sup>62</sup>

58 47 CFR § 0.459(a)(4).

<sup>59</sup> *Id.* § 0.461

<sup>60</sup> Id. § 0.459.

<sup>61</sup> Id. § 1.21002(b).

<sup>&</sup>lt;sup>57</sup> *Id.* § 0.459; *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6130, 6168, 6175, paras. 141 n.325, 303 n.516, & 314 n.542. A long-form applicant's high-level initial project overview will be made publicly available. *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6167, para. 302. For the Connect America Phase II auction, a winning bidder's letter of credit from a qualified bank was treated as confidential trade secrets and/or commercial information and thus withheld from routine public inspection. *See Connect America Fund Phase II Auction Support for 962 Winning Bids Ready to Be Authorized; Listed Auction 903 Long-Form Applicants Must Submit Letters of Credit and Legal Counsel's Opinion Letters by March 13, 2019, AU Docket No. 17-182 et al., Public Notice, 34 FCC Rcd 955, 956 (WCB/OEA 2019). For the same reasons, we will withhold an applicant's letter of credit commitment letter, letter of credit, and bankruptcy opinion letter.* 

<sup>&</sup>lt;sup>62</sup> See Auction 904 Procedures Public Notice, 35 FCC Rcd at 6132, para. 151.

33. This prohibition applies to all short-form applicants regardless of whether such applicants became qualified bidders or actually bid.<sup>63</sup> We also emphasize that, for purposes of this prohibition, an "applicant" includes the entity filing the application, each entity capable of controlling the applicant, and each entity that may be controlled by the applicant or by an entity capable of controlling the applicant.<sup>64</sup>

34. With the release of this Public Notice, the Commission has made public auction-related information which previously would have been subject to the prohibition on certain communications.<sup>65</sup> Parties are reminded, however, that "bids or bidding strategies" encompasses more than information about bids submitted during the bidding portion of the auction. How an applicant participates in an auction is subject to the prohibition and includes, for example, a winning bidder filing a long-form application for support.<sup>66</sup> As noted in the *Auction 904 Procedures Public Notice*, information within the scope of the prohibition includes "subject areas include, but are not limited to, management, sales, local marketing agreements, and other transactional agreements."<sup>67</sup> We note that proxy bid instructions, which may reflect such information, remain non-public.

35. Moreover, the prohibition of "communicating in any manner" includes public disclosures, private communications, and indirect or implicit communications, as well as express statements of bids and bidding strategies.<sup>68</sup> Consequently, an applicant must take care to determine whether its auction-related communications may reach another applicant.

## B. High-Cost Eligible Telecommunications Carrier Designations

36. As noted above, by Monday, June 7, 2021, the long-form applicant must have obtained from either the relevant state authority or, where such authority lacks jurisdiction, from the Commission, a high-cost ETC designation(s) that covers its winning bid areas. The long-form applicant must submit for each state the required documentation and a certification letter from an officer.<sup>69</sup> Long-form

<sup>64</sup> 47 CFR § 1.21002(a).

<sup>65</sup> In addition, the combination of publicly available short-form application information and bidding information made available today effectively makes public the information that can be derived from such sources, including the potential assignee(s) of each winning bid. Accordingly, we clarify that the prohibition does not apply to information about the selection of assignees for winning bids in the Divide Winning Bids process.

<sup>66</sup> 47 CFR § 1.21004; *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6133, para. 155 ("communicating, among other things, how an applicant will participate . . . would convey bids or bidding strategies and would thus be prohibited").

<sup>67</sup> Auction 904 Procedures Public Notice, 35 FCC Rcd at 6133, para. 156.

<sup>68</sup> *Id.*; *see generally Updating Part 1 Competitive Bidding Rules*, WT Docket No. 14-170 et al., Report and Order et al., 30 FCC Rcd 7493, 7577, para. 199 (2015) (explaining that similar section 1.2105(c) language prohibiting communicating bids or bidding strategies "in any manner" bars "communicating bids or bidding information, either directly or indirectly"); *Cascade Access, L.L.C.*, Forfeiture Order, 28 FCC Rcd 141, 144, para. 7 (EB 2013) (rejecting argument that the communication was not prohibited because it did not reveal the "substance" of Cascade's bids or bidding strategies).

<sup>69</sup> 47 CFR § 54.804(b)(5); Auction 904 Procedures Public Notice, 35 FCC Rcd at 6176, para. 316.

<sup>&</sup>lt;sup>63</sup> An entity that submits an application becomes an "applicant" under the rule at the application filing deadline and that status does not change based on subsequent developments. *See, e.g., Star Wireless, LLC v. FCC*, 522 F.3d 469 (D.C. Cir. 2008) (section 1.2105(c) applies to applicants regardless of whether they are qualified to bid). Thus, an auction applicant that does not correct deficiencies in its application, or does not otherwise become qualified, remains an "applicant" for purposes of the rule and remains subject to the prohibition on certain communications until the long-form application filing deadline.

applicants subject to state jurisdiction must petition the relevant state commissions for ETC designation and should follow state rules and requirements to apply for designation(s).<sup>70</sup> Long-form applicants not subject to state jurisdiction must petition the Commission for designation(s) as described in the *ETC Public Notice*.<sup>71</sup> Petitioners for FCC designation do not need to include a list of census blocks with their ETC petition but should certify they will serve all blocks for which the long-form applicant has or will seek an award of support in that state.<sup>72</sup>

37. In the event a long-form applicant determines that it will be unable to obtain the necessary ETC designations within 180 days, it should upload a petition for waiver of the deadline to its FCC Form 683 and in AU Docket No. 20-34. The Commission has found that it would be appropriate to waive the 180-day timeframe if the long-form applicant is able to demonstrate that it has engaged in good faith efforts to obtain an ETC designation, but the proceeding is not yet complete.<sup>73</sup> A waiver of the 180-day deadline would be appropriate if, for example, the applicant (or an associated entity) has an ETC application pending with a state and the state's next scheduled meeting at which it would consider the ETC application will occur after the 180-day window. When considering waivers of the 180-day deadline for obtaining ETC designation, we will presume that an entity acted in good faith if the entity files its ETC application within **30 days** of the release of this Public Notice.<sup>74</sup>

## C. Public Interest Obligations and Annual Reporting Requirements

38. To ensure that Rural Digital Opportunity Fund support meets the Commission's public interest objectives, a long-form applicant that has received notice from the Commission that it is authorized to receive Rural Digital Opportunity Fund support will be subject to a variety of obligations, including service requirements, service milestones, reporting, and record retention requirements.<sup>75</sup> This includes the requirement that support recipients test and certify compliance with the relevant performance requirements in accordance with the uniform framework that has been adopted for measuring and reporting on the performance of high-cost support recipients' service.<sup>76</sup>

<sup>72</sup> Petitioners may, in addition to seeking a high-cost designation in winning bid areas, seek a Lifeline-only ETC designation in areas not eligible for high-cost support for the limited purpose of becoming eligible to receive only Lifeline support in such areas. When doing so, they must submit with their ETC application a map or other information delineating these Lifeline-only areas, and other information specifically required by the Commission's Lifeline rules. *See, e.g., Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund*, WC Docket Nos. 09-197 & 10-90, Order, 34 FCC Rcd 10533 (WCB 2019); 47 CFR § 54.202(a)(4)-(6).

<sup>73</sup> Rural Digital Opportunity Fund Order, 35 FCC Rcd at 723, para. 81.

<sup>74</sup> Id.

<sup>75</sup> See, e.g., 47 CFR §§ 54.313, 54.314, 54.316, 54.320, 54.802, 54.805, 54.806; *Auction 904 Procedures Public Notice*, 35 FCC Rcd at 6082-86, 6127-29, paras. 15-21, 135-39 (providing a high-level summary of the relevant public interest obligations and high-cost ETC obligations).

<sup>76</sup> 47 CFR § 54.313(a)(6). See also, CAF Performance Measures Order, 33 FCC Rcd 6509. Further modifications were made to the performance measures requirements in subsequent reconsideration orders. See Connect America Fund, WC Docket No. 10-90, Order on Reconsideration, 34 FCC Rcd 8081 (WCB/WTB/OET 2019) (CAF Performance Measures First Reconsideration Order); CAF Performance Measures Second Reconsideration Order, 34 FCC Rcd 10109.

<sup>&</sup>lt;sup>70</sup> 47 U.S.C. § 214(e)(2).

<sup>&</sup>lt;sup>71</sup> *Id.* at § 214(e)(6); *WCB Reminds Connect America Fund Phase II Auction Applicants of the Process for Obtaining a Federal Designation as an Eligible Telecommunications Carrier*, Public Notice, WC Docket No. 09-197 et al., 33 FCC Rcd 6696 (WCB 2018) (*ETC Public Notice*). As described in this public notice, the Commission places the burden of proof upon the petitioner seeking a Commission ETC designation to demonstrate that the Commission has jurisdiction. *Id.* at 6696-97. We extend to Auction 904 winners the same waivers of section 54.202 of the Commission's rules for the reasons described in the *ETC Public Notice* and the same presumption that designation will serve the public interest. *See id.* at. 6699-6700; 47 CFR § 54.202.

39. An Auction 904 support recipient will be subject to non-compliance measures if it fails or is unable to meet the service milestones or other service requirements, or fails to fulfill any other term or condition of Rural Digital Opportunity Fund support.<sup>77</sup> As described in the *Rural Digital Opportunity Fund Order* and the *CAF Performance Measures Order*, these measures will scale with the extent of non-compliance, and include additional reporting, withholding of support, support recovery, and drawing on the support recipient's letter of credit if the support recipient cannot pay back the relevant support by the applicable deadline.<sup>78</sup> A support recipient may also be subject to other sanctions for non-compliance with the terms and conditions of Rural Digital Opportunity Fund support, including, but not limited to, the Commission's existing enforcement procedures and penalties, reductions in support amounts, potential revocation of ETC designations, and suspension or debarment.<sup>79</sup>

40. We also remind applicants that all Auction 904 support recipients will be subject to the Commission's National Security Supply Chain proceeding, including the rule that "no universal service support may be used to purchase, obtain, maintain, improve, modify, or otherwise support any equipment or services produced or provided by any company posing a national security threat to the integrity of communications networks or the communications supply chain."<sup>80</sup> The prohibition on using universal service funds applies "to upgrades and maintenance of existing equipment and services."<sup>81</sup>

## D. Access to the Bidding System

41. The bidding system will remain accessible to Auction 904 qualified bidders until 3:00 p.m. ET on Thursday, December 10, 2020. Bidders should download any files they wish to save from the bidding system before that time.

## E. Return of SecurID<sup>®</sup> Tokens

42. The SecurID<sup>®</sup> tokens distributed to qualified bidders are tailored to Auction 904 and will not function in future auctions. The Commission will send each bidder, along with the copy of this Public Notice, a pre-addressed, stamped envelope to return its SecurID<sup>®</sup> tokens. Each bidder should return its SecurID<sup>®</sup> token(s) to the Commission for recycling.

#### F. Contact Information

43. For further information, contact:

#### **Technical Support**

Electronic Filing Auction Application System and CAF II Bidding System (Hardware/Software Issues)

#### **Press Information**

FCC Auctions Technical Support Hotline (877) 480-3201, option nine; or (202) 414-1250

(202) 414-1255 (TTY) Hours of service: 8:00 a.m. – 6:00 p.m. ET, Monday through Friday

Anne Veigle, (202) 418-0500

<sup>&</sup>lt;sup>77</sup> 47 CFR §§ 54.804(c)(4), 54.320, 54.806.

<sup>&</sup>lt;sup>78</sup> *Id.* §§ 54.804(c)(4), 54.320, 54.806; *CAF Performance Measures Order*, 33 FCC Rcd at 6531-33, paras. 60-67; *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 713-16, paras. 58-64.

<sup>&</sup>lt;sup>79</sup> 47 CFR § 54.320(c), 54.806(b); *Rural Digital Opportunity Fund Order*, 35 FCC Rcd at 716, para. 63.

<sup>80 47</sup> CFR § 54.9(a).

<sup>&</sup>lt;sup>81</sup> Protecting Against National Security Threats to the Communication Supply Chain through FCC Programs et al., WC Docket No. 18-89 et al., Report and Order et al., 34 FCC Rcd 11423, 11453, para. 77 (2019).

#### **General Universal Service Information**

#### Wireline Competition Bureau,

**Telecommunications Access Policy Division** Alex Minard Heidi Lankau Lauren Garry Ian Forbes (202) 418-7400

#### **FCC Auctions Hotline**

(888) 225-5322, option two; or (717) 338-2868

#### **Rural Broadband Auctions Task Force**

Michael Janson, (202) 418-0627 Kirk Burgee, (202) 418-1599 Jonathan McCormack, (202) 418-1065 Audra Hale-Maddox, (202) 418-0794

#### **Office of Economics and Analytics Auctions Division** Mark Montano

Daniel Habif (202) 418-0660

#### Office of Communications Business Opportunities (202) 418-0990 www.fcc.gov/ocbo

#### **Consumer and Governmental Affairs Bureau** (202) 418-0530 or (202) 418-0432 (TTY) fcc504@fcc.gov

www.fcc.gov/auction/904

- FCC -

#### **General Auction Information**

General Auction Questions Auction Process and Procedures

#### **Auction 904 Information**

Post-Auction Rules, Policies, and Regulations

#### **Small Businesses**

Additional information for small and disadvantaged businesses

#### **Accessible Formats**

Braille, large print, electronic files, or audio format for people with disabilities

#### **FCC Internet Sites**

Auction ID: 904

### Winning Bidder Summary

(Sorted by Bidder Name)



Didden		Ctoto	Assigned Support over 10	Number of Locations
Bidder	FRN	State	Years	Assigned
4-Corners Consortium	0029719283	New Mexico	\$ 2,598,030.00	635
AB Indiana LLC	0021994686	Florida	\$ 668,304.10	261
ACT	0029754652	Mississippi	\$ 1,622,136.00	925
Albion Telephone Company, Inc.	0003714805	Utah	\$ 599,795.70	141
All West Communications, Inc.	0004924809	Wyoming	\$ 46,648.00	218
Allen's T.V. Cable Service, Inc.	0003746898	Louisiana	\$ 371,348.10	620
Altice USA, Inc.	0025637406	Arkansas	\$ 58,415.00	528
Altice USA, Inc.	0025637406	Idaho	\$ 10,556.00	140
Altice USA, Inc.	0025637406	Kentucky	\$ 351,065.00	1,734
Altice USA, Inc.	0025637406	Louisiana	\$ 303,952.00	2,267
Altice USA, Inc.	0025637406	Texas	\$ 364.00	15
Altice USA, Inc.	0025637406	West Virginia	\$ 125,528.00	536
American Heartland	0002594190	lowa	\$ 1,821,520.00	1,549
AMG Technology Investment Group	0021701891	Illinois	\$ 193,098,839.90	68,921
AMG Technology Investment Group	0021701891	Indiana	\$ 18,947,203.50	11,803
AMG Technology Investment Group LLC	0021701891	lowa	\$ 112,637,885.70	36,228

Auction ID: 904

### Winning Bidder Summary

(Sorted by Bidder Name)



			Assigned Support over 10	Number of Locations
Bidder	FRN	State	Years	Assigned
AMG Technology Investment Group	0021701891	Kansas	\$ 25,546,674.50	26,466
AMG Technology Investment Group LLC	0021701891	Louisiana	\$ 6,901,822.70	1,916
AMG Technology Investment Group LLC	0021701891	Minnesota	\$ 3,736,316.00	1,408
AMG Technology Investment Group LLC	0021701891	Nebraska	\$ 25,350,146.70	13,919
AMG Technology Investment Group LLC	0021701891	New Mexico	\$ 75,554.00	265
AMG Technology Investment Group LLC	0021701891	Oklahoma	\$ 2,400,610.00	4,858
AMG Technology Investment Group LLC	0021701891	Texas	\$ 24,510,588.90	38,003
AMG Technology Investment Group LLC	0021701891	Wisconsin	\$ 1,084,045.00	346
AMG Technology Investment Group LLC	0021701891	Wyoming	\$ 14,938,386.00	2,003
Aptitude Internet LLC	0021134119	Missouri	\$ 24,655,295.20	13,535
Armstrong Telephone Company - Northern Division	0004311528	New York	\$ 21,570,556.90	9,719
Armstrong Telephone Company - Northern Division	0004311528	Ohio	\$ 94,185.50	240

Auction ID: 904

### Winning Bidder Summary

(Sorted by Bidder Name)



			Assigned	Number of
Bidder	FRN	State	Support over 10 Years	Locations Assigned
Armstrong Telephone Company - Northern Division	0004311528	Pennsylvania	\$ 344,898.10	536
Arrowhead Electric Cooperative, Inc.	0007083470	Minnesota	\$ 18,462,273.10	4,879
Atlantic Broadband Finance, LLC	0015336449	Virginia	\$ 5,407,684.70	3,876
Baldwin Telecom, Inc.	0002723534	Wisconsin	\$ 11,370.00	15
Bandera Electric Cooperative, Inc.	0026644666	Texas	\$ 1,689,601.50	534
Baraga Telephone Company	0024157745	Michigan	\$ 444,490.80	164
Barry Technology Services, LLC	0024047409	Missouri	\$ 14,502.00	26
Bay Springs Telephone Company, Inc.	0003723640	Alabama	\$ 320,837.50	206
Bay Springs Telephone Company, Inc.	0003723640	Mississippi	\$ 41,265,320.50	21,061
Bay Springs Telephone Company, Inc.	0003723640	Tennessee	\$ 285,692.10	744
BEK Communications Cooperative	0002477636	North Dakota	\$ 2,157,719.00	337
Blackfoot Telephone Cooperative, Inc.	0001646165	Montana	\$ 12,703,077.60	2,687
Bloosurf, LLC	0019496462	Delaware	\$ 1,080.00	8
Bloosurf, LLC	0019496462	Maryland	\$ 780.50	9
Bruce Telephone Company, Inc.	0003773520	Wisconsin	\$ 113,745.00	32
Cal.net, Inc.	0020855656	California	\$ 29,169,982.60	44,153
California Internet, L.P. dba GeoLinks	0023707953	Arizona	\$ 79,169,580.00	32,474
California Internet, L.P. dba GeoLinks	0023707953	California	\$ 149,035,762.70	92,678

Auction ID: 904

### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
California Internet, L.P. dba GeoLinks	0023707953	Nevada	\$ 6,684,323.00	3,145
Carolina West Wireless, Inc.	0001940022	North Carolina	\$ 460.00	28
CCO Holdings, LLC	0014939466	Alabama	\$ 51,287,535.00	56,451
CCO Holdings, LLC	0014939466	California	\$ 231,834.70	1,045
CCO Holdings, LLC	0014939466	Florida	\$ 22,577,363.90	17,869
CCO Holdings, LLC	0014939466	Georgia	\$ 29,965,114.40	23,854
CCO Holdings, LLC	0014939466	Illinois	\$ 1,029,666.00	501
CCO Holdings, LLC	0014939466	Indiana	\$ 59,927,209.10	54,541
CCO Holdings, LLC	0014939466	Kentucky	\$ 58,088,334.90	31,747
CCO Holdings, LLC	0014939466	Louisiana	\$ 29,508,812.00	25,389
CCO Holdings, LLC	0014939466	Massachusetts	\$ 21,639,762.70	14,344
CCO Holdings, LLC	0014939466	Michigan	\$ 21,663,643.40	35,944
CCO Holdings, LLC	0014939466	Missouri	\$ 48,392,327.90	61,524
CCO Holdings, LLC	0014939466	New Hampshire	\$ 2,140,554.00	1,044
CCO Holdings, LLC	0014939466	New Mexico	\$ 11,217.90	485
CCO Holdings, LLC	0014939466	North Carolina	\$ 142,076,655.00	128,509
CCO Holdings, LLC	0014939466	Ohio	\$ 106,576,629.80	112,777
CCO Holdings, LLC	0014939466	Oregon	\$ 33,534,210.20	15,139

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### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
CCO Holdings, LLC	0014939466	Pennsylvania	\$ 3,479,199.00	5,328
CCO Holdings, LLC	0014939466	South Carolina	\$ 112,443,940.10	98,670
CCO Holdings, LLC	0014939466	Tennessee	\$ 92,855,626.70	79,193
CCO Holdings, LLC	0014939466	Texas	\$ 186,793,359.90	133,993
CCO Holdings, LLC	0014939466	Vermont	\$ 29,725.20	85
CCO Holdings, LLC	0014939466	Virginia	\$ 18,317,211.00	11,369
CCO Holdings, LLC	0014939466	Washington	\$ 11,643,447.20	4,625
CCO Holdings, LLC	0014939466	Wisconsin	\$ 168,400,490.10	143,269
Cellular Services LLC.	0007737950	Kentucky	\$ 3,294,968.60	2,142
Central Arkansas Telephone Cooperative, Inc.	0004268918	Arkansas	\$ 1,629,930.50	1,004
Centre WISP Venture Company, LLC	0025132648	Pennsylvania	\$ 11,086,348.40	6,607
CenturyLink, Inc.	0018626853	Alabama	\$ 18,597,092.50	5,965
CenturyLink, Inc.	0018626853	Arkansas	\$ 9,378,743.10	2,958
CenturyLink, Inc.	0018626853	Colorado	\$ 7,482,178.00	1,509
CenturyLink, Inc.	0018626853	Florida	\$ 5,039,442.60	1,495
CenturyLink, Inc.	0018626853	Idaho	\$ 11,650,567.20	2,576
CenturyLink, Inc.	0018626853	Louisiana	\$ 18,742,492.20	7,616
CenturyLink, Inc.	0018626853	Michigan	\$ 9,905,380.00	2,556

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### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
CenturyLink, Inc.	0018626853	Minnesota	\$ 15,646,093.10	3,265
CenturyLink, Inc.	0018626853	Missouri	\$ 275,208.00	38
CenturyLink, Inc.	0018626853	Montana	\$ 28,379,920.90	9,658
CenturyLink, Inc.	0018626853	Nebraska	\$ 326,802.00	69
CenturyLink, Inc.	0018626853	New Mexico	\$ 2,038,002.00	770
CenturyLink, Inc.	0018626853	North Carolina	\$ 530,376.00	169
CenturyLink, Inc.	0018626853	Oregon	\$ 41,423,187.80	8,982
CenturyLink, Inc.	0018626853	Pennsylvania	\$ 21,483,885.10	5,614
CenturyLink, Inc.	0018626853	South Dakota	\$ 121,060.00	10
CenturyLink, Inc.	0018626853	Virginia	\$ 12,518,109.10	6,832
CenturyLink, Inc.	0018626853	Washington	\$ 45,838,633.80	14,875
CenturyLink, Inc.	0018626853	Wisconsin	\$ 3,135,119.80	832
CenturyLink, Inc.	0018626853	Wyoming	\$ 9,855,321.00	1,468
Chariton Valley Communications Corporation	0008437147	Missouri	\$ 8,070,272.00	5,002
Cherry Capital Connection, LLC	0017117037	Michigan	\$ 5,620,840.40	2,791
Cincinnati Bell Inc.	0003018033	Hawaii	\$ 24,313,582.00	8,049
Cincinnati Bell Inc.	0003018033	Indiana	\$ 56,802.00	68
Cincinnati Bell Inc.	0003018033	Kentucky	\$ 2,091,668.00	2,479

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### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
Cincinnati Bell Inc.	0003018033	Ohio	\$ 425,528.40	535
Citizens Vermont Acquisition Corporation	0029752581	New York	\$ 373,680.00	316
City of Farmington	0001609163	New Mexico	\$ 3,179,884.50	1,106
Citynet West Virginia, LLC	0009725672	West Virginia	\$ 53,516,858.30	13,460
Co-op Connections Consortium	0029743770	Illinois	\$ 1,120,026.00	507
Co-op Connections Consortium	0029743770	Indiana	\$ 723,260.00	788
Co-op Connections Consortium	0029743770	Kentucky	\$ 3,290,415.80	1,478
Co-op Connections Consortium	0029743770	North Carolina	\$ 720,792.00	263
Co-op Connections Consortium	0029743770	Oklahoma	\$ 4,446,839.00	4,677
Co-op Connections Consortium	0029743770	Pennsylvania	\$ 42,622,762.00	12,440
Co-op Connections Consortium	0029743770	Tennessee	\$ 2,519,752.70	4,794
Co-op Connections Consortium	0029743770	Virginia	\$ 6,041,742.00	1,962
Coleman County Telephone Cooperative, Inc.	0001678044	Texas	\$ 3,142.80	11
Comcell Inc.	0001649078	Texas	\$ 4,644.00	8
Commnet Wireless, LLC	0007116403	California	\$ 335,484.60	565
Commnet Wireless, LLC	0007116403	Colorado	\$ 3,368,990.50	785
Commnet Wireless, LLC	0007116403	Idaho	\$ 2,594,984.30	1,400

Auction ID: 904

### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
Commnet Wireless, LLC	0007116403	Louisiana	\$ 131,651.00	243
Commnet Wireless, LLC	0007116403	Mississippi	\$ 1,019,088.00	1,343
Commnet Wireless, LLC	0007116403	Montana	\$ 5,964,913.70	2,078
Commnet Wireless, LLC	0007116403	New Mexico	\$ 424,184.00	236
Commnet Wireless, LLC	0007116403	Pennsylvania	\$ 6,624,682.30	6,533
Commnet Wireless, LLC	0007116403	Washington	\$ 7,776,005.70	5,639
Commnet Wireless, LLC	0007116403	West Virginia	\$ 196,952.00	206
Computer 5, Inc. d/b/a LocalTel Communications	0014511364	Washington	\$ 48,818,171.30	12,530
Computer Techniques, Inc. dba CTI Fiber	0017141102	Illinois	\$ 8,509.00	12
Connect Everyone LLC	0029746260	Alabama	\$ 28,734,657.00	8,155
Connect Everyone LLC	0029746260	Arizona	\$ 61,819,443.30	22,472
Connect Everyone LLC	0029746260	Colorado	\$ 17,106,769.00	5,190
Connect Everyone LLC	0029746260	Illinois	\$ 19,233,356.00	9,534
Connect Everyone LLC	0029746260	Mississippi	\$ 18,130,649.90	4,256
Connect Everyone LLC	0029746260	Nevada	\$ 51,509,167.40	20,923
Connect Everyone LLC	0029746260	Ohio	\$ 38,273,659.90	18,280
Connect Everyone LLC	0029746260	Pennsylvania	\$ 24,513,988.00	13,792

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### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
Connect Everyone LLC	0029746260	Virginia	\$ 9,529,625.40	5,904
Connecting Rural America	0004339487	Alabama	\$ 10,395,132.20	3,792
Connecting Rural America	0004339487	Georgia	\$ 1,710,996.00	555
Connecting Rural America	0004339487	Illinois	\$ 2,040,864.80	708
Connecting Rural America	0004339487	North Carolina	\$ 33,606.00	21
Consolidated Communications, Inc.	0018633321	Florida	\$ 831,384.00	227
Consolidated Communications, Inc.	0018633321	Illinois	\$ 424,956.00	303
Consolidated Communications, Inc.	0018633321	Maine	\$ 31,067,177.00	11,513
Consolidated Communications, Inc.	0018633321	Minnesota	\$ 11,126.00	12
Consolidated Communications, Inc.	0018633321	New Hampshire	\$ 7,361,013.10	4,644
Consolidated Communications, Inc.	0018633321	Texas	\$ 140,964.00	199
Consolidated Communications, Inc.	0018633321	Vermont	\$ 19,036,717.40	10,123
Consortium 2020	0029754959	Arizona	\$ 19,787,039.50	15,636
Consortium 2020	0029754959	California	\$ 29,131,921.40	52,456
Consortium 904	0016085920	Oklahoma	\$ 40,470.00	120
Consortium of AEG and Heron Broadband I	0029770831	Michigan	\$ 187,669,124.00	48,449
Consortium of AEG and Heron Broadband I	0029770831	Minnesota	\$ 6,709,428.00	1,150

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### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
Continental Divide Electric Cooperative	0026618306	New Mexico	\$ 38,004,786.20	8,485
Corn Belt Telephone	0002592517	lowa	\$ 42,237.00	38
Cox Communications, Inc.	0001834696	Arizona	\$ 175,042.20	1,387
Cox Communications, Inc.	0001834696	Arkansas	\$ 1,430,663.20	1,665
Cox Communications, Inc.	0001834696	California	\$ 2,386,243.70	3,118
Cox Communications, Inc.	0001834696	Kansas	\$ 14,314.50	102
Cox Communications, Inc.	0001834696	Louisiana	\$ 686,075.00	442
Cox Communications, Inc.	0001834696	Nebraska	\$ 643,867.00	185
Cox Communications, Inc.	0001834696	Nevada	\$ 286,903.30	812
Cox Communications, Inc.	0001834696	Oklahoma	\$ 93,852.00	142
Cox Communications, Inc.	0001834696	Virginia	\$ 919,559.60	359
Custer Telephone Cooperative, Inc.	0001623321	Idaho	\$ 1,954,488.00	313
Daktel Communications, LLC	0007266703	North Dakota	\$ 531,894.00	66
Daviess-Martin County Rural Telephone Corporation	0004328704	Indiana	\$ 3,565,039.40	1,371
Digital Connections Inc. dba PRODIGI	0005848759	West Virginia	\$ 8,583,001.40	4,771
Direct Communications Rockland, Inc	0004321790	Idaho	\$ 15,745,252.70	2,120
DoCoMo Pacific, Inc.	0004242723	Northern Mariana Islands	\$ 3,706,235.00	530
DTC Cable, Inc.	0005015607	New York	\$ 834,597.00	481

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### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
Easton Utilities Commission	0003793726	Maryland	\$ 189,047.60	909
Emery Telephone dba Emery Telcom	0001607340	Utah	\$ 9,822,853.00	1,602
Enduring Internet	0018706002	New Mexico	\$ 11,880.00	83
Enduring Internet	0018706002	Wyoming	\$ 53,810.00	309
Etheric Communications LLC	0013358395	California	\$ 248,634,963.10	64,463
Farmers Mutual Cooperative Telephone Company	0004776464	Iowa	\$ 12,447.00	25
Farmers Mutual Telephone Company	0003747722	Minnesota	\$ 759,822.00	332
Federated Telephone Cooperative	0003741576	Minnesota	\$ 537,399.00	248
FiberLight, LLC	0014117139	Georgia	\$ 458,892.20	687
FiberLight, LLC	0014117139	New Mexico	\$ 246,737.80	940
FiberLight, LLC	0014117139	Virginia	\$ 1,067,075.80	3,038
Fond du Lac Communications Inc	0029221694	Minnesota	\$ 1,046,123.00	728
Frontier Communications Corporation, DIP	0029445723	California	\$ 33,379,752.20	14,943
Frontier Communications Corporation, DIP	0029445723	Connecticut	\$ 320,106.00	80
Frontier Communications Corporation, DIP	0029445723	Florida	\$ 492,732.00	838

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### Winning Bidder Summary

(Sorted by Bidder Name)



			Assigned Support over 10	Number of Locations
Bidder	FRN	State	Years	Assigned
Frontier Communications Corporation, DIP	0029445723	Illinois	\$ 10,139,606.70	3,315
Frontier Communications Corporation, DIP	0029445723	New York	\$ 37,291,314.60	12,226
Frontier Communications Corporation, DIP	0029445723	Pennsylvania	\$ 40,977,864.00	15,782
Frontier Communications Corporation, DIP	0029445723	Texas	\$ 673,062.00	613
Frontier Communications Corporation, DIP	0029445723	West Virginia	\$ 247,626,395.30	79,391
Frontier Communications Northwest, LLC	0029765211	Idaho	\$ 22,603,097.80	6,386
Frontier Communications Northwest, LLC	0029765211	Montana	\$ 5,818,165.30	1,874
Frontier Communications Northwest, LLC	0029765211	Oregon	\$ 8,715,378.00	3,706
Frontier Communications Northwest, LLC	0029765211	Washington	\$ 20,066,009.70	9,370
Gardonville Cooperative Telephone Association	0004320164	Minnesota	\$ 63,903.00	24
GigaBeam Networks, LLC	0018473223	Virginia	\$ 92.00	1
GigaBeam Networks, LLC	0018473223	West Virginia	\$ 28,067,789.20	9,071

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### Winning Bidder Summary

(Sorted by Bidder Name)

#### Date of Report: 12/07/2020 08:17 AM ET



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
Grain Communications Opportunity Fund II, L.P.	0029662251	California	\$ 5,475,647.80	1,620
Grain Communications Opportunity Fund II, L.P.	0029662251	Nebraska	\$ 19,816.40	116
Grain Communications Opportunity Fund II, L.P.	0029662251	Oregon	\$ 13,677,209.40	4,151
Great Plains Consortium	0003741550	Minnesota	\$ 81,700.60	402
Great Plains Consortium	0003741550	North Dakota	\$ 15,582.00	3
Great Plains Consortium	0003741550	South Dakota	\$ 3,330,590.70	1,474
H&B Communication's, Inc.	0002331601	Kansas	\$ 11,301.60	47
Halstad Telephone Company	0003744224	Minnesota	\$ 3,118,056.40	603
Halstad Telephone Company	0003744224	North Dakota	\$ 9,023,062.00	1,217
Hamilton County Telephone Co-op	0004323499	Illinois	\$ 7,796,825.30	2,351
Hamilton Long Distance Company	0003708013	Nebraska	\$ 128,560.30	167
Hankins Information Technology	0027344498	California	\$ 2,171,844.50	3,727
Hawaii Dialogix Telecom LLC	0023933112	Illinois	\$ 5,687,249.00	1,364
Hawaii Dialogix Telecom LLC	0023933112	Michigan	\$ 219,918.00	15
Hawaii Dialogix Telecom LLC	0023933112	Ohio	\$ 102,786.00	16
Heart of the Catskills Comm. Inc., dba	0004984837	New York	\$ 398,574.00	188

MTC Cable

## Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
Home Communications, Inc.	0010627446	Kansas	\$ 15,540.00	54
HomeTown Broadband, Inc.	0029677846	Arkansas	\$ 1,424,229.00	1,295
Horizon Communications, Inc.	0016300493	Wyoming	\$ 2,033,292.00	609
Horry Telephone Cooperative, Inc.	0001886944	South Carolina	\$ 729,554.50	2,267
Hotwire Communications, Ltd	0009846494	Florida	\$ 5,150,040.00	3,233
Hughes Network Systems, LLC	0017434911	Rhode Island	\$ 1,273,784.00	3,678
IdeaTek Telcom, LLC	0015798648	Kansas	\$ 23,590.60	89
KanOkla Telephone Association	0004362364	Kansas	\$ 15,966.00	59
KanOkla Telephone Association	0004362364	Oklahoma	\$ 10,572.00	31
Lakeland Communications Group, LLC	0003744398	Wisconsin	\$ 408,952.00	550
LICT Corporation	0007759178	California	\$ 1,063,513.10	235
LICT Corporation	0007759178	Iowa	\$ 71,984.70	98
LICT Corporation	0007759178	Wisconsin	\$ 540,329.00	302
LigTel Communications, Inc.	0007770084	Indiana	\$ 385,924.00	416
LR Communications, Inc.	0014024640	Kansas	\$ 13,974.00	24
LTD Broadband LLC	0020926788	California	\$ 187,506,059.70	76,856
LTD Broadband LLC	0020926788	Colorado	\$ 69,016,527.10	11,518
LTD Broadband LLC	0020926788	Illinois	\$ 103,247,994.10	42,503

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### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
LTD Broadband LLC	0020926788	Indiana	\$ 54,456,917.90	31,330
LTD Broadband LLC	0020926788	lowa	\$ 23,184,786.30	12,916
LTD Broadband LLC	0020926788	Kansas	\$ 3,228,948.00	2,122
LTD Broadband LLC	0020926788	Minnesota	\$ 311,877,936.40	102,005
LTD Broadband LLC	0020926788	Missouri	\$ 158,793,688.30	52,812
LTD Broadband LLC	0020926788	Nebraska	\$ 33,228,644.40	28,729
LTD Broadband LLC	0020926788	North Dakota	\$ 8,574,318.00	831
LTD Broadband LLC	0020926788	Ohio	\$ 8,179,419.00	4,766
LTD Broadband LLC	0020926788	Oklahoma	\$ 81,098,352.90	39,889
LTD Broadband LLC	0020926788	South Dakota	\$ 46,588,453.80	7,481
LTD Broadband LLC	0020926788	Texas	\$ 42,668,488.60	26,260
LTD Broadband LLC	0020926788	Wisconsin	\$ 189,270,184.10	88,070
MARQUETTE-ADAMS TELEPHONE COOPERATIVE, INC.	0003774023	Wisconsin	\$ 55,378.00	66
MCC Network Services, LLC	0025942202	Illinois	\$ 36,204.00	72
Mediacom Communications Corporation	0007282312	Alabama	\$ 1,449,630.10	5,700
Mediacom Communications Corporation	0007282312	Florida	\$ 93,814.20	507

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### Winning Bidder Summary

(Sorted by Bidder Name)



			Assigned	Number of Locations
Bidder	FRN	State	Support over 10 Years	Assigned
Mediacom Communications Corporation	0007282312	Georgia	\$ 407,683.90	1,824
Mediacom Communications Corporation	0007282312	North Carolina	\$ 303,526.80	1,721
MEI Telecom, Inc.	0023107519	Michigan	\$ 479,789.10	175
Mercury Wireless, Inc.	0018603027	Illinois	\$ 5,109,552.80	9,633
Mercury Wireless, Inc.	0018603027	Indiana	\$ 9,746,150.00	20,961
Mercury Wireless, Inc.	0018603027	Kansas	\$ 147,073.60	765
Mercury Wireless, Inc.	0018603027	Michigan	\$ 37,598,649.40	77,925
Mercury Wireless, Inc.	0018603027	Missouri	\$ 4,254,918.50	14,094
Mercury Wireless, Inc.	0018603027	Ohio	\$ 11,454,497.70	44,306
Micrologic Inc.	0018675256	West Virginia	\$ 10,036,047.70	2,076
Midcontinent Communications	0002621951	Minnesota	\$ 4,453,803.70	6,058
Midcontinent Communications	0002621951	North Dakota	\$ 184,168.80	206
Midcontinent Communications	0002621951	South Dakota	\$ 322,500.50	242
Miles Communications LLC	0003734951	Iowa	\$ 316,641.00	106
Minnesota Connections c/o Consolidated Tel Company	0003742467	Minnesota	\$ 2,040,278.70	979
Mountain View Telephone Company	0001730944	Arkansas	\$ 298,572.00	43

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### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder			Assigned Support over 10	Number of Locations
	FRN	State	Years	Assigned
Mountain West Technologies Corporation	0015643182	Wyoming	\$ 141,801.20	690
NBVDS Investment, L.L.C.	0017194986	Oklahoma	\$ 1,655,443.40	2,387
Net Ops Communications, LLC	0025394529	Texas	\$ 69,676.40	1,586
Newport Utilities	0027152438	Tennessee	\$ 159,492.00	59
NexTier Consortium	0029756582	Alabama	\$ 1,368,306.90	4,116
NexTier Consortium	0029756582	Arkansas	\$ 32,255,788.20	10,739
NexTier Consortium	0029756582	Georgia	\$ 161,124.00	281
NexTier Consortium	0029756582	Illinois	\$ 2,646,496.40	815
NexTier Consortium	0029756582	Louisiana	\$ 1,710,200.30	1,639
NexTier Consortium	0029756582	Michigan	\$ 627,072.00	537
NexTier Consortium	0029756582	Mississippi	\$ 45,169,908.90	11,693
NexTier Consortium	0029756582	Missouri	\$ 2,108,576.90	2,011
NexTier Consortium	0029756582	Ohio	\$ 1,081,309.10	7,568
NexTier Consortium	0029756582	Oregon	\$ 11,152,903.10	1,762
NexTier Consortium	0029756582	Pennsylvania	\$ 5,105,375.70	4,460
NexTier Consortium	0029756582	Tennessee	\$ 9,648,243.20	12,895
NexTier Consortium	0029756582	Texas	\$ 3,276,899.00	14,498
NexTier Consortium	0029756582	Virginia	\$ 9,975,489.60	7,595

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### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
NMSURF, Inc.	0018795427	New Mexico	\$ 26,964.00	212
Northeast Missouri Rural Telephone Company	0004337044	Missouri	\$ 60,126.00	7
Northern Arapaho Tribal Industries	0020993077	Wyoming	\$ 7,799,035.00	2,408
Nova Cablevision, Inc	0004962015	Illinois	\$ 785,400.00	155
NRTC Phase I RDOF Consortium	0018539916	Alabama	\$ 169,652.90	3,042
NRTC Phase I RDOF Consortium	0018539916	Georgia	\$ 9,925,188.20	7,420
NRTC Phase I RDOF Consortium	0018539916	Indiana	\$ 19,791,000.70	30,318
NRTC Phase I RDOF Consortium	0018539916	lowa	\$ 356,440.10	305
NRTC Phase I RDOF Consortium	0018539916	Louisiana	\$ 1,283,546.30	652
NRTC Phase I RDOF Consortium	0018539916	Michigan	\$ 59,402,901.70	44,534
NRTC Phase I RDOF Consortium	0018539916	Mississippi	\$ 32,399,695.30	14,222
NRTC Phase I RDOF Consortium	0018539916	Missouri	\$ 1,682,687.60	644
NRTC Phase I RDOF Consortium	0018539916	New Hampshire	\$ 6,884,633.60	7,663
NRTC Phase I RDOF Consortium	0018539916	Oregon	\$ 2,210,256.20	1,720
NRTC Phase I RDOF Consortium	0018539916	South Carolina	\$ 45,666.00	34
NRTC Phase I RDOF Consortium	0018539916	Vermont	\$ 9,559,117.70	6,875
NRTC Phase I RDOF Consortium	0018539916	Virginia	\$ 11,878,740.80	7,670
NRTC Phase I RDOF Consortium	0018539916	Washington	\$ 1,125,151.10	236

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### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
NTS Communications, LLC	0004266938	Texas	\$ 8,923.00	13
One Ring Networks, Inc	0027986132	California	\$ 68,385.00	1,170
One Ring Networks, Inc	0027986132	Georgia	\$ 60,102.50	810
One Ring Networks, Inc	0027986132	Maryland	\$ 9,227.50	81
Palmetto Telephone Communications, LLC	0003741386	South Carolina	\$ 570,024.00	264
Paul Bunyan Rural Telephone Cooperative	0002644953	Minnesota	\$ 16,307,892.10	5,088
Pembroke Telephone Company, Inc.	0003715885	Georgia	\$ 1,053,063.00	601
Peoples Communication, LLC.	0004943221	Texas	\$ 4,140.00	4
Peoples Telecom, LLC	0001792829	Kentucky	\$ 5,668,121.40	2,431
Pine Belt Communications, Inc.	0001754183	Alabama	\$ 11,126,003.10	4,220
Pine Cellular Phones, Inc.	0012882643	Oklahoma	\$ 2,303,742.10	2,459
Pinpoint Bidding Coalition	0001566983	Nebraska	\$ 31,254.00	32
Pioneer Long Distance, Inc.	0003728615	Oklahoma	\$ 50,994.00	1,346
Pioneer Wireless, Inc	0011283405	Maine	\$ 5,543,142.00	1,638
Plains Internet, LLC	0025360173	Kansas	\$ 9,834.00	3
Plains Internet, LLC	0025360173	Texas	\$ 4,074.00	4
Plains Internet, LLC	0025360173	Wyoming	\$ 331,716.00	243

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### Winning Bidder Summary

(Sorted by Bidder Name)



			Assigned Support over 10	Number of Locations
Bidder	FRN	State	Years	Assigned
Plateau Telecommunications, Incorporated	0003800570	New Mexico	\$ 3,150.00	2
Point Broadband Fiber Holding, LLC	0028957306	Alabama	\$ 51,040,733.50	21,818
Point Broadband Fiber Holding, LLC	0028957306	Georgia	\$ 4,241,074.70	2,000
Point Broadband Fiber Holding, LLC	0028957306	Michigan	\$ 11,429,098.90	5,918
Point Broadband Fiber Holding, LLC	0028957306	New York	\$ 6,559,460.00	2,568
Point Broadband Fiber Holding, LLC	0028957306	Virginia	\$ 5,144,046.00	2,168
Prospero Broadband Consortium	0029700937	Arkansas	\$ 50,921,578.70	36,969
Prospero Broadband Consortium	0029700937	Mississippi	\$ 42,351,227.10	14,333
Prospero Broadband Consortium	0029700937	Tennessee	\$ 7,093,203.00	10,497
PVT NetWorks, Inc.	0001612555	New Mexico	\$ 12,039.00	38
QCOL, Inc.	0019663095	Pennsylvania	\$ 235,146.00	88
RC Technologies	0003728680	South Dakota	\$ 263,796.00	118
RDOF USA Consortium	0029740594	Alabama	\$ 73,217,003.70	36,248
RDOF USA Consortium	0029740594	California	\$ 819,773.20	1,552
RDOF USA Consortium	0029740594	Kentucky	\$ 57,041.00	60
RDOF USA Consortium	0029740594	Mississippi	\$ 32,487,629.80	15,341
RDOF USA Consortium	0029740594	Tennessee	\$ 5,462,575.00	10,629
Redzone Wireless, LLC	0026369231	Maine	\$ 507,752.00	755

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### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
Reedsburg Utility Commission	0005221866	Wisconsin	\$ 6,439,594.10	4,488
Reservation Telephone Cooperative	0002477743	North Dakota	\$ 337,080.00	73
Resound Networks, LLC	0024535437	Arizona	\$ 16,495,471.10	42,847
Resound Networks, LLC	0024535437	Arkansas	\$ 60,111,774.60	26,119
Resound Networks, LLC	0024535437	Colorado	\$ 29,530,678.10	11,797
Resound Networks, LLC	0024535437	Kansas	\$ 33,039,420.70	16,922
Resound Networks, LLC	0024535437	New Mexico	\$ 59,171,497.60	19,500
Resound Networks, LLC	0024535437	Oklahoma	\$ 17,889,694.40	19,109
Resound Networks, LLC	0024535437	Texas	\$ 94,443,072.40	82,945
RHMD, LLC	0021036439	Georgia	\$ 18,303,843.20	6,943
Rivers High Group	0002721157	Wisconsin	\$ 3,540,398.10	1,315
Roseau Electric Cooperative, Inc.	0009568379	Minnesota	\$ 1,228,494.00	266
Rural American Broadband Consortium	0002430510	Georgia	\$ 509,970.60	349
Rural American Broadband Consortium	0002430510	Indiana	\$ 1,186,542.80	565
Rural American Broadband Consortium	0002430510	Missouri	\$ 4,525,266.00	1,410
Rural American Broadband Consortium	0002430510	Montana	\$ 226,116.00	209
Rural American Broadband Consortium	0002430510	Ohio	\$ 364,846.70	412
Rural American Broadband Consortium	0002430510	South Dakota	\$ 1,659,116.00	726

### Winning Bidder Summary

(Sorted by Bidder Name) Date of Report: 12/07/2020 08:17 AM ET



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
Rural Electric Cooperative Consortium	0029719259	Arizona	\$ 18,384,651.20	14,574
Rural Electric Cooperative Consortium	0029719259	Arkansas	\$ 179,437,594.20	73,018
Rural Electric Cooperative Consortium	0029719259	Colorado	\$ 83,179,164.60	25,255
Rural Electric Cooperative Consortium	0029719259	Florida	\$ 82,504,050.40	62,480
Rural Electric Cooperative Consortium	0029719259	Georgia	\$ 82,638,074.00	60,184
Rural Electric Cooperative Consortium	0029719259	Illinois	\$ 16,621,874.50	6,487
Rural Electric Cooperative Consortium	0029719259	Indiana	\$ 593,915.10	822
Rural Electric Cooperative Consortium	0029719259	Kentucky	\$ 21,396,303.60	30,398
Rural Electric Cooperative Consortium	0029719259	Louisiana	\$ 113,667,025.30	53,245
Rural Electric Cooperative Consortium	0029719259	Michigan	\$ 18,072,102.90	22,176
Rural Electric Cooperative Consortium	0029719259	Mississippi	\$ 220,576,631.80	89,505
Rural Electric Cooperative Consortium	0029719259	Missouri	\$ 88,238,706.80	44,910
Rural Electric Cooperative Consortium	0029719259	New Mexico	\$ 18,102,076.90	6,292
Rural Electric Cooperative Consortium	0029719259	New York	\$ 8,672,225.90	3,012
Rural Electric Cooperative Consortium	0029719259	Ohio	\$ 1,980,535.00	1,336
Rural Electric Cooperative Consortium	0029719259	Oklahoma	\$ 42,248,692.80	47,552
Rural Electric Cooperative Consortium	0029719259	Oregon	\$ 41,613,794.00	9,928
Rural Electric Cooperative Consortium	0029719259	South Carolina	\$ 876,151.20	2,213

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### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
Rural Electric Cooperative Consortium	0029719259	Tennessee	\$ 16,032,342.90	19,777
Rural Electric Cooperative Consortium	0029719259	Texas	\$ 4,222,892.50	9,071
Rural Electric Cooperative Consortium	0029719259	Virginia	\$ 45,320,113.40	36,203
Rural Electric Cooperative Consortium	0029719259	Wisconsin	\$ 17,034.00	38
Safelink Internet LLC	0016179855	Nevada	\$ 1,197,661.50	2,728
Sandhill Telephone Cooperative, Inc.	0001886464	South Carolina	\$ 6,396.00	1
Savage Communications	0004069167	Minnesota	\$ 6,090,479.10	4,541
Scott County Telephone Cooperative, Inc.	0002069862	Tennessee	\$ 339,393.00	1,926
Scott County Telephone Cooperative, Inc.	0002069862	Virginia	\$ 416,448.60	480
Segnem Egere Consortium	0029760014	Arkansas	\$ 6,485,973.90	3,335
Segnem Egere Consortium	0029760014	Louisiana	\$ 142,323,296.80	52,430
Segnem Egere Consortium	0029760014	Mississippi	\$ 4,045,170.00	1,622
Shenandoah Cable Television, LLC	0021657853	Virginia	\$ 4,967,749.50	8,223
Shenandoah Cable Television, LLC	0021657853	West Virginia	\$ 91,867.00	419
Siuslaw Broadband, LLC dba Hyak Technologies	0020535944	Oregon	\$ 1,611,684.90	554
Skywave Wireless, Inc.	0021644448	Nebraska	\$ 57,660.00	12

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### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
SLIC Network Solutions, Inc.	0011412129	New York	\$ 978,722.00	3,660
Socket Telecom, LLC	0008515595	Missouri	\$ 232,768.80	393
Somerset Telephone Co., Inc.	0002720977	Wisconsin	\$ 669,564.00	1,208
South Arkansas Telephone Company	0001730142	Arkansas	\$ 11,387,245.50	5,093
Space Exploration Technologies Corp.	0026043968	Alabama	\$ 54,680,526.60	36,554
Space Exploration Technologies Corp.	0026043968	Arkansas	\$ 12,383,305.50	17,725
Space Exploration Technologies Corp.	0026043968	California	\$ 5,746,960.80	6,297
Space Exploration Technologies Corp.	0026043968	Colorado	\$ 39,752,936.50	19,176
Space Exploration Technologies Corp.	0026043968	Connecticut	\$ 3,890,305.00	2,819
Space Exploration Technologies Corp.	0026043968	Florida	\$ 33,630,822.60	34,757
Space Exploration Technologies Corp.	0026043968	Georgia	\$ 27,614,882.00	22,961
Space Exploration Technologies Corp.	0026043968	Hawaii	\$ 427,200.00	32
Space Exploration Technologies Corp.	0026043968	Idaho	\$ 54,543,468.90	26,717
Space Exploration Technologies Corp.	0026043968	Illinois	\$ 8,325,104.00	12,478
Space Exploration Technologies Corp.	0026043968	Kentucky	\$ 8,483,592.90	6,696
Space Exploration Technologies Corp.	0026043968	Louisiana	\$ 26,558,634.90	29,171
Space Exploration Technologies Corp.	0026043968	Maine	\$ 34,057,837.30	13,849
Space Exploration Technologies Corp.	0026043968	Maryland	\$ 4,060,771.30	5,413

### Winning Bidder Summary

(Sorted by Bidder Name) Date of Report: 12/07/2020 08:17 AM ET



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
Space Exploration Technologies Corp.	0026043968	Massachusetts	\$ 10,992,153.70	11,136
Space Exploration Technologies Corp.	0026043968	Michigan	\$ 9,852,045.00	8,079
Space Exploration Technologies Corp.	0026043968	Minnesota	\$ 8,424,807.60	7,529
Space Exploration Technologies Corp.	0026043968	Mississippi	\$ 44,019,661.30	38,956
Space Exploration Technologies Corp.	0026043968	Montana	\$ 72,723,246.20	29,478
Space Exploration Technologies Corp.	0026043968	Nevada	\$ 3,858,555.70	2,976
Space Exploration Technologies Corp.	0026043968	New Hampshire	\$ 8,871,460.00	4,389
Space Exploration Technologies Corp.	0026043968	New Jersey	\$ 10,739,474.00	8,686
Space Exploration Technologies Corp.	0026043968	New Mexico	\$ 25,635,954.90	19,721
Space Exploration Technologies Corp.	0026043968	New York	\$ 20,909,624.30	13,729
Space Exploration Technologies Corp.	0026043968	North Carolina	\$ 17,422,993.10	19,552
Space Exploration Technologies Corp.	0026043968	Oregon	\$ 57,897,559.60	35,653
Space Exploration Technologies Corp.	0026043968	Pennsylvania	\$ 63,065,275.00	59,200
Space Exploration Technologies Corp.	0026043968	South Carolina	\$ 6,163,912.70	4,287
Space Exploration Technologies Corp.	0026043968	Tennessee	\$ 12,361,515.80	11,306
Space Exploration Technologies Corp.	0026043968	Utah	\$ 20,961,877.00	8,630
Space Exploration Technologies Corp.	0026043968	Vermont	\$ 3,908,075.00	2,247
Space Exploration Technologies Corp.	0026043968	Virginia	\$ 62,390,792.80	53,640

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### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	EDN	State	Assigned Support over 10	Number of Locations
	FRN	State	Years	Assigned
Space Exploration Technologies Corp.	0026043968	Washington	\$ 80,379,119.90	52,086
Space Exploration Technologies Corp.	0026043968	West Virginia	\$ 13,822,221.30	9,337
Space Exploration Technologies Corp.	0026043968	Wyoming	\$ 16,952,965.20	7,663
St Paul Cooperative Telephone Association	0004979555	Oregon	\$ 190,908.00	39
St. John Telco	0004528410	Washington	\$ 7,116,876.00	1,057
Talkie Communications, Inc.	0024272841	Delaware	\$ 13,300,968.00	7,749
Talkie Communications, Inc.	0024272841	Maryland	\$ 43,764,042.20	31,349
Taylor Telephone Coop., Inc. dba Taylor Telecom	0004924478	Texas	\$ 5,466.00	2
Tennessee Cooperative Group Consortium	0029742053	Illinois	\$ 860,082.00	268
Tennessee Cooperative Group Consortium	0029742053	Kentucky	\$ 3,253,445.10	3,957
Tennessee Cooperative Group Consortium	0029742053	Tennessee	\$ 1,867,989.80	3,400
Terral Telephone Company	0004320412	Oklahoma	\$ 716,381.20	2,299
TruVista Communications, Inc.	0003707775	Georgia	\$ 2,059,050.80	2,778
Unified Communications Inc.	0023896962	Texas	\$ 1,604.00	17
Union Telephone Company	0001630201	Wyoming	\$ 1,264,770.00	157

Auction ID: 904

### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State	Assigned Support over 10 Years	Number of Locations Assigned
		Oluit	Tours	Assigned
Visionary Communications, Inc.	0018092593	Colorado	\$ 396,465.80	986
Visionary Communications, Inc.	0018092593	Wyoming	\$ 4,053,798.60	3,198
W. T. Services, Inc.	0001655125	Texas	\$ 8,785.70	177
WC Fiber, LLC	0024824443	South Carolina	\$ 98,189.50	945
Wikstrom Telephone Company	0004319372	Minnesota	\$ 983,637.00	228
Wildstar	0029765443	Florida	\$ 1,790.00	21
Wilkes Telephone Membership Corporation	0003718426	North Carolina	\$ 1,304,889.80	2,715
Wilkes Telephone Membership Corporation	0003718426	Virginia	\$ 44,750,453.60	37,155
Windstream Services LLC, Debtor-In-Possession	0028299675	Alabama	\$ 28,417,716.50	10,193
Windstream Services LLC, Debtor-In-Possession	0028299675	Arkansas	\$ 56,934,478.20	19,172
Windstream Services LLC, Debtor-In-Possession	0028299675	Florida	\$ 40,763,866.10	19,937
Windstream Services LLC, Debtor-In-Possession	0028299675	Georgia	\$ 147,345,052.70	48,208
Windstream Services LLC, Debtor-In-Possession	0028299675	Iowa	\$ 5,355,920.50	2,472

Auction ID: 904

### Winning Bidder Summary

(Sorted by Bidder Name)



			Assigned Support over 10	Number of Locations
Bidder	FRN	State	Years	Assigned
Windstream Services LLC, Debtor-In-Possession	0028299675	Kentucky	\$ 43,003,810.90	15,787
Windstream Services LLC, Debtor-In-Possession	0028299675	Minnesota	\$ 6,548,964.10	2,899
Windstream Services LLC, Debtor-In-Possession	0028299675	Mississippi	\$ 12,638,681.00	5,733
Windstream Services LLC, Debtor-In-Possession	0028299675	Missouri	\$ 3,078,402.40	1,342
Windstream Services LLC, Debtor-In-Possession	0028299675	Nebraska	\$ 579,530.00	195
Windstream Services LLC, Debtor-In-Possession	0028299675	New Mexico	\$ 15,516,006.80	5,252
Windstream Services LLC, Debtor-In-Possession	0028299675	New York	\$ 2,302,961.00	748
Windstream Services LLC, Debtor-In-Possession	0028299675	North Carolina	\$ 4,187,143.00	2,159
Windstream Services LLC, Debtor-In-Possession	0028299675	Ohio	\$ 1,504,808.00	857
Windstream Services LLC, Debtor-In-Possession	0028299675	Oklahoma	\$ 1,600,807.00	1,284
Windstream Services LLC, Debtor-In-Possession	0028299675	Pennsylvania	\$ 148,746,180.70	53,846

Auction ID: 904

### Winning Bidder Summary

(Sorted by Bidder Name)



			Assigned Support over 10	Number of Locations
Bidder	FRN	State	Years	Assigned
Windstream Services LLC, Debtor-In-Possession	0028299675	South Carolina	\$ 312,153.00	152
Windstream Services LLC, Debtor-In-Possession	0028299675	Texas	\$ 4,052,297.90	2,331
Winnebago Cooperative Telecom Association	0002590057	lowa	\$ 84,096.10	70
Winnebago Cooperative Telecom Association	0002590057	Minnesota	\$ 20,541.70	178
Wisper-CABO 904 Consortium	0029745213	Arizona	\$ 16,441.10	55
Wisper-CABO 904 Consortium	0029745213	Arkansas	\$ 104,926.00	949
Wisper-CABO 904 Consortium	0029745213	Idaho	\$ 3,387,413.00	1,054
Wisper-CABO 904 Consortium	0029745213	Illinois	\$ 97,504.20	40
Wisper-CABO 904 Consortium	0029745213	Iowa	\$ 8,586.00	12
Wisper-CABO 904 Consortium	0029745213	Louisiana	\$ 18,458.60	62
Wisper-CABO 904 Consortium	0029745213	Minnesota	\$ 1,671.00	19
Wisper-CABO 904 Consortium	0029745213	Missouri	\$ 1,159,205.80	857
Wisper-CABO 904 Consortium	0029745213	Nebraska	\$ 11,256.00	11
Wisper-CABO 904 Consortium	0029745213	New Mexico	\$ 125,532.00	129
Wisper-CABO 904 Consortium	0029745213	North Dakota	\$ 697.60	47
Wisper-CABO 904 Consortium	0029745213	Texas	\$ 37,633.00	214

Auction ID: 904

### Winning Bidder Summary

(Sorted by Bidder Name)



Bidder	FRN	State		Assigned Support over 10 Years	Number of Locations Assigned
Wisper-CABO 904 Consortium	0029745213	Washington		\$ 5,118.00	4
Wood County Telephone Company d/b/a Solarus	0003744141	Wisconsin		\$ 28,848.00	15
Worldwide Technologies, Inc.	0018998831	Missouri		\$ 700,874.20	496
WTC Communications, Inc.	0003766680	Kansas		\$ 40,845.20	174
XIT Telecommunication & Technology	0001650233	Texas		\$ 43,254.50	464
yondoo Broadband LLC	0027576503	Missouri		\$ 54,833.80	110
Yucca Telecommunications Systems, Inc.	0004320362	New Mexico		\$ 26,221.00	19
Zito West Holding, LLC	0027133545	Pennsylvania		\$ 457,596.00	279
			TOTAL	\$ 9,230,688,714.90	5,220,833

Auction ID: 904

### State Results Summary

(Sorted by State)



State	Total Assigned Support over 10 Years	Number of Locations Assigned	Winning Bidders
Alabama	\$ 330,804,827.50	196,460	13
Arizona	\$ 195,847,668.40	129,445	7
Arkansas	\$ 424,243,217.60	200,612	15
California	\$ 695,158,129.10	364,878	15
Colorado	\$ 249,833,709.60	76,216	8
Connecticut	\$ 4,210,411.00	2,899	2
Delaware	\$ 13,302,048.00	7,757	2
District of Columbia	\$ 0.00	0	0
Florida	\$ 191,753,609.90	141,625	11
Georgia	\$ 326,454,112.20	179,455	15
Hawaii	\$ 24,740,782.00	8,081	2
Idaho	\$ 112,489,827.90	40,706	8
Illinois	\$ 378,310,110.70	159,967	19
Indiana	\$ 169,379,964.50	152,983	11
Iowa	\$ 143,892,544.40	53,819	11
Kansas	\$ 62,107,482.70	46,827	12
Kentucky	\$ 148,978,767.20	98,909	11
Louisiana	\$ 342,207,315.20	175,692	13
Maine	\$ 71,175,908.30	27,755	4

Auction ID: 904

### State Results Summary

(Sorted by State)



State	Total Assigned Support over 10 Years	Number of Locations Assigned	Winning Bidders
Maryland	\$ 48,023,869.10	37,761	5
Massachusetts	\$ 32,631,916.40	25,480	2
Michigan	\$ 362,985,055.60	249,263	13
Minnesota	\$ 408,150,745.60	142,841	22
Mississippi	\$ 495,725,799.60	218,990	12
Missouri	\$ 346,297,660.20	199,211	17
Montana	\$ 125,815,439.70	45,984	6
Nebraska	\$ 60,377,536.80	43,435	10
Nevada	\$ 63,536,610.90	30,584	5
New Hampshire	\$ 25,257,660.70	17,740	4
New Jersey	\$ 10,739,474.00	8,686	1
New Mexico	\$ 165,209,718.60	64,170	18
New York	\$ 99,891,715.70	46,647	10
North Carolina	\$ 166,580,441.70	155,137	9
North Dakota	\$ 20,824,521.40	2,780	8
Northern Mariana Islands	\$ 3,706,235.00	530	1
Ohio	\$ 170,038,205.10	191,093	11
Oklahoma	\$ 154,556,450.80	126,153	13
Oregon	\$ 212,027,091.20	81,634	10

Auction ID: 904

### State Results Summary

(Sorted by State)

#### Date of Report: 12/07/2020 08:17 AM ET



State	Total Assigned Support over 10 Years	Number of Locations Assigned	Winning Bidders
Pennsylvania	\$ 368,743,200.30	184,505	13
Rhode Island	\$ 1,273,784.00	3,678	1
South Carolina	\$ 121,245,987.00	108,833	9
South Dakota	\$ 52,285,517.00	10,051	6
Tennessee	\$ 148,625,826.20	155,220	11
Texas	\$ 362,662,934.10	310,962	22
Utah	\$ 31,384,525.70	10,373	3
Vermont	\$ 32,533,635.30	19,330	4
Virginia	\$ 238,644,933.90	186,475	16
Washington	\$ 222,768,532.70	100,422	9
West Virginia	\$ 362,066,660.20	119,267	9
Wisconsin	\$ 373,715,051.20	240,546	14
Wyoming	\$ 57,471,543.00	18,966	11

TOTAL \$ 9,230,688,714.90

5,220,833

# Exhibit 2

NextLink Internet Management Team

## Leadership Team Biographies

Management's experience combines large organization (e.g., HCA Healthcare, KPMG, Goldman Sachs, IBM, and Ernst & Young) and entrepreneurial, high growth company experience.

#### Bill Baker Chief Executive Officer

- Bill co-founded Nextlink in 2012
- He actively directs the operational and growth strategy, manages all aspects of the day-to-day operations, and sits on the boards of four other companies
- Prior to Nextlink, Bill was a Senior Partner in KPMG's Deal Advisory practice, served in management roles at startups, and was in corporate development at a Fortune 100 company
- Bill earned a BBA in Accounting and an MBA in Finance from Baylor University, and is a licensed CPA in the state of Texas

#### Eric Pyland Chief Financial Officer

- Eric joined Nextlink in 2018 as CFO
- He is responsible for the overall financial strategy while overseeing the accounting and treasury functions
- Prior to Nextlink, Eric spent 15 years with Goldman Sachs Group in a variety of leadership roles
- Eric also worked in the audit and M&A advisory practices at KPMG
- Eric earned a BS in Accounting from the University of Texas at Dallas and is a licensed CPA in the state of Texas

#### Seth Anderson Chief Operating Officer

- Seth joined Nextlink in 2019 as COO
- He oversees the deployment and maintenance of the Nextlink network and customer-facing operations, and is critical to providing high quality service
- Prior to Nextlink, Seth spent 20 years in the fixed wireless industry focused on deployment and maintenance of large-scale wireless network and operations
- Seth earned a degree from Weber State University and completed a CCNA course at Salt Lake Community College

#### Cameron Kilton Chief Technology Officer

- Cameron joined Nextlink in 2020 as CTO
- He has experience designing, building, and operating wireless broadband, cellular, AMI, and fiberoptic networks
- Prior to Nextlink, Cameron was Director of Sales at Alpha Wireless and Director of Engineering Services at Baicells Technologies

#### Ted Osborn

# Senior Vice President, Regulatory & Corporate Development

- Ted joined Nextlink in 2019 as the lead executive focused on regulatory & strategic corporate development after serving as the lead consultant to the Company during the CAF II auction
- He is a national expert on rural broadband in U.S. markets
- Prior to Nextlink, Ted worked in communications at IBM and cofounded Mesa Networks, a rural fixed wireless ISP broadband provider
- Ted earned a BS in Economics from Middle Tennessee State University

#### Steve Burks

#### Vice President of Sales and Marketing

- Steve joined Nextlink in 2012 as VP of Sales and Marketing
- He played a key role in the go to market strategy in late 2012 as the company launched its operations
- Prior to Nextlink, Steve spent 25 years in the telecommunications industry focusing on wireless development, sales and operations at Avaya, Lucent Technologies and AT&T Wireless

#### Tim Kappell Director of Finance

- Tim joined Nextlink in 2020 as Director of Finance
- Prior to Nextlink, Tim was a Director in Deal Advisory at KPMG for nearly ten years
- Prior to KPMG, Tim was an audit Manager at Ernst & Young
- Tim earned a BBA in Accounting from The University of Texas at Arlington and a MAcc from the University of Notre Dame

#### Exhibit 3

Certificates of Authority, Good Standing, and Assumed Name from the Minnesota Secretary of State

#### Office of the Minnesota Secretary of State Certificate of Authority

I, Steve Simon, Secretary of State of Minnesota, do certify that: The following business entity has duly complied with the relevant provisions of Minnesota Statutes listed below, and is formed or authorized to do business in Minnesota on and after this date with all the powers, rights and privileges, and subject to the limitations, duties and restrictions, set forth in that chapter.

The business entity is now legally registered under the laws of Minnesota.

Name in Minnesota:	AMG Technology Investment Group, LLC
Name in Home Jurisdiction:	AMG Technology Investment Group, LLC
File Number:	1199711400021
Minnesota Statutes, Chapter:	322C
Home Jurisdiction:	Texas
This certificate has been issued on:	12/11/2020



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Steve Simon Secretary of State State of Minnesota

#### Office of the Minnesota Secretary of State

Foreign Limited Liability Company / Certificate of Authority to Transact Business in Minnesota

Minnesota Statutes, Chapter 322C

This Certificate of Authority has been approved pursuant to *Minnesota Statutes*, Chapter 322C. By filing this Certificate of Authority, the company certifies that it has complied with the organization laws in the jurisdiction of its organization.

LIMITED LIABILITY COMPANY NAME in HOME JURISDICTION:

AMG Technology Investment Group, LLC

LIMITED LIABILITY COMPANY NAME in MINNESOTA:

AMG Technology Investment Group, LLC

HOME JURISDICTION:

Texas

**REGISTERED OFFICE AND AGENT:** 

Name

Address:

C T Corporation System Inc.

1010 Dale Street North Saint Paul MN 55117 USA

PRINCIPAL PLACE of BUSINESS ADDRESS:

95 Parker Oaks Lane Hudson Oaks TX 76087 USA

HOME OFFICE ADDRESS:

95 Parker Oaks Lane Hudson Oaks TX 76087 USA

If you submit an attachment, it will be incorporated into this document. If the attachment conflicts with the information specifically set forth in this document, this document supersedes the data referenced in the attachment.

By typing my name, I, the undersigned, certify that I am signing this document as the person whose signature is required, or as agent of the person(s) whose signature would be required who has authorized me to sign this document on his/her behalf, or in both capacities. I further certify that I have completed all required fields, and that the information in this document is true and correct and in compliance with the applicable chapter of Minnesota Statutes. I understand that by signing this document I am subject to the penalties of perjury as set forth in Section 609.48 as if I had signed this document under oath.

SIGNED BY: Sarah L. Stephens

 $EMAIL \ FOR \ OFFICIAL \ NOTICES: \ sstephens@jsllawfirm.com$ 





#### Work Item 1199711400021 Original File Number 1199711400021

STATE OF MINNESOTA OFFICE OF THE SECRETARY OF STATE FILED 12/11/2020 11:59 PM

Oteve Dimm

Steve Simon Secretary of State



#### Steve Simon Office of Minnesota Secretary of State

#### STATE OF MINNESOTA

12/11/2020

Dear AMG Technology Investment Group, LLC,

Thank you for your business filing with the Office of the Minnesota Secretary of State. Minnesota has a very robust and exciting business community, and our office looks forward to assisting you in the future.

I have included an additional business resource document below that would be a helpful reference for you.

I encourage you to stay connected to our Business Services division by subscribing to receive important announcements and updates. To receive the announcements and updates, <u>visit our online subscribe page</u>.

If our office can be of further assistance, please do not hesitate to contact our Business Services helpdesk at <u>business.services@state.mn.us</u>.

Sincerely,

teve Pimm

Steve Simon Secretary of State State of Minnesota

#### **Business Services Information**

#### From the Office of the Minnesota Secretary of State



Additional Actions and Contacts Now That You Have Completed Your Filing

There may be additional steps needed once your registration has been filed with our office. Please read the information provided below. If you have any questions, please contact our office at 651-296-2803, toll free: 1-877-551-6767, Minnesota Relay 711 or by email at: business.services@state.mn.us, or visit our website: www.sos.state.mn.us.

**Assumed Name:** If you filed a Certificate of Assumed Name or an Amended Certificate of Assumed Name, you must publish it in a "legal newspaper" in the county in which the business is located. You can get a list of those newspapers on our website under Business & Liens, Start a Business, Legal newspapers, and List of Legal Newspapers. You must publish the text of the Certificate or Amended Certificate in two consecutive issues (two days in a row if the newspaper is daily; two weeks in a row if the newspaper is weekly). Your assumed name filing may be invalid if you do not complete this step. Contact the newspaper for further instructions on how to get this published. After publication, the newspaper will provide an affidavit of publication which you should retain in your business records.

In addition, you must file an annual renewal once every calendar year, beginning in the calendar year following your original filing with the Secretary of State. Your Assumed Name will expire if you fail to file your annual renewal. If your Assumed Name has expired, you may get it reinstated (if the name is still available) by filing a renewal for the current year and paying a fee.

**Corporation, Co-op, LLC, LLP or LP:** If you filed a Minnesota, Foreign Business, or Non-Profit Corporation, or a Cooperative, Limited Liability Company, Limited Liability Partnership or Limited Partnership, you must file an annual renewal once every calendar year, beginning in the calendar year following your original filing with the Secretary of State. Your entity will be "statutorily dissolved" (no longer be recognized as existing in Minnesota) if you fail to file your annual renewal. If your entity has been statutorily dissolved, you may have it retroactively reinstated (as long as the name is still available) by filing a renewal for the current year and paying a fee.

In addition to filing an annual renewal, Public Benefit Corporations are required to file an Annual Benefit Report each year before April 1st, covering the 12-month period ending on December 31st of the previous year and pay a fee of \$35 to the secretary of state.

**Name Reservation:** If you filed a Name Reservation, it is valid for twelve months from the date of filing. You may renew it each year for twelve more months by filing another Name Reservation form and paying a fee prior to the date it expires. If your Name Reservation has expired, you may renew it (as long as the name is still available) by filing another Name Reservation form and paying a fee.

**Trademark:** If you filed a Trademark registration, it is valid for 10 years. You may renew it for another 10 years by filing a renewal form and paying a fee during the 6 months prior to the date it expires.

Agricultural Land: Entities that own, lease, or have any financial interest in agricultural land or land capable of being farmed must register with the Department of Agriculture.

**Online Services are available with the Office of the Secretary of State.** Order business certificates, business copies, or file business filings online using credit card for payment. Visit our website: www.sos.state.mn.us



The Office of the Secretary of State does not provide legal or business advice. This information is presented as a convenience for our customers. The Office does not guarantee the services provided by the listed organizations. This page does not list all requirements for a newly registered business. Please consult your own legal or business advisor for information and advice about your own situation.

#### TAX ID NUMBERS, LICENSING & OTHER BUSINESS RESOURCES

#### INTERNAL REVENUE SERVICE

For Employer ID# Form: 1-800-829-3676 Tel. Assistance for Businesses: 1-800-829-4933 Tel. Assistance for Tax Exempt Organizations: 1-877-829-5500 Website: www.irs.gov

#### DEPARTMENT OF REVENUE

General Info: 651-296-6181 State Tax ID Info: 651-282-5225 or 1-800-657-3605 Website: www.revenue.state.mn.us

DEPARTMENT OF LABOR & INDUSTRY Worker's Comp & General Info: 651-284-5000 Contractor License Info: 651-284-5034 Website: www.doli.state.mn.us

#### DEPARTMENT OF COMMERCE

Licensing of Banks, Credit Unions, Insurance, Real Estate, Securities, etc. Phone: 651-539-1500 Website: www.commerce.state.mn.us

#### DEPARTMENT OF EMPLOYMENT & ECONOMIC DEVELOPMENT (DEED)

MN Unemployment Insurance Program & Unemployment Insurance Employer Account Info: 651-296-3644 Website: www.uimn.org

#### SMALL BUSINESS ASSISTANCE

Publishes "A Guide to Starting a Business in MN" Phone: 651-556-8425 or 1-800-310-8323 Website: www.mnsbao.com

**AFRICAN DEVELOPMENT CENTER OF MINNESOTA** - A community assistance organization. Phone: 612-333-4772 Website: www.adcminnesota.org

**LATINO ECONOMIC DEVELOPMENT CENTER** - A community assistance organization. Phone: 612-724-5332 E-mail: info@ledc-mn.org; Website: www.ledc-mn.org

LEGAL CORPS - Volunteer lawyers for micro-businesses and nonprofits.

Phone: 612-206-0780 Website: www.legalcorps.org

METROPOLITAN ECONOMIC DEVELOPMENT ASSOCIATION (MEDA) - Helps entrepreneurs of color succeed.

Phone: 612-332-6332; Email: info@meda.net; Website: www.meda.net

**MINNESOTA ATTORNEY GENERAL** - Nonprofit and charitable trust information. Phone: 651-296-3353 Website: www.ag.state.mn.us.

**MINNESOTA COUNCIL OF NONPROFITS** - How to start a nonprofit workshops and handbook. Phone: 651-642-1904; Website: www.minnesotanonprofits.org.

MINNESOTA STATE LEGISLATURE - Statutes, laws and rules. Website: www.leg.state.mn.us

**PROPEL NONPROFITS -** Fiscal sponsorship for newer organizations. Phone: 612-249-6700; Website: www.propelnonprofits.org

**SERVICE CORPS OF RETIRED EXECUTIVES (SCORE)** - Counselors to America's small business providing free business advice. Phone: 952-938-4570; Website: www.score.org

**SMALL BUSINESS ASSISTANCE** - Division of the Minnesota Department of Employment & Economic Development (DEED), which publishes "A Guide to Starting a Business in Minnesota" and maintains a directory of license and permit information. Phone: 651-556-8425 or 1-800-310-8323; Website: www.mnsbao.com

UNITED STATES COPYRIGHT OFFICE - Phone: 202-707-3000; Website: www.copyright.gov

UNITED STATES PATENTS & TRADEMARKS - Phone: 1-800-786-9199; Website: www.uspto.gov

UNITED STATES POSTAL SERVICE - Phone: 1-800-275-8777; Website: www.usps.com

**UNITED STATES SMALL BUSINESS ADMINISTRATION** - Small business programs and services. Phone: 1-800-827-5722; Website: www.sba.gov

**VETERANS RESOURCE** - Minnesota Department of Employment and Economic Development. Website: http://www.positivelyminnesota.com/JobSeekers/Veterans/index.aspx

**WOMEN VENTURE** - A nonprofit economic development organization that helps women attain economic self-sufficiency through the creation and growth of profitable and sustainable businesses. Phone: 612-224-9540; Website: <u>www.womenventure.org</u>

#### Office of the Minnesota Secretary of State Certificate of Good Standing

I, Steve Simon, Secretary of State of Minnesota, do certify that: The business entity listed below was filed pursuant to the Minnesota Chapter listed below with the Office of the Secretary of State on the date listed below and that this business entity is registered to do business and is in good standing at the time this certificate is issued.

Name: Date Filed: File Number: Minnesota Statutes, Chapter: Home Jurisdiction: AMG Technology Investment Group, LLC 12/11/2020 1199711400021 322C Texas

This certificate has been issued on:

12/16/2020



Steve Dimm

Steve Simon Secretary of State State of Minnesota

#### Office of the Minnesota Secretary of State

Certificate of Assumed Name

Minnesota Statutes, Chapter 333

The filing of an assumed name does not provide a user with exclusive rights to that name. The filing is required for consumer protection in order to enable customers to be able to identify the true owner of a business.



ASSUMED NAME:

Nextlink Internet

PRINCIPAL PLACE OF BUSINESS: 95 Parker Oaks Lane Hudson Oaks TX 76087 USA

NAMEHOLDER(S):

Name:

Address:

AMG Technology Investment 95 Parker Oaks Lane Hudson Oaks TX 76087 USA Group, LLC

If you submit an attachment, it will be incorporated into this document. If the attachment conflicts with the information specifically set forth in this document, this document supersedes the data referenced in the attachment.

By typing my name, I, the undersigned, certify that I am signing this document as the person whose signature is required, or as agent of the person(s) whose signature would be required who has authorized me to sign this document on his/her behalf, or in both capacities. I further certify that I have completed all required fields, and that the information in this document is true and correct and in compliance with the applicable chapter of Minnesota Statutes. I understand that by signing this document I am subject to the penalties of perjury as set forth in Section 609.48 as if I had signed this document under oath.

SIGNED BY: Sarah L. Stephens

MAILING ADDRESS: 95 Parker Oaks Lane Hudson Oaks TX 76087

EMAIL FOR OFFICIAL NOTICES: sstephens@jsllawfirm.com



#### Work Item 1199717800025 Original File Number 1199717800025

STATE OF MINNESOTA OFFICE OF THE SECRETARY OF STATE FILED 12/11/2020 11:59 PM

Oteve Dimm

Steve Simon Secretary of State



#### Steve Simon Office of Minnesota Secretary of State

#### STATE OF MINNESOTA

12/11/2020

Dear Nextlink Internet,

Thank you for your business filing with the Office of the Minnesota Secretary of State. Minnesota has a very robust and exciting business community, and our office looks forward to assisting you in the future.

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Sincerely,

teve Dimm

Steve Simon Secretary of State State of Minnesota

#### Exhibit 4

#### **Proposed Service Area**

NextLink Internet seeks ETC designation throughout a service area consisting of the census blocks in Minnesota for which the Company has been awarded support in the recent Rural Digital Opportunity Fund auction.

Appended are the following:

- A list of Minnesota census blocks in which NextLink Internet requests ETC designation, identifying the counties and exchanges in which they are located; and
- A map of areas in Minnesota illustrating the locations of the census blocks and the boundaries of the exchanges.

Census Block ID	County	Exchange 1 ID
270634801001000	Jackson	JACKSON, MN
270634801001002	Jackson	JACKSON, MN
270634801001003	Jackson	JACKSON, MN
270634801001004	Jackson	JACKSON, MN
270634801001006	Jackson	JACKSON, MN
270634801001008	Jackson	JACKSON, MN
270634801001009	Jackson	JACKSON, MN
270634801001010	Jackson	JACKSON, MN
270634801001011	Jackson	JACKSON, MN
270634801001012	Jackson	JACKSON, MN
270634801001013	Jackson	JACKSON, MN
270634801001014	Jackson	JACKSON, MN
270634801001015	Jackson	JACKSON, MN
270634801001016	Jackson	JACKSON, MN
270634801001019	Jackson	JACKSON, MN
270634801001021	Jackson	JACKSON, MN
270634801001022	Jackson	JACKSON, MN
270634801001023	Jackson	JACKSON, MN
270634801001024	Jackson	JACKSON, MN
270634801001025	Jackson	JACKSON, MN
270634801001026	Jackson	JACKSON, MN
270634801001027	Jackson	JACKSON, MN
270634801001028	Jackson	JACKSON, MN
270634801001029	Jackson	JACKSON, MN
270634801001030	Jackson	JACKSON, MN
270634801001031	Jackson	JACKSON, MN
270634801001032	Jackson	JACKSON, MN
270634801001034	Jackson	JACKSON, MN
270634801001035	Jackson	JACKSON, MN
270634801001039	Jackson	JACKSON, MN
270634801001040	Jackson	JACKSON, MN
270634801001041	Jackson	JACKSON, MN
270634801001042	Jackson	JACKSON, MN

Exchange 2 ID

Exchange 3 ID

Census Block ID	County	Exchange 1 ID
270634801001047	Jackson	JACKSON, MN
270634801001055	Jackson	JACKSON, MN
270634801001056	Jackson	JACKSON, MN
270634801001057	Jackson	JACKSON, MN
270634801001058	Jackson	JACKSON, MN
270634801001062	Jackson	JACKSON, MN
270634801001063	Jackson	JACKSON, MN
270634801001065	Jackson	JACKSON, MN
270634801001067	Jackson	JACKSON, MN
270634801001068	Jackson	JACKSON, MN
270634801001069	Jackson	JACKSON, MN
270634801001070	Jackson	JACKSON, MN
270634801001071	Jackson	JACKSON, MN
270634801001072	Jackson	JACKSON, MN
270634801001073	Jackson	JACKSON, MN
270634801001074	Jackson	JACKSON, MN
270634801001075	Jackson	JACKSON, MN
270634801001078	Jackson	JACKSON, MN
270634801001079	Jackson	JACKSON, MN
270634801001081	Jackson	JACKSON, MN
270634801001083	Jackson	JACKSON, MN
270634801001084	Jackson	JACKSON, MN
270634801001085	Jackson	JACKSON, MN
270634801001090	Jackson	JACKSON, MN
270634801001091	Jackson	JACKSON, MN
270634801001094	Jackson	JACKSON, MN
270634801001095	Jackson	JACKSON, MN
270634801001097	Jackson	JACKSON, MN
270634801001099	Jackson	JACKSON, MN
270634801001100	Jackson	JACKSON, MN
270634801001101	Jackson	JACKSON, MN
270634801001102	Jackson	JACKSON, MN
270634801001103	Jackson	JACKSON, MN

Exchange 2 ID

Exchange 3 ID

Exchange 4 ID

Census Block ID	County	Exchange 1 ID	Exchange 2 ID	Exchange 3 ID	Exchange 4 ID
270634801001104	Jackson	JACKSON, MN			
270634801001106	Jackson	JACKSON, MN			
270634801001107	Jackson	JACKSON, MN			
270634801001108	Jackson	JACKSON, MN			
270634801001110	Jackson	DUNNELL, MN	JACKSON, MN		
270634801001111	Jackson	JACKSON, MN			
270634801001112	Jackson	JACKSON, MN			
270634801001113	Jackson	JACKSON, MN			
270634801001114	Jackson	JACKSON, MN			
270634801001126	Jackson	JACKSON, MN			
270634801001127	Jackson	JACKSON, MN			
270634801001128	Jackson	JACKSON, MN			
270634801001129	Jackson	DUNNELL, MN	JACKSON, MN		
270634801001130	Jackson	DUNNELL, MN	JACKSON, MN		
270634801001131	Jackson	DUNNELL, MN	JACKSON, MN		
270634801001133	Jackson	JACKSON, MN			
270634801001134	Jackson	JACKSON, MN			
270634801001135	Jackson	JACKSON, MN			
270634801001136	Jackson	JACKSON, MN			
270634801001137	Jackson	JACKSON, MN			
270634801001139	Jackson	JACKSON, MN			
270634801001140	Jackson	JACKSON, MN			
270634801001141	Jackson	JACKSON, MN			
270634801001143	Jackson	JACKSON, MN			
270634801001145	Jackson	JACKSON, MN			
270634801001146	Jackson	JACKSON, MN			
270634801001147	Jackson	DUNNELL, MN	JACKSON, MN		
270634801001148	Jackson	JACKSON, MN			
270634801001149	Jackson	JACKSON, MN			
270634801001150	Jackson	JACKSON, MN	SUPERIOR, IA		
270634801001154	Jackson	JACKSON, MN	SUPERIOR, IA		
270634801001155	Jackson	JACKSON, MN	SUPERIOR, IA		
270634801001156	Jackson	JACKSON, MN			

Census Block ID	County	Exchange 1 ID	Exchange 2 ID	Exchange 3 ID	Exchange 4 ID
270634801001158	Jackson	JACKSON, MN			
270634801001159	Jackson	JACKSON, MN	SUPERIOR, IA		
270634801001160	Jackson	JACKSON, MN			
270634801001161	Jackson	DUNNELL, MN	JACKSON, MN	NORTH ESTHERVILLE, MN	
270634801001162	Jackson	DUNNELL, MN	JACKSON, MN		
270634801001164	Jackson	JACKSON, MN	SUPERIOR, IA		
270634801001165	Jackson	ESTHERVILLE, IA	JACKSON, MN	NORTH ESTHERVILLE, MN	SUPERIOR, IA
270634801001171	Jackson	JACKSON, MN			
270634801001172	Jackson	JACKSON, MN			
270634801001173	Jackson	JACKSON, MN			
270634801002000	Jackson	MOUNTAIN LAKE, MN	ODIN, MN		
270634801002001	Jackson	MOUNTAIN LAKE, MN	ODIN, MN		
270634801002004	Jackson	MOUNTAIN LAKE, MN			
270634801002013	Jackson	WINDOM, MN			
270634801002017	Jackson	MOUNTAIN LAKE, MN			
270634801002022	Jackson	ODIN, MN	TRIMONT, MN		
270634801002024	Jackson	MOUNTAIN LAKE, MN	WINDOM, MN		
270634801002030	Jackson	WINDOM, MN			
270634801002031	Jackson	WINDOM, MN			
270634801002032	Jackson	WINDOM, MN			
270634801002036	Jackson	WINDOM, MN			
270634801002040	Jackson	WINDOM, MN			
270634801002043	Jackson	WINDOM, MN			
270634801002045	Jackson	WINDOM, MN			
270634801002048	Jackson	WINDOM, MN			
270634801002054	Jackson	WINDOM, MN			
270634801002055	Jackson	MOUNTAIN LAKE, MN	WINDOM, MN		
270634801002058	Jackson	MOUNTAIN LAKE, MN	WINDOM, MN		
270634801002060	Jackson	MOUNTAIN LAKE, MN			
270634801002061	Jackson	MOUNTAIN LAKE, MN			
270634801002064	Jackson	TRIMONT, MN			
270634801002066	Jackson	TRIMONT, MN			
270634801002067	Jackson	TRIMONT, MN			

Census Block ID	County	Exchange 1 ID	Exchange 2 ID	Exchange 3 ID	Exchange 4 ID
270634801002070	Jackson	MOUNTAIN LAKE, MN	TRIMONT, MN		
270634801002072	Jackson	JACKSON, MN	MOUNTAIN LAKE, MN	TRIMONT, MN	
270634801002073	Jackson	JACKSON, MN	MOUNTAIN LAKE, MN		
270634801002074	Jackson	JACKSON, MN	MOUNTAIN LAKE, MN	WINDOM, MN	
270634801002076	Jackson	JACKSON, MN	WINDOM, MN		
270634801002082	Jackson	WINDOM, MN			
270634801002087	Jackson	JACKSON, MN	WINDOM, MN		
270634801002089	Jackson	WINDOM, MN			
270634801002090	Jackson	WINDOM, MN			
270634801002091	Jackson	WINDOM, MN			
270634801002093	Jackson	JACKSON, MN	WINDOM, MN		
270634801002097	Jackson	JACKSON, MN	LAKEFIELD, MN	WINDOM, MN	
270634801002098	Jackson	JACKSON, MN	WINDOM, MN		
270634801002102	Jackson	JACKSON, MN			
270634801002103	Jackson	JACKSON, MN			
270634801002104	Jackson	JACKSON, MN			
270634801002105	Jackson	JACKSON, MN			
270634801002109	Jackson	JACKSON, MN			
270634801002110	Jackson	JACKSON, MN			
270634801002115	Jackson	JACKSON, MN			
270634801002116	Jackson	JACKSON, MN			
270634801002117	Jackson	JACKSON, MN			
270634801002118	Jackson	JACKSON, MN			
270634801002119	Jackson	JACKSON, MN			
270634801002121	Jackson	JACKSON, MN			
270634801002124	Jackson	JACKSON, MN	TRIMONT, MN		
270634801002126	Jackson	JACKSON, MN	MOUNTAIN LAKE, MN	TRIMONT, MN	
270634801002137	Jackson	TRIMONT, MN			
270634801002145	Jackson	JACKSON, MN	TRIMONT, MN		
270634801002147	Jackson	JACKSON, MN			
270634801002149	Jackson	JACKSON, MN			
270634801002150	Jackson	JACKSON, MN			
270634801002151	Jackson	JACKSON, MN			

Census Block ID	County	Exchange 1 ID	Exchange 2 ID	Exchange 3 ID	Exchange 4 ID
270634801002155	Jackson	JACKSON, MN			
270634801002156	Jackson	JACKSON, MN			
270634801002159	Jackson	JACKSON, MN	TRIMONT, MN		
270634801002161	Jackson	JACKSON, MN			
270634801002162	Jackson	JACKSON, MN			
270634801002163	Jackson	JACKSON, MN			
270634801002165	Jackson	JACKSON, MN			
270634801002166	Jackson	JACKSON, MN			
270634801002168	Jackson	JACKSON, MN			
270634801002173	Jackson	JACKSON, MN			
270634801002174	Jackson	JACKSON, MN			
270634801002180	Jackson	JACKSON, MN			
270634801002182	Jackson	JACKSON, MN			
270634801002186	Jackson	JACKSON, MN			
270634801002187	Jackson	JACKSON, MN			
270634801002190	Jackson	JACKSON, MN			
270634801002192	Jackson	JACKSON, MN			
270634801002193	Jackson	JACKSON, MN	LAKEFIELD, MN		
270634801002195	Jackson	JACKSON, MN	LAKEFIELD, MN		
270634801002196	Jackson	JACKSON, MN			
270634801002197	Jackson	JACKSON, MN	LAKEFIELD, MN	WINDOM, MN	
270634801002198	Jackson	LAKEFIELD, MN			
270634801002203	Jackson	LAKEFIELD, MN			
270634801002205	Jackson	JACKSON, MN	LAKEFIELD, MN		
270634801002206	Jackson	LAKEFIELD, MN			
270634801002207	Jackson	LAKEFIELD, MN			
270634801002208	Jackson	JACKSON, MN	LAKEFIELD, MN		
270634801002209	Jackson	LAKEFIELD, MN			
270634801002214	Jackson	JACKSON, MN	LAKEFIELD, MN		
270634801002215	Jackson	JACKSON, MN	LAKEFIELD, MN		
270634801002218	Jackson	JACKSON, MN			
270634801002219	Jackson	JACKSON, MN			
270634801002220	Jackson	JACKSON, MN			

Census Block ID	County	Exchange 1 ID	Exchange 2 ID	Exchange 3 ID	Exchange 4 ID
270634801002221	Jackson	JACKSON, MN	LAKEFIELD, MN		
270634801002222	Jackson	JACKSON, MN			
270634801002223	Jackson	JACKSON, MN			
270634801002225	Jackson	JACKSON, MN	LAKEFIELD, MN		
270634801002226	Jackson	JACKSON, MN			
270634801002229	Jackson	JACKSON, MN			
270634801002230	Jackson	JACKSON, MN			
270634801002241	Jackson	JACKSON, MN			
270634801002242	Jackson	JACKSON, MN			
270634801002243	Jackson	JACKSON, MN			
270634801002244	Jackson	JACKSON, MN			
270634801002245	Jackson	JACKSON, MN			
270634801002246	Jackson	JACKSON, MN			
270634801002247	Jackson	JACKSON, MN			
270634801002248	Jackson	JACKSON, MN			
270634801002249	Jackson	JACKSON, MN			
270634801002250	Jackson	JACKSON, MN			
270634801002251	Jackson	JACKSON, MN			
270634801002252	Jackson	JACKSON, MN			
270634801002253	Jackson	JACKSON, MN			
270634801002254	Jackson	JACKSON, MN			
270634801002255	Jackson	JACKSON, MN			
270634801002256	Jackson	JACKSON, MN			
270634801002257	Jackson	JACKSON, MN			
270634801002259	Jackson	JACKSON, MN			
270634801002260	Jackson	JACKSON, MN			
270634801002261	Jackson	JACKSON, MN			
270634801002262	Jackson	JACKSON, MN	SUPERIOR, IA		
270634801002264	Jackson	JACKSON, MN	SPIRIT LAKE, IA		
270634801002265	Jackson	JACKSON, MN			
270634801002266	Jackson	JACKSON, MN			
270634801002267	Jackson	JACKSON, MN			
270634801002268	Jackson	JACKSON, MN			

Census Block ID	County	Exchange 1 ID	Exchange 2 ID	Exchange
270634801002270	Jackson	JACKSON, MN	SPIRIT LAKE, IA	0
270634801002271	Jackson	JACKSON, MN	,	
270634801002272	Jackson	JACKSON, MN		
270634801002275	Jackson	JACKSON, MN		
270634801002277	Jackson	JACKSON, MN		
270634801003013	Jackson	WINDOM, MN		
270634801003026	Jackson	WINDOM, MN		
270634801003027	Jackson	WINDOM, MN		
270634801003032	Jackson	WINDOM, MN		
270634801003033	Jackson	WINDOM, MN		
270634801003034	Jackson	WINDOM, MN		
270634801003035	Jackson	WINDOM, MN		
270634801003049	Jackson	WINDOM, MN		
270634801003050	Jackson	WINDOM, MN		
270634801003051	Jackson	WINDOM, MN		
270634801003052	Jackson	WINDOM, MN		
270634801003053	Jackson	WINDOM, MN		
270634801003054	Jackson	WINDOM, MN		
270634801003055	Jackson	WINDOM, MN		
270634801003057	Jackson	WINDOM, MN		
270634801003058	Jackson	WINDOM, MN		
270634801003059	Jackson	WINDOM, MN		
270634801003060	Jackson	WINDOM, MN		
270634801003063	Jackson	WINDOM, MN		
270634801003064	Jackson	WINDOM, MN		
270634801003065	Jackson	HERON LAKE, MN	WINDOM, MN	
270634801003066	Jackson	HERON LAKE, MN	WINDOM, MN	
270634801003069	Jackson	WINDOM, MN		
270634801003071	Jackson	WINDOM, MN		
270634801003073	Jackson	WINDOM, MN		
270634801003074	Jackson	WINDOM, MN		
270634801003076	Jackson	WINDOM, MN		
270634801003077	Jackson	WINDOM, MN		

Census Block ID	County	Exchange 1 ID	Exchange 2 ID	Exchange 3 ID	Exchange 4 ID
270634801003081	Jackson	LAKEFIELD, MN	WINDOM, MN		
270634801003082	Jackson	WINDOM, MN			
270634801003085	Jackson	LAKEFIELD, MN	WINDOM, MN		
270634801003086	Jackson	LAKEFIELD, MN	WINDOM, MN		
270634801003088	Jackson	WINDOM, MN			
270634801003089	Jackson	WINDOM, MN			
270634801003090	Jackson	HERON LAKE, MN	WINDOM, MN		
270634801003091	Jackson	HERON LAKE, MN	LAKEFIELD, MN	WINDOM, MN	
270634801003093	Jackson	LAKEFIELD, MN			
270634801003094	Jackson	LAKEFIELD, MN			
270634801003096	Jackson	LAKEFIELD, MN			
270634801003097	Jackson	LAKEFIELD, MN			
270634801003098	Jackson	LAKEFIELD, MN			
270634801003099	Jackson	LAKEFIELD, MN	WINDOM, MN		
270634801003100	Jackson	LAKEFIELD, MN	WINDOM, MN		
270634801003101	Jackson	LAKEFIELD, MN	WINDOM, MN		
270634801003102	Jackson	LAKEFIELD, MN	WINDOM, MN		
270634801003103	Jackson	LAKEFIELD, MN			
270634801003104	Jackson	LAKEFIELD, MN			
270634801003106	Jackson	LAKEFIELD, MN			
270634801003107	Jackson	LAKEFIELD, MN			
270634801003108	Jackson	LAKEFIELD, MN			
270634801003111	Jackson	LAKEFIELD, MN			
270634801003112	Jackson	LAKEFIELD, MN			
270634801003113	Jackson	LAKEFIELD, MN			
270634801003114	Jackson	LAKEFIELD, MN			
270634801003115	Jackson	LAKEFIELD, MN	WINDOM, MN		
270634801003116	Jackson	LAKEFIELD, MN			
270634801003117	Jackson	LAKEFIELD, MN			
270634801003120	Jackson	LAKEFIELD, MN			
270634801003121	Jackson	LAKEFIELD, MN			
270634801003122	Jackson	LAKEFIELD, MN			
270634801003123	Jackson	LAKEFIELD, MN			

	Country	Eveloped 1 ID	Fuchanas 2 ID	Fuchanas 2 ID	Fuchanas ( ID
Census Block ID	County	Exchange 1 ID	Exchange 2 ID	Exchange 3 ID	Exchange 4 ID
270634801003128	Jackson	LAKEFIELD, MN			
270634801003130	Jackson	LAKEFIELD, MN			
270634801003131	Jackson	LAKEFIELD, MN			
270634802002023	Jackson	BREWSTER, MN	OKABENA, MN		
270634802002024	Jackson	OKABENA, MN			
270634802002025	Jackson	OKABENA, MN			
270634802002026	Jackson	OKABENA, MN			
270634802002027	Jackson	OKABENA, MN			
270634802002028	Jackson	LAKEFIELD, MN	OKABENA, MN		
270634802002029	Jackson	LAKEFIELD, MN	OKABENA, MN		
270634802002037	Jackson	OKABENA, MN			
270634802002038	Jackson	LAKEFIELD, MN	OKABENA, MN		
270634802002039	Jackson	LAKEFIELD, MN			
270634802002040	Jackson	LAKEFIELD, MN			
270634802002042	Jackson	LAKEFIELD, MN			
270634802002043	Jackson	LAKEFIELD, MN			
270634802002044	Jackson	LAKEFIELD, MN			
270634802002046	Jackson	LAKEFIELD, MN			
270634802002047	Jackson	LAKEFIELD, MN	OKABENA, MN		
270634802002048	Jackson	OKABENA, MN			
270634802002049	Jackson	OKABENA, MN			
270634802002054	Jackson	OKABENA, MN			
270634802002055	Jackson	BREWSTER, MN	OKABENA, MN		
270634802002065	Jackson	LAKEFIELD, MN			
270634802002069	Jackson	OKABENA, MN			
270634802002075	Jackson	LAKEFIELD, MN			
270634802002077	Jackson	LAKEFIELD, MN			
270634802002078	Jackson	LAKEFIELD, MN			
270634802002093	Jackson	OKABENA, MN	ROUND LAKE, MN		
270634802002095	Jackson	OKABENA, MN			
270634802002096	Jackson	OKABENA, MN			
270634802002097	Jackson	LAKEFIELD, MN	OKABENA, MN		
270634802002098	Jackson	OKABENA, MN	ROUND LAKE, MN		

Census Block ID	County	Exchange 1 ID	Exchange 2 ID	Exchange 3 ID
270634802002100	Jackson	OKABENA, MN	ROUND LAKE, MN	
270634802002103	Jackson	ROUND LAKE, MN		
270634802002104	Jackson	ROUND LAKE, MN		
270634802002107	Jackson	BREWSTER, MN	ROUND LAKE, MN	
270634802002118	Jackson	ROUND LAKE, MN		
270634802002122	Jackson	ROUND LAKE, MN		
270634802002123	Jackson	ROUND LAKE, MN		
270634802002125	Jackson	NORTH LAKE PARK, MN	ROUND LAKE, MN	
270634802002126	Jackson	NORTH LAKE PARK, MN	ROUND LAKE, MN	
270634802002127	Jackson	ROUND LAKE, MN		
270634802002128	Jackson	ROUND LAKE, MN		
270634802002134	Jackson	NORTH LAKE PARK, MN	ROUND LAKE, MN	
270634802002135	Jackson	ROUND LAKE, MN		
270634802002138	Jackson	ROUND LAKE, MN		
270634802002139	Jackson	ROUND LAKE, MN		
270634802002141	Jackson	NORTH LAKE PARK, MN	ROUND LAKE, MN	
270634802002142	Jackson	NORTH LAKE PARK, MN		
270634802002145	Jackson	NORTH LAKE PARK, MN	ROUND LAKE, MN	
270634802002146	Jackson	NORTH LAKE PARK, MN	ROUND LAKE, MN	
270634802002148	Jackson	ROUND LAKE, MN		
270634802002150	Jackson	ROUND LAKE, MN		
270634802002151	Jackson	ROUND LAKE, MN		
270634802002152	Jackson	ROUND LAKE, MN		
270634802002154	Jackson	LAKEFIELD, MN		
270634802002158	Jackson	NORTH LAKE PARK, MN		
270634802003002	Jackson	HERON LAKE, MN	WINDOM, MN	
270634802003003	Jackson	HERON LAKE, MN		
270634802003131	Jackson	LAKEFIELD, MN		
270634802003133	Jackson	LAKEFIELD, MN		
270634802003135	Jackson	LAKEFIELD, MN		
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270634803002035	Jackson	LAKEFIELD, MN		

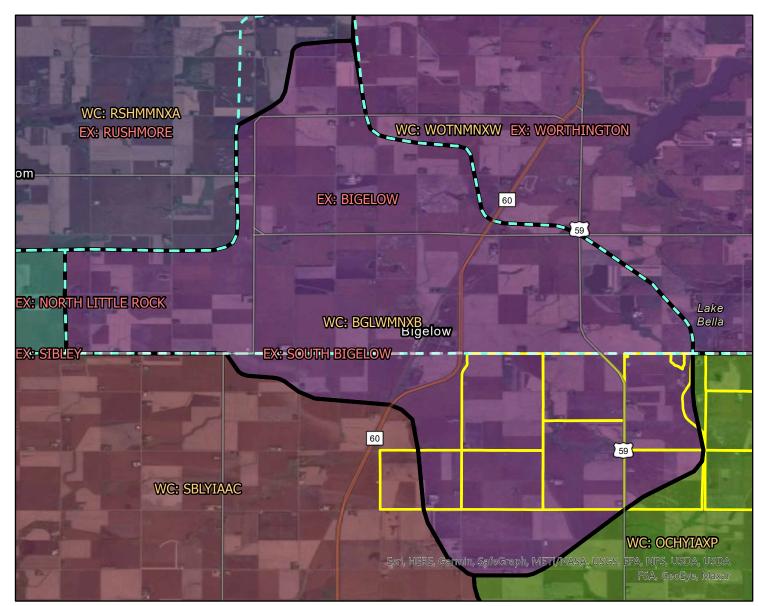
Exchange 4 ID

Census Block ID	County	Exchange 1 ID	Exchange 2 ID	Exchange 3 ID	Exchange 4 ID
271034802004000	Nicollet	NICOLLET, MN			
271034802004017	Nicollet	NICOLLET, MN			
271034802004019	Nicollet	NICOLLET, MN			
271034802004022	Nicollet	NICOLLET, MN			
271034802004024	Nicollet	NEW ULM, MN	NICOLLET, MN		
271034802004025	Nicollet	NEW ULM, MN			
271034802004026	Nicollet	NEW ULM, MN	NICOLLET, MN		
271034802004029	Nicollet	CAMBRIA, MN	NICOLLET, MN		
271034802004033	Nicollet	NICOLLET, MN			
271034802004036	Nicollet	NICOLLET, MN			
271034802004038	Nicollet	NICOLLET, MN			
271034802004039	Nicollet	NICOLLET, MN			
271034802004044	Nicollet	NICOLLET, MN			
271034802004046	Nicollet	NICOLLET, MN			
271034802004047	Nicollet	NICOLLET, MN			
271034802004052	Nicollet	NICOLLET, MN			
271034802004057	Nicollet	CAMBRIA, MN	NICOLLET, MN		
271034802004058	Nicollet	CAMBRIA, MN	NICOLLET, MN		
271034802004059	Nicollet	NEW ULM, MN	NICOLLET, MN		
271034802004062	Nicollet	CAMBRIA, MN	NEW ULM, MN	NICOLLET, MN	
271034802004066	Nicollet	CAMBRIA, MN			

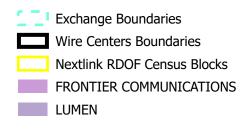
# WIRE CENTER: BGLWMNXB MINNESOTA

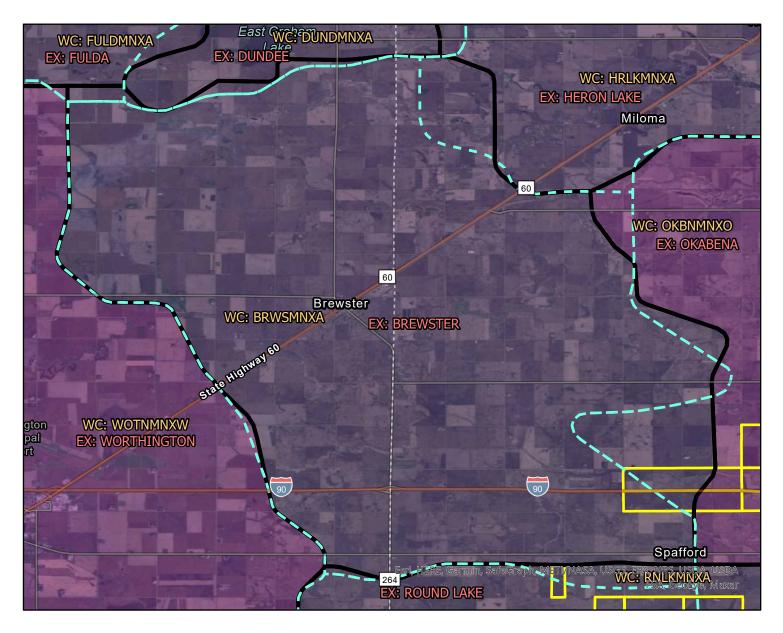
Exchange Boundaries
 Wire Centers Boundaries
 Nextlink RDOF Census Blocks
 FRONTIER COMMUNICATIONS
 HICKORYTECH
 LUMEN
 NORTHERN IOWA TELEPHONE CO
 WINDSTREAM COMMUNICATIONS





## WIRE CENTER: BRWSMNXA MINNESOTA



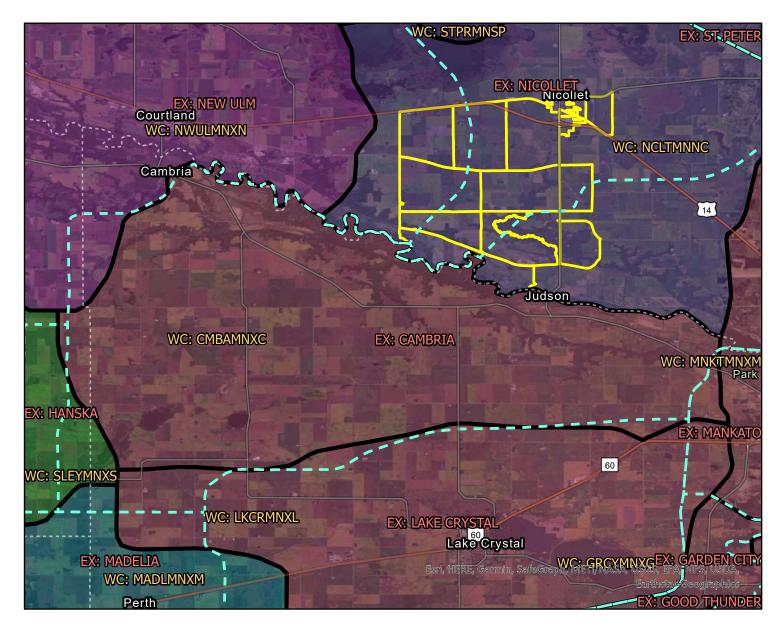




## WIRE CENTER: CMBAMNXC MINNESOTA

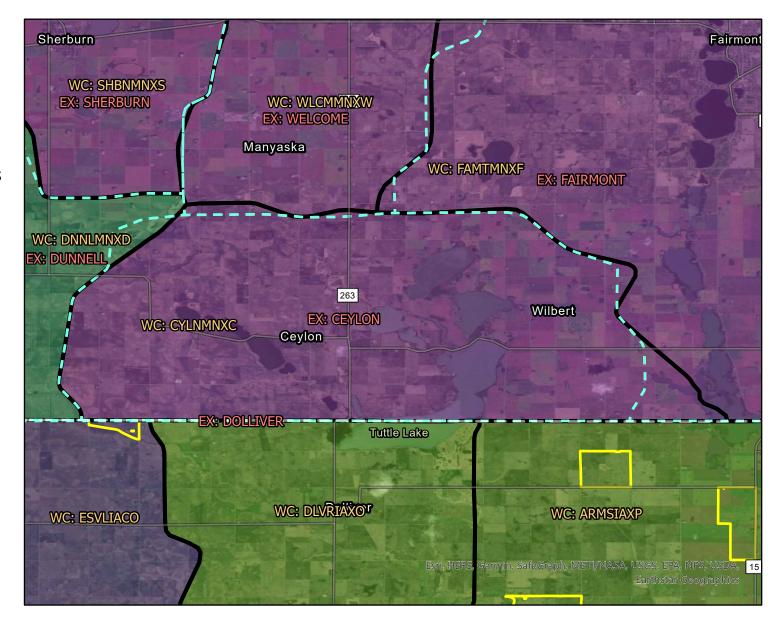
Exchange Boundaries
 Wire Centers Boundaries
 Nextlink RDOF Census Blocks
 CHRISTENSEN COM CO
 HICKORYTECH
 LUMEN
 NEW ULM TELECOM
 SLEEPY EYE TELEPHONE CO.





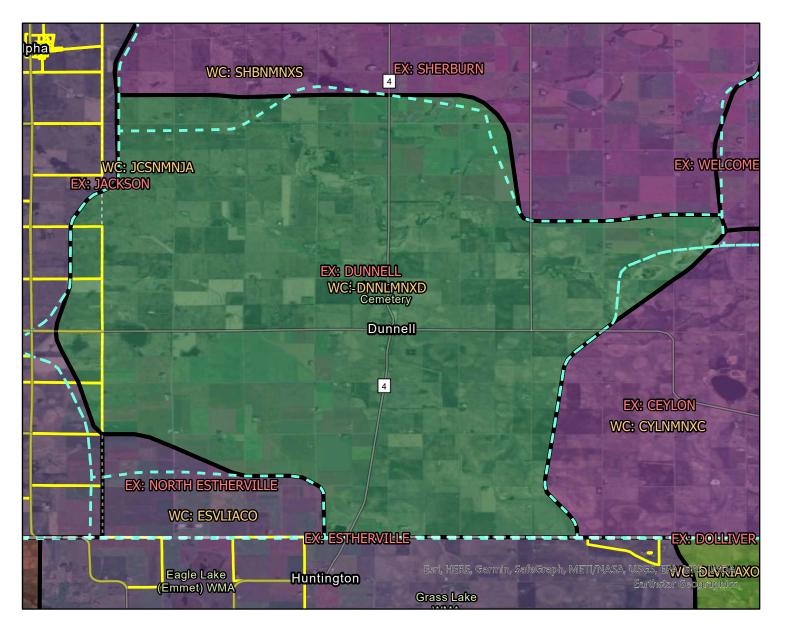
# WIRE CENTER: CYLNMNXC MINNESOTA





# WIRE CENTER: DNNLMNXD MINNESOTA

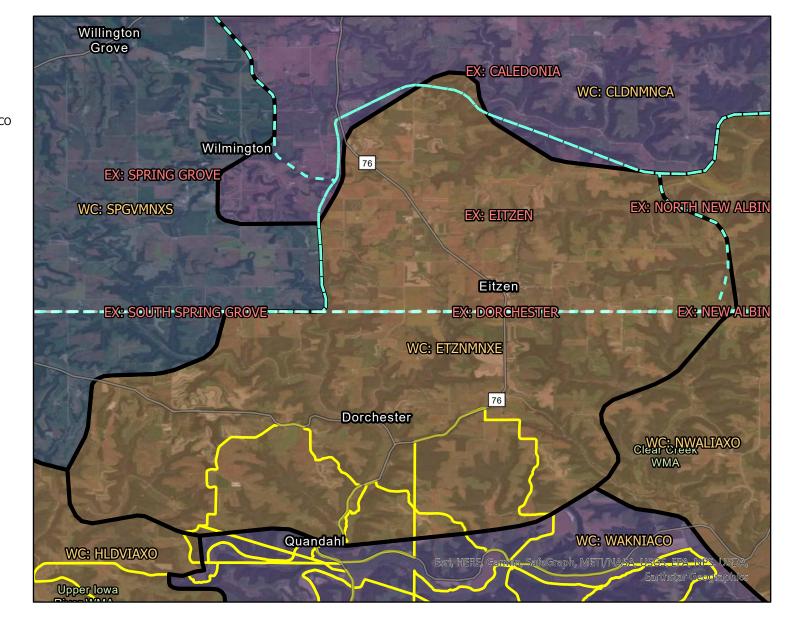
Exchange Boundaries
 Wire Centers Boundaries
 Nextlink RDOF Census Blocks
 DUNNELL TELEPHONE CO.
 FRONTIER COMMUNICATIONS
 LUMEN
 SUPERIOR TELEPHONE COOP
 WINDSTREAM COMMUNICATIONS





# WIRE CENTER: ETZNMNXE MINNESOTA

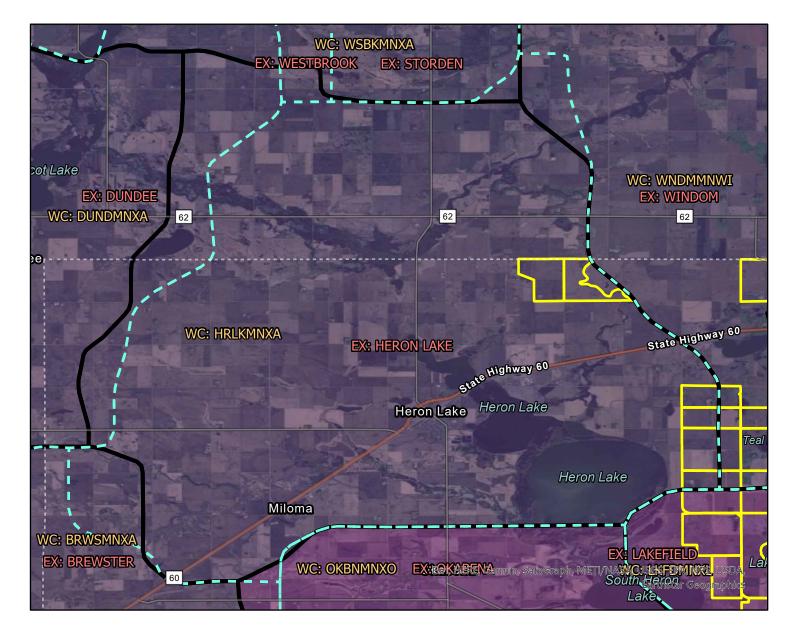
Exchange Boundaries
 Wire Centers Boundaries
 Nextlink RDOF Census Blocks
 ACE COMMUNICATIONS GROUP
 LUMEN
 SPRING GROVE COOPERATIVE TELEPHONE CO





### WIRE CENTER: HRLKMNXA MINNESOTA

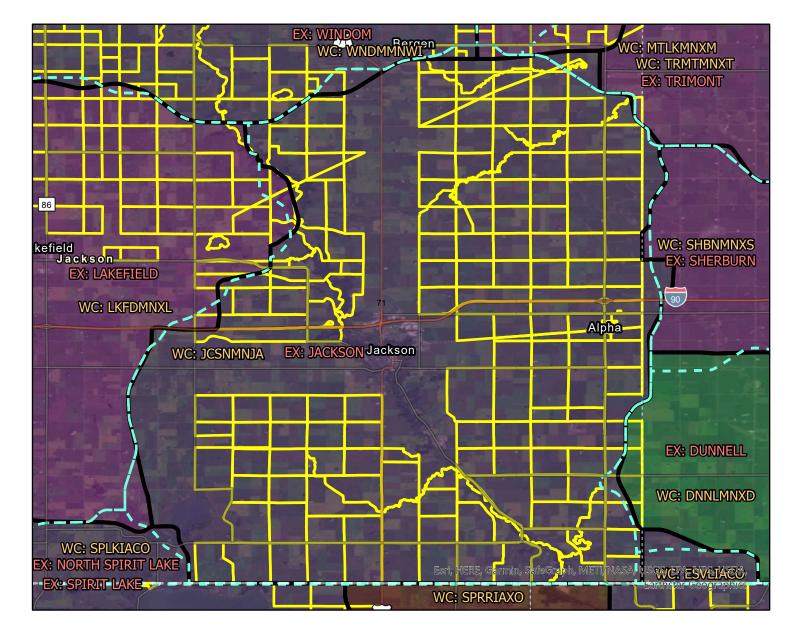
Exchange Boundaries
 Wire Centers Boundaries
 Nextlink RDOF Census Blocks
 FRONTIER COMMUNICATIONS
 LUMEN





## WIRE CENTER: JCSNMNJA MINNESOTA

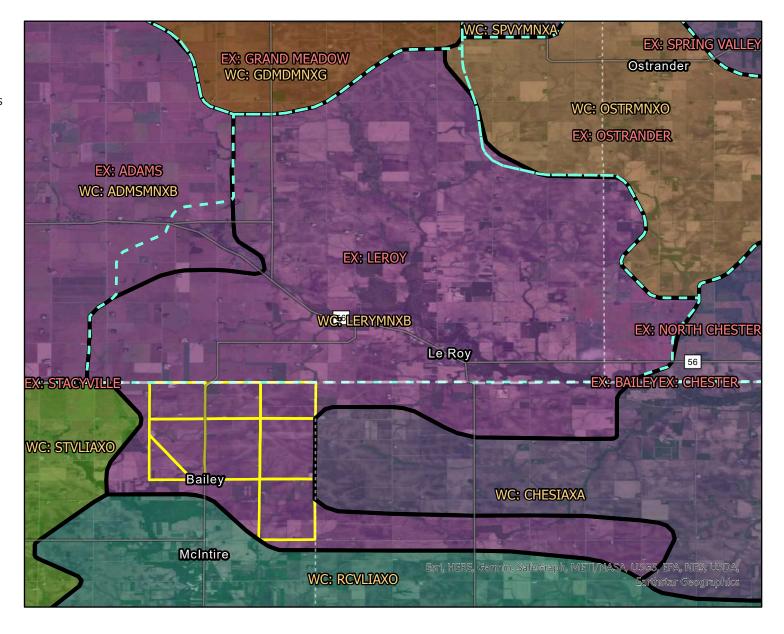
Exchange Boundaries
 Wire Centers Boundaries
 Nextlink RDOF Census Blocks
 DUNNELL TELEPHONE CO.
 FRONTIER COMMUNICATIONS
 LUMEN
 SUPERIOR TELEPHONE COOP





# WIRE CENTER: LERYMNXB MINNESOTA

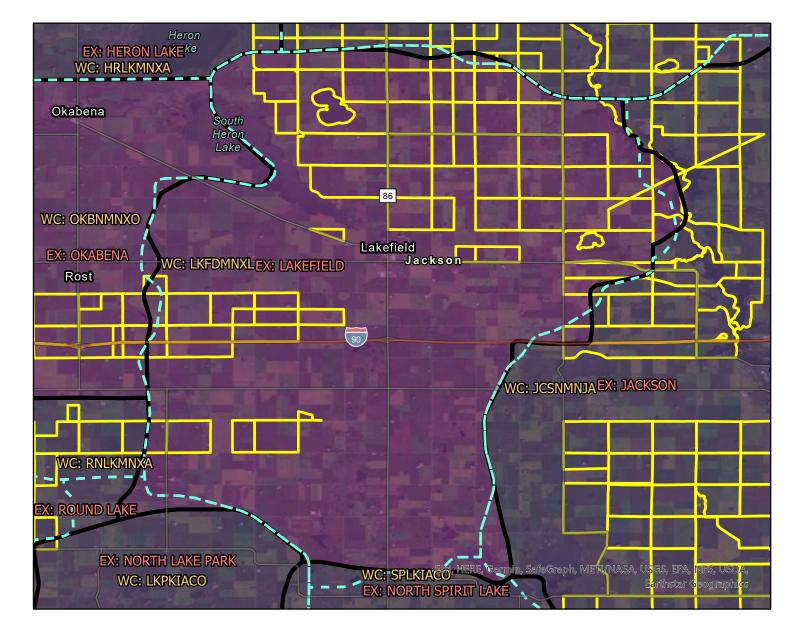


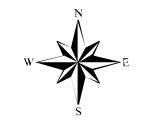




# WIRE CENTER: LKFDMNXL MINNESOTA

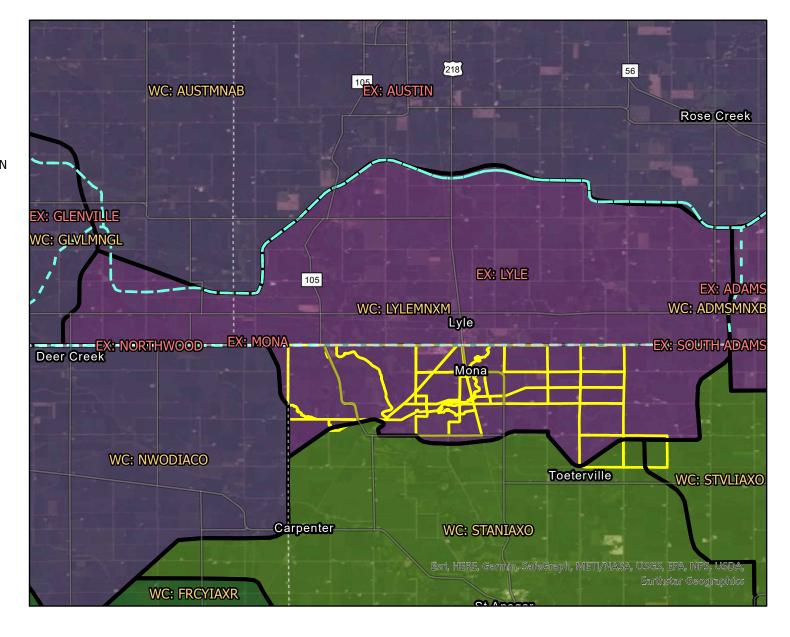
Exchange Boundaries
 Wire Centers Boundaries
 Nextlink RDOF Census Blocks
 FRONTIER COMMUNICATIONS
 LUMEN





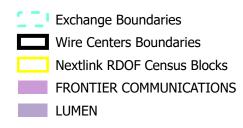
# WIRE CENTER: LYLEMNXM MINNESOTA

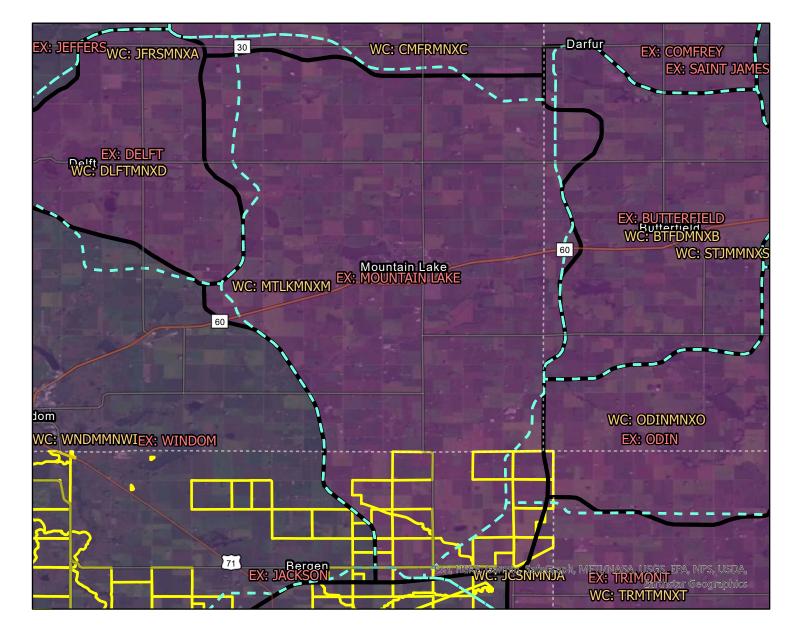
Exchange Boundaries
 Wire Centers Boundaries
 Nextlink RDOF Census Blocks
 FRONTIER COMMUNICATIONS
 LUMEN
 WINDSTREAM COMMUNICATIONS
 WINNEBAGO COOP TELEPHONE ASSN





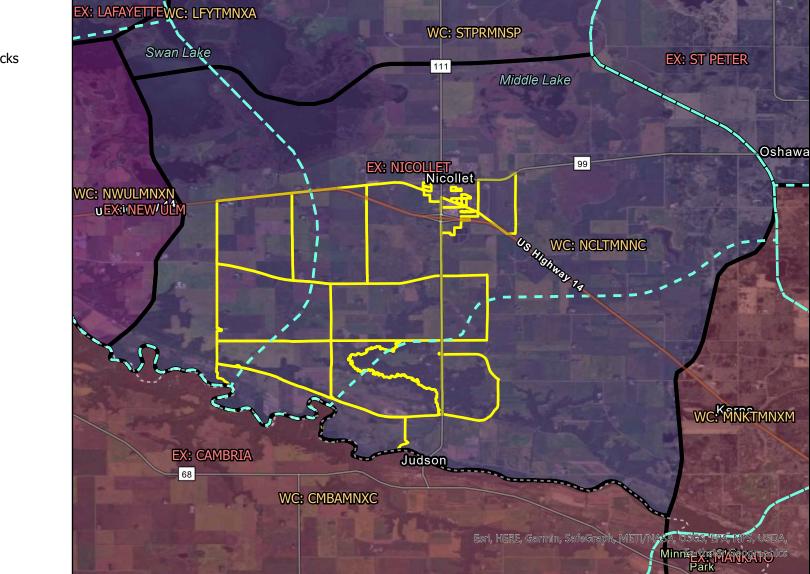
# WIRE CENTER: MTLKMNXM MINNESOTA







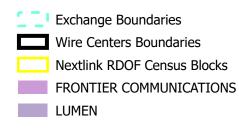
# WIRE CENTER: NCLTMNNC MINNESOTA

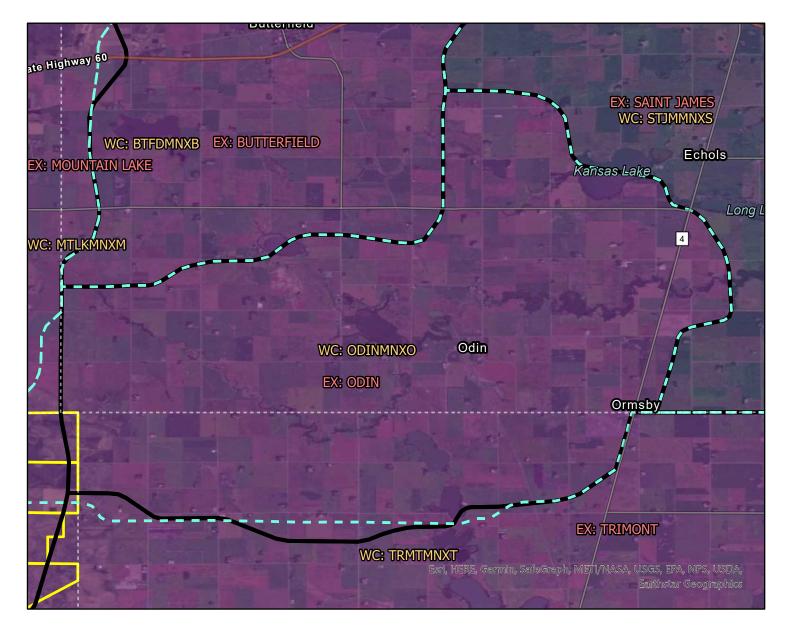


Exchange Boundaries
 Wire Centers Boundaries
 Nextlink RDOF Census Blocks
 HICKORYTECH
 LUMEN
 NEW ULM TELECOM



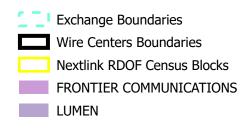
# WIRE CENTER: ODINMNXO MINNESOTA

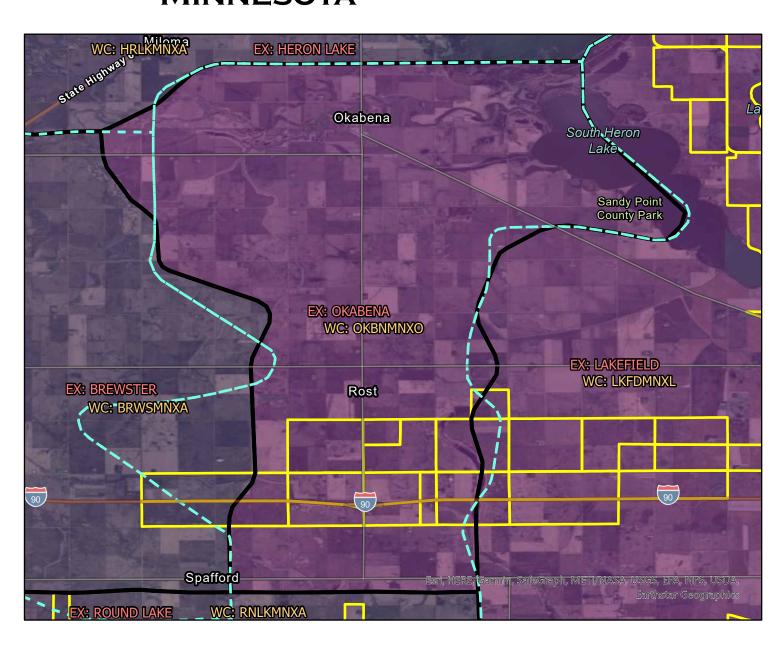






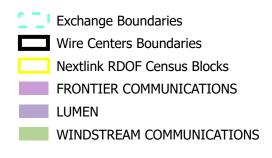
# WIRE CENTER: OKBNMNXO MINNESOTA

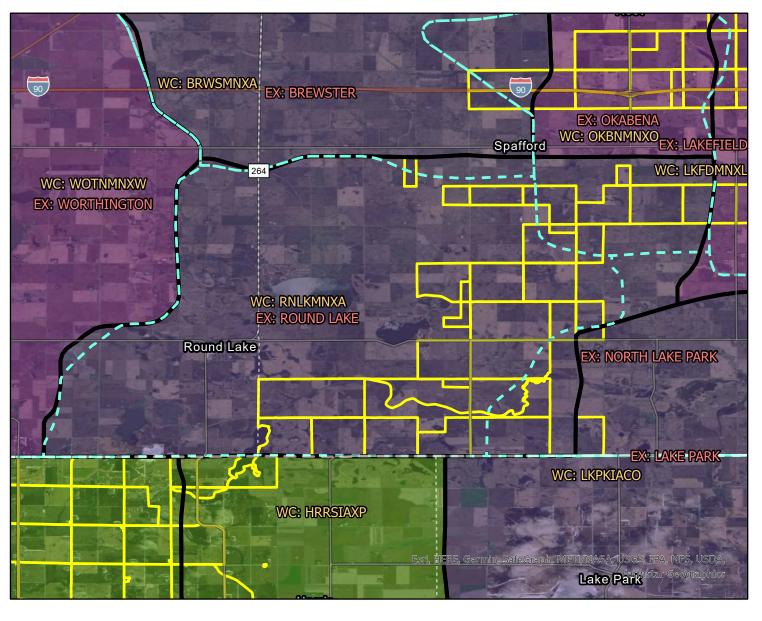






# WIRE CENTER: RNLKMNXA MINNESOTA

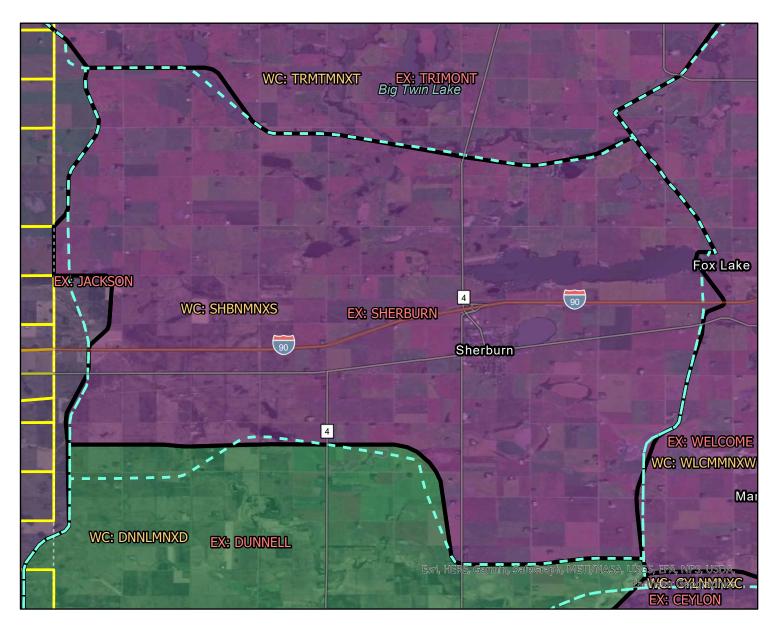






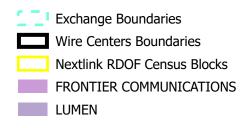
# WIRE CENTER: SHBNMNXS MINNESOTA

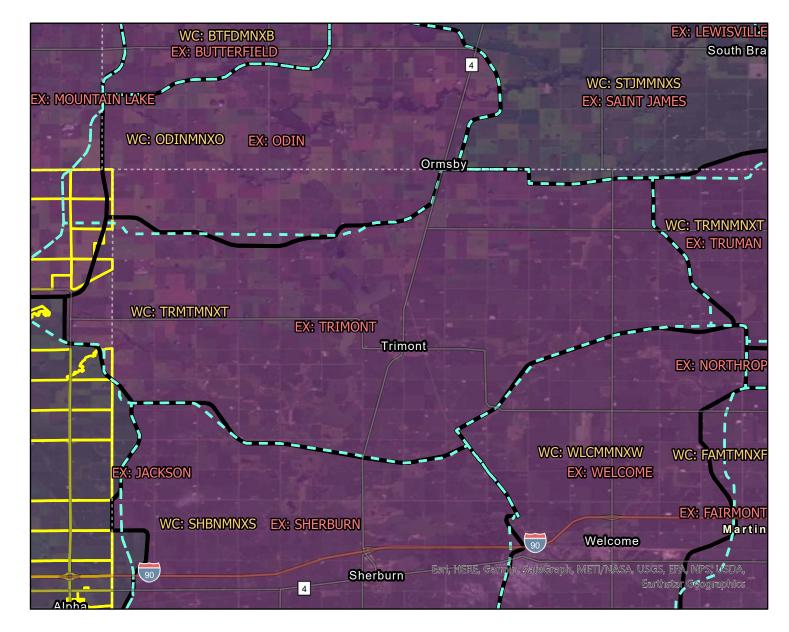






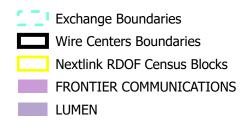
# WIRE CENTER: TRMTMNXT MINNESOTA

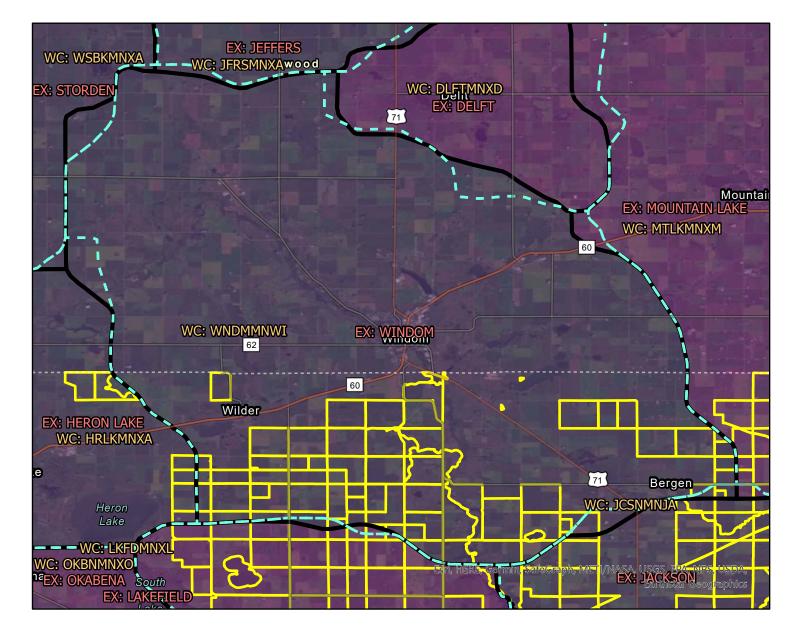






### WIRE CENTER: WNDMMNWI MINNESOTA







# WIRE CENTER: WOTNMNXW MINNESOTA





