



191290402022180	<input type="checkbox"/> In Error	<input type="checkbox"/> Correct	<input type="checkbox"/> No Response	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> No Response
191290402022181	<input type="checkbox"/> In Error	<input type="checkbox"/> Correct	<input type="checkbox"/> No Response	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> No Response
	<input type="checkbox"/> In Error	<input type="checkbox"/> Correct	<input type="checkbox"/> No Response	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> No Response
	<input type="checkbox"/> In Error	<input type="checkbox"/> Correct	<input type="checkbox"/> No Response	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> No Response

**D. ADDITIONAL EXPLANATION** (To the extent you believe additional explanation is required to ensure that you are communicating full and accurate information, please use the below space to further explain, qualify, or substantiate your above certification/attestation/affirmation. To the extent necessary, please feel free to attach additional pages and supporting documentation. If you are a Communications Service Provider and indicated "In Error" or "No Response" in the "Prior Reporting to FCC" column for any census blocks above, please elaborate.)

We are challenging the validity of the broadband availability data as it is presented in version 2 of the broadband availability map, for the four Mills County, Iowa, census blocks listed above. Spiral Communications submitted broadband deployment data to the FCC in their 477 Form dated 6/30/2018, which indicated they were offering broadband speeds of 30 Mbps down and 10 Mbps up using terrestrial fixed wireless technology in the four census blocks listed above. Their submitted data further stated they were offering broadband speeds of 977 Mbps down and 977 Mbps up using optical carrier / fiber to the premise technology in two of the four census blocks which are listed above; those blocks are 191290402012001 and 191290402012002. We are disputing broadband speeds submitted in their 477 report because we believe it is not accurate. We currently have plans in place to eventually overbuild the area covered by these blocks, and we currently have 16 customers who have pre-subscribed to take our service when it is available. Each resident we have spoken with in this area has told us the wireless service is slow and unreliable, and they are not getting the speeds they are paying for. In addition, we are certain Spiral Communications does not have the facilities in place to offer service over fiber in the two census blocks identified above, where they have this reported. None of this information which they reported on the 6/30/2018 477 form, was reported on their 12/31/2017 477 form, and we are certain there has been no significant activity in this area within the last 6 months, which would warrant this change in reporting, especially in regard to the availability of fiber-to-the-home in this area. The inaccurate reporting of this 477 data has caused the above referenced blocks to be identified as non-funded TSAs for the state broadband grant. As a result, these areas which are currently either unserved or underserved are ineligible for the state broadband grant funding which is available. This makes it more costly for us to build the network necessary to provide these customers with adequate service.

**E. SIGNATURE\***

Authorized Signature:



Date: 10/09/2019

Printed Name: Jeff Roiland

Title: CEO

**\*PLEASE READ BEFORE SIGNING:** By affixing my signature above, I, on my own behalf or as a representative of the company identified above, as applicable, expressly represent that I am authorized to make the above factual representation on behalf of said company and/or myself, as applicable, and under penalty of perjury as authorized by Iowa Code section 622.1 and pursuant to the laws of the state of Iowa, certify the following with respect to this form submitted on behalf of said company and/or myself: any statements, representations, warranties, certifications, or attestations made in this form, including any attachments or enclosures associated therewith, are true and accurate; I, on behalf of said company and/or myself, have not knowingly made any false statements or representations in this form. In addition to any criminal penalties authorized by Iowa Code section 720.2 that may result from any false statements of material fact made herein or any other remedies available at law, equity, or otherwise, if it is subsequently determined that I have made a statement, representation, warranty, certification, or attestation in this form, or any attachments or enclosures associated herewith, that is later proven untrue in any material respect, the company on which I submitted this form on behalf of may be disqualified from current incentive programs administered by the Office or may be ordered to repay the Office the entire amount of any funds previously distributed by the Office to said company in connection with any current incentive programs administered by the Office. OCIO makes no guarantees as to whether the information supplied by you will result in any change to the Broadband Availability Map or the way any incentive decisions are reviewed, scored, or decided. This form, as completed, any attachments hereto, and any other information or materials submitted to the Office in connection with this form or related inquiry, shall be considered public records and shall be made available for public examination and/or disseminated upon request by third parties as required by Iowa Code chapter 22. The Office reserves the right to reject this form and relatedly consider any information communicated through this form as neither credible nor probative if this form is not fully and properly filled out.