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|---|---|
| **Grant Request Number** | GRN-000835 |
| **Funding Program Name** | Middle Mile Broadband Infrastructure Grant Program |
| **Funding Request Name** | Visionary Communications, LLC - Middle Mile - GRN-000835 |
| **Applying Organization** | Visionary Communications, LLC |
| **Applicant Name** | Maisie Ramsay |

**Primary Applicant Type**

**Identify the primary applicant type:**

Single Entity
———
**Primary Entity Type**

**Type of entity: Primary entity type, (A) a State, political subdivision of a State, Tribal government, technology company, electric utility, utility cooperative, public utility district, telecommunications company, telecommunications cooperative, nonprofit foundation, nonprofit corporation, nonprofit institution, nonprofit association, regional planning council, Native entity, or economic development authority; or (B) a partnership of two (2) or more entities described in (A).**

**What is the primary applicant's entity type?**

Telecommunications Company
———
**Is parent/owner of applicant a foreign entity?**

No
———
**Managerial Capability**

**Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.**

Key Personnel - Brian Wagner; Visionary Communications, LLC; Chief Strategy Officer; bwagner@visionarybroadband.com
KeyPersonnel_Resume_Brian_Wagner
———

**Managerial Capability**

**Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.**

Key Personnel - Brian Worthen; Visionary Communications, LLC; CEO;
bworthen@visionarybroadband.com
KeyPersonnel_Resume_Brian_Worthen
———
**Managerial Capability**

**Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.**

Key Personnel - Greg Worthen; Visionary Communications, LLC; Business Development;
gworthen@visionarybroadband.com
KeyPersonnel_Resume_Greg_Worthen
———
**Managerial Capability**

**Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.**

Key Personnel - Jeremy Malli; Visionary Communications, LLC; Network Operations Center SME;
jmalli@visionarybroadband.com
KeyPersonnel_Resume_Jeremy_Malli
———
**Managerial Capability**

**Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.**

Key Personnel - Preston Schilling; Visionary Communications, LLC; Chief Operating Officer;
pschilling@visionarybroadband.com

KeyPersonnel_Resume_Preston_Schilling
———

**Managerial Capability**

**Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.**

Key Personnel - Sean Kennedy; Visionary Communications, LLC; Chief Technology Officer; skennedy@visionarybroadband.com
KeyPersonnel_Resume_Sean_Kennedy
———

**Organizational Charts**

**Each applicant shall submit any necessary organizational chart(s) detailing all of its parent companies, subsidiaries, and affiliates.**
**This upload section should also be used for any letters of support from the organizations that will be involved in the project as a community stakeholder.**

Organizational Chart-09-26-2022 09-39-Visionary Communications, LLC-GRN-000835.pdf
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**Organizational Details**

**Each applicant must also provide a narrative describing the applicant's readiness to manage a middle mile broadband network. This narrative should describe the experience and qualifications of key management set to undertake this project, the applicant's experience undertaking projects of similar size and scope, recent and upcoming organizational changes including mergers and acquisitions, relevant organizational policies, and ownership information consistent with 47 CFR § 1.2112.**

**This narrative shall denote who will own the assets at the end of award period. This response is limited to 6000 characters as an open field narrative.**

Visionary Communications, LLC opened its doors on December 6th, 1994, as a pioneering Internet Service Provider in Wyoming. Originally founded in a basement with six modems and a 56K Frame Relay connection to the Internet, we grew to become one of the largest and most geographically diverse providers in a three-state region.
We've evolved from a dialup ISP to a wireless+DSL company to a fiber+wireless company. As our wholesale services expanded, Visionary established relationships with almost 60 carriers across the Western United States. The experience we've gained through these relationships has been crucial to our success within Colorado, Wyoming and Montana. We also have an extensive knowledge base of

fiber contracting, leases and construction across multi-state jurisdictions.

Visionary is active in several innovative projects bringing broadband service to historically unserved and underserved communities throughout the Rockies, including public-private partnerships, state grant programs and federal grant programs.

Visionary's wholesale division, Mammoth Networks, has a proven track record of successfully managing middle-mile projects. Mammoth Networks designed, built and operated the Northwest Colorado Council of Governments' Project THOR network, a 400-mile middle-mile fiber ring connecting underserved communities across the region.

In addition to these initiatives, we've spent two decades building a successful aggregation model. Carriers, cable providers, regional fiber networks, government facilities, 911 and PSAP entities depend on our network for reliable middle-mile services.

For the NTIA Enabling Middle Mile Broadband Infrastructure program, Visionary proposes to design, build and operate the middle-mile network. While Visionary will retain ownership of the asset at the end of the award period, it will fully comply with NTIA interconnection and open-access requirements.

Visionary uses fiber, microwave, copper and coaxial technologies to deliver broadband across our service area. We are proud of our ability to marry our own fiber and microwave networks with third-party providers, creating a Layer 2 802.1Q network supporting jumbo packets. We use multiple platforms within our network, including Accedian, Adva, Arista, Brocade, Ciena, Cisco, Juniper, MRV and Telco Systems.

Visionary has invested in its employees and boasts a collective on-staff half-millennium of experience in designing, building, operating and supporting broadband networks. Our in-house experts design and engineer fiber networks, fixed wireless towers, and network layouts, drawing from a wealth of experience with fiber builds, tower construction, RF engineering, permitting and joint use. Where other companies contract out an entire project, we pride ourselves on being hands-on to assure quality and final product is the way it ought to be, with our own staff leading the charge.

On the Network Operations Center side, Visionary's team includes Cisco and Juniper certifications, and we have years of experience supporting networks for government entities, cellular carriers, regional telephone companies and other enterprise customers demanding the highest level of reliability and service.

As a Competitive Local Exchange Carrier, Visionary isn't the first broadband entrant into the community. Our competitive services introduce faster speeds, lower prices and more options to communities, benefiting residents, businesses and governments.

Ownership information per 47 C.F.R 1.2112(a)(1)-(7) is provided in supplemental attachment "Visionary Communications LLC Ownership Information" and as follows:

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

———

**Form CD-511 (Certification Regarding Lobbying)**

**The applicant must upload a completed form that certifies that Federal funds have not and will not be used for lobbying in connection with this request for Federal financial assistance. A fillable Form CD-511 can be found in the MMG ZIP folder.**

CD511 9-09-26-2022 06-00-Visionary Communications, LLC-GRN-000835.7.22.pdf, CD511 MR Signature 10-19-22-10-19-2022 04-16-Visionary Communications, LLC-GRN-000835.pdf
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**SAM.gov Registration**

**Applicants are asked to upload a screenshot of their SAM.gov registration.**

SAM-09-26-2022 09-27-Visionary Communications, LLC-GRN-000835.gov Registration Status.png, SAM gov registration 1-27-23-01-27-2023 02-04-Visionary Communications, LLC-GRN-000835.png
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**Executive Summary**

**Please describe how the applicant's proposal will advance the objectives of the MMG Program, as well as the specific objectives of outlined in the Notice of Funding Opportunity (NOFO);**

**An overview of the proposed route or service area(s), including information regarding rurality and socio-economic indicators in the area to be served by the proposed project.**
**This response is limited to 12000 characters as an open field narrative.**

Wyoming is the nation's 10th largest state by area and the smallest by population. This gives it the distinction of having the lowest population density among the lower 48 states. While Wyoming's unpopulated expanses of grassland and rugged mountains make for a picturesque Western landscape, they also present inherent challenges for broadband development.
With an average population density of about six people per square mile, broadband expansion can be a cost-prohibitive endeavor, especially when it comes to much-needed fiber deployment. State and federal grants have helped connect some of Wyoming's most far-flung communities, but much work remains to bridge the digital divide throughout the state.
Visionary Communications is seeking funding for two communities facing persistent problems with broadband affordability and availability: the Town of Wright and the Gillette-area neighborhood of Oriva Hills, both located in Campbell County, Wyoming. Insufficient middle-mile infrastructure has stymied broadband affordability and availability in both communities, and our proposed project leverages existing assets in order to cost effectively address these issues.
Visionary's $2.29 million proposal starts with a 11.5-mile fiber build to a key tower site feeding wireless service in Oriva Hills. A portion of the Oriva Hills fiber middle-mile leverages an agreement with the City of Gillette for use of existing raceway, a longstanding partnership that allows Visionary to lease municipal facilities for broadband deployment.
The fiber build will be augmented with the addition of two new tower sites and upgraded microwave backhauls. Combined, the middle-mile investments will address backhaul capacity constraints and coverage gaps.
Oriva Hills is a small, rural neighborhood of 128 homes located 10 miles west of Gillette, the county seat. Of those 128 homes, 100 are unserved or underserved. Given the neighborhood's low population

and distance from Gillette, the status quo is likely to continue unless cost offsets enable broadband investment.

DSL service to some Oriva Hills homes tops out at just 1.5Mbps – a connection that costs $33/meg and is inadequate for today's bandwidth-hungry applications. Visionary also provides a fixed wireless service to this neighborhood, but the lack of sufficient backhaul and the challenging terrain limit the ability to provide a robust 100Mbps+ service offering.

Visionary's cost-effective combination of new towers, high-capacity microwave links and fiber backhaul will facilitate 100/20Mbps fixed wireless service at nearly every unserved residence in Oriva Hills. On average, this will slash the cost of service by 98% to $0.69/meg and significantly improve availability. . (see attachments, "Service Costs" and "Service Availability Documentation – Oriva")

Costs are a particular concern for low-income families in Wright and Oriva Hills. Thirty-five percent of Wright residents live below the 200% poverty line, six percentage points higher than the national average, according to data from the 2020 American Community Survey. Veterans in Wright are especially vulnerable, with 30.6% of veterans aged 65+ living below the poverty level — five times the national average of 5.5%. Visionary participates in the FCC's Affordable Connectivity Program and will make its low-income plans available to veterans and other vulnerable populations.

In Oriva Hills, 41.4% of households receive social security income, higher than the national average of 31.4%. The area's aging population with disabilities also experiences higher poverty levels at nearly twice the national average. About 8 percent of Oriva Hills residents aged 65+ with disabilities live below the poverty line, compared to 4.7% nationwide. Visionary participates in the Affordable Connectivity Program, further enhancing the benefits to low-income residents of Wright and Oriva Hills.

While the Oriva Hills build leverages existing infrastructure and a partnership agreement, another longstanding partnership forms the foundation of the project's other main component: a Point of Presence (POP) in the Town of Wright.

For many years, Visionary has worked with the Town of Wright on broadband issues. The Wright POP would be the final link to connect the community to Visionary's existing middle-mile fiber infrastructure, which extends 40 miles north along Hwy 59 into the City of Gillette. (Though the middle-mile program does not fund last-mile infrastructure, the costs associated with establishing a POP at a Community Anchor Institution do qualify as eligible expenses, per question 3.11 in NTIA Frequently Asked Questions, Version 5.)

Wright is a rural community of 1,835 people located 40 miles south of Gillette. There is no middle-mile infrastructure within Wright town limits. As a result, it's impossible to buy a fiber circuit to feed a last-mile network. Wright does have access to fixed-wireless service but backhaul capacity restraint place limitations on last-mile speeds. Wireline offerings are available, but are woefully inadequate. The only wireline service in the community is DSL, with the vast majority of locations limited to advertised speeds of just 3-10Mbps. The cost of a 3Mbps DSL connection is $17/meg — an order of magnitude higher than what residents would pay for fiber services.

Visionary's project will bridge this gap. The POP would be the final link to connect the community to Visionary's existing middle-mile fiber infrastructure, which extends 40 miles north along Hwy 59 into the City of Gillette.

To facilitate redundancy for the Town of Wright, Visionary will provide an in-kind contribution of a 40.2 -mile IRU on a 20-year term from the Wright Visitor Center – a federally assisted project and town-owned facility – to the Campbell County administrative building in Gillette, the central resource for numerous services provided by the county to the Town of Wright.

The Town of Wright uses county resources for motor vehicle services, emergency services and law enforcement. By linking the Town Hall POP to the Visitor Center IRU, the Town of Wright will be linked to the county's administrative center through a diverse middle-mile connection, substantially benefitting local government and local residents.

The IRU will originate at an existing Visionary fiber facility at the Campbell County administrative building at 500 S Gillette Ave. in Gillette, Wyoming. The other end of the IRU will extend through existing Visionary middle-mile facilities and interface with the new middle-mile fiber contemplated by this application. Through the combination of the IRU of existing Visionary fiber assets and new fiber construction funded by this NTIA application, the fiber will ultimately terminate at the Wright Visitor Center, located at 15089 Hwy 387 in Wright.

To arrive at an estimated value for the in-kind contribution, Visionary reviewed real-life IRU valuations: an NTIA-approved BTOP IRU, three different calculations of an existing IRU of similar scale and term between Visionary and a regional electric utility, and an IRU calculated by utilizing a state department of transportation IRU valuation tool. These examples were specifically chosen due to their relevance to this project.

Using metrics from these real-life examples, Visionary developed a calculator that could compare valuations (see attachment, "IRU Valuations Workbook"). To arrive at the final valuation, Visionary applied the salient metrics – IRU term, mileage and strand count – to the valuation workbook, then used an average of the three lowest valuations to determine the fair value of the proposed IRU. This final valuation incorporates a holistic and below-market evaluation of the project IRU.

In addition to benefitting redundant communications for the Town of Wright, Visionary's proposal would enable competition in Wright by facilitating fiber-to-the-premises deployment. The introduction of competitive services will, in turn, reduce prices for residents, businesses and anchor institutions. Third-party carriers would be allowed to interconnect at any technically viable point along the funded middle-mile route, including the Wright POP, West IGO tower site or any other viable interconnection point along the proposed route. Visionary itself would also be able to leverage the proposed project to provide last-mile fiber service. This will dramatically improve the availability and affordability of wireline service by lowering per-megabit costs and expanding availability in the project area.

The project will be funded through a combination of NTIA Middle Mile Program revenues, in-kind contributions and cash on-hand. Visionary is prepared to comply with all program requirements, including Buy American provisions, Letter of Credit obligations and post-award reporting.

The NTIA Middle Mile program has the potential to bridge otherwise unbridgeable gaps in the nation's middle-mile infrastructure, gaps that preclude the introduction of critical broadband connectivity. Visionary's project fulfills this potential.

By leveraging existing infrastructure and in-kind contributions, Visionary's cost-effective middle-mile solution advances the objectives of the Middle Mile Program to lower the cost of connecting unserved and underserved areas. Visionary welcomes NTIA's consideration of its application.

———

**Level of Need**

**A description of the level of need in the proposed service area(s), including but not limited to communities considered unserved and/or underserved in the proposed service area(s), discussion of the competitive landscape in the area, variations among service areas if there are any, or the general economic conditions in the proposed funded service area.**

**This response is limited to 12000 characters as an open field narrative.**

Level of Need – Oriva Hills

Oriva Hills is a modest neighborhood located 10 miles west of Gillette, set among rolling hills with big-sky views of the surrounding countryside. Of the 128 homes in Oriva Hills, 100 are unserved or underserved, according to service availability checks and the most recent 477 data from June 30, 2021. This most recent 477 data indicates that the limited broadband access in Oriva Hills consists of satellite services, limited CenturyLink DSL services, and fixed wireless services from Visionary Communications and Collins Communications. FCC 477 data also indicates that 50Mbps DSL service from Range Telephone Cooperative is available in Oriva Hills, but this appears to be inaccurate. According to Range customer service, the company does not offer DSL in the Oriva Hills area. (see attachment, "Range Service Availability Check").

A check of more than two dozen addresses through CenturyLink's online service availability database found service availability ranging from 1.5Mbps to 40 Mbps. The majority of the DSL locations were at the lower speeds, with 3Mbps being the most common. Just two locations, 22 Oriva Rd and 30 Oriva Rd, advertised speeds of 40Mbps. Speeds at the two homes closest to those addresses, 42 Elk Mountain Dr and 28 Penrose Peak Rd, dropped to 10Mbps and 15Mbps, respectively. (see attachments, " Service Costs" and "Service Availability Documentation – Oriva")

Customers with a 1.5Mbps CenturyLink DSL connection are paying $33/megabit, an order of magnitude higher than the $0.69/megabit for the 100/20Mbps fixed wireless service Visionary will deploy in Oriva Hills if this project were to be funded. On a per-megabit basis, this cost reduction represents a savings of 98% from the existing 1.5Mbps DSL services for Oriva Hills customers.

Costs a re a concern for residents of Oriva Hills, where 41.4% of households receive social security income – higher than the national average of 31.4%. The area's aging population with disabilities also experiences higher poverty levels at nearly twice the national average. About 8 percent of Oriva Hills residents aged 65+ with disabilities live below the poverty line, compared to 4.7% nationwide. (see attachment, "Poverty Statistics")

Visionary proposes to bring critical fiber backhaul to the main tower site feeding Oriva Hills, substantially increasing the backhaul capacity available to the area. This increased backhaul capacity addresses the primary limitation of broadband availability in Oriva Hills and this expanded capacity will be available for all last-mile providers to utilize.

In addition to addressing the current backhaul capacity limitations, this project will also expand coverage in Oriva Hills with two additional towers. These new towers will allow Visionary and other last

-mile providers to not only serve additional locations in Oriva Hills, the tower additions will ultimately shorten the distance between the customers and the serving Access Points, allowing for greater speed offerings. The combination of the additional backhaul capacity and the new tower locations will allow Visionary to offer 100/20Mbps service plans, reducing per-megabit costs to a fraction of comparable DSL service in the area.

The area's rugged topography and low population density – there are only about 13 households per square mile – calls for a cost-effective technology solution. Visionary's proposed hybrid fixed wireless and fiber middle-mile utilizes both new and existing middle-mile infrastructure, representing the most cost-effective means to meet the area's needs.

Level of Need – Wright, Wyoming

Wright, Wyoming is a rural community of 1,835 people located 40 miles south of Gillette. Due to its remote location and low population density, Wright has struggled to attract investment in broadband infrastructure.

Critical anchor institutions in Wright, including local and county government, emergency services and the town's only healthcare clinic, lack access to fiber broadband essential to provide basic community services. Residents and businesses are similarly limited.

The community is currently served by satellite, fixed wireless service and DSL. Wireless service is available through Collins Communications and Visionary Communications. Collins' residential plans top out at 25Mbps down/3Mbps up for $70/month. T-Mobile's 477 data reports some 25/3 wireless coverage in the project area, but an availability check through T-Mobile's website found that no service is available.

Wright residents are paying up to $16.67/megabit for DSL service from CenturyLink, as advertised through CenturyLink's online service availability database. CenturyLink DSL speeds top out at 3Mbps in some areas – practically useless for all but the most rudimentary of online activities. (see attachments Service Costs, Service Availability Documentation – Wright)

Though Visionary provides fixed wireless coverage of 100/20Mbps – categorizing the community as served – the lack of sufficient backhaul capacity limits Visionary's ability to provide more robust services such as symmetrical broadband and/or Gig-level broadband access. Ultimately, the availability of competitive wireline connections is extremely limited to the detriment of the community.

Visionary proposes to create a Point of Presence at Wright Town Hall, a Community Anchor Institution used by both the town, Campbell County and numerous community groups. Though the middle-mile program does not fund last-mile infrastructure, the costs associated with establishing a POP at a Community Anchor Institution do qualify as eligible expenses, per NTIA Frequently Asked Questions Version 4.0, pg. 14, question 3.11. The POP would be the final link to connect the community to Visionary's existing middle-mile fiber infrastructure, which extends 40 miles north along Hwy 59 into the City of Gillette.

Visionary's proposal would enable competition in Wright by facilitating fiber-to-the-premises deployment. The introduction of competitive services will, in turn, reduce prices for residents, businesses and anchor institutions.

Third-party carriers would be allowed to interconnect at any technically viable point along the funded middle-mile route, including the Wright POP, West IGO tower site or any other viable interconnection

point along the proposed route. Visionary itself would also be able to leverage the proposed project to provide last-mile fiber service. This will dramatically improve the availability and affordability of wireline service by lowering per-megabit costs and expanding availability in the project area.

In addition to the Point of Presence, Visionary will also provide a 40.2-mile IRU to the Town of Wright that will facilitate redundancy for essential communication services. The 20-year IRU will extend from the Wright Visitor Center – a federally assisted project and town-owned facility – to the Campbell County administrative building in Gillette, the central resource for numerous services provided by the County to the Town of Wright.

The Town of Wright uses County resources for a variety of critical services including motor vehicle services (DMV), emergency services (911 dispatch), and law enforcement. By linking the Town Hall POP to the Visitor Center IRU, the Town of Wright will have a high-capacity, diverse middle-mile connection to the County's administrative center. This middle-mile augment will ensure connectivity for the Town's mission-critical functions and will provide a substantial benefit to the Town and local residents alike.

The IRU will originate at an existing Visionary fiber facility at the Campbell County administrative building at 500 S Gillette Ave. in Gillette, Wyoming. The other end of the IRU will extend through existing Visionary middle-mile facilities and interface with the new middle-mile fiber contemplated by this application. Through the combination of the IRU of existing Visionary fiber assets and new fiber construction funded by this NTIA application, the fiber will ultimately terminate at the Wright Visitor Center, located at 15089 Hwy 387 in Wright.

If funded, Visionary will be positioned to offer rate plans that will slash the cost of wireline service from $16.67/megabit to $0.07/megabit for residential customers and $0.09/megabit for business accounts. (see attachment, "Pricing") Not only will broadband service be faster and more reliable due to the additional middle-mile route , it will be more affordable – and therefore more accessible – to the community.

The project will yield direct benefits to a population whose measures of poverty fare worse than the national average. Thirty-five percent of Wright residents live below the 200% poverty line, six percentage points higher than the national average, according to data from the 2020 American Community Survey. (see attachment, "Poverty Statistics"). Nearly 21% of non-veteran residents aged 18-64 live below the poverty line, a full eight percentage points higher than the national average. Similarly, the census found 19% of the residents of Wright have a reported income below the poverty line, far higher than the national average of 11.8%.

Veterans in Wright are especially vulnerable, with 30.6% of veterans aged 65+ living below the poverty level – five times the national average of 5.5%. Visionary participates in the FCC's Affordable Connectivity Program and will make its low-income plans available to veterans and other vulnerable populations.

By leveraging its existing middle-mile infrastructure for a Wright POP, Visionary has identified a cost-effective means to improve the affordability and availability of last-mile broadband service in the community.

———

**State Collaboration Acknowledgement**

**NTIA strongly encourages prospective non-state applicants to coordinate and consult with the State Broadband Office or other coordinating body located in the jurisdiction in which the eligible entity proposes to deploy middle mile infrastructure to ensure that the proposal is consistent with the state's broadband plan and priorities. Please confirm collaboration and consultation.**

**Do you confirm collaboration and consultation with the appropriate organization?**

Yes

———

**State and Local Collaboration Narrative**

**Please provide information on the applicant's coordination with applicable State, Territory, Tribal, and local governments, including their awareness of the proposed project and any potential impact to respective service areas; and**

**Information regarding the applicant's involvement and coordination with community organizations or other relevant partners in the proposed service area.**

**This response is limited to 6000 characters as an open field narrative.**

Visionary's proposed project is in the heart of its territory – Visionary's corporate headquarters are located in Gillette, just a short drive to the communities of Wright and Oriva Hills. Thanks to its close physical presence,
Visionary not only has a physical presence in the communities served by this project, it also has longstanding relationships with community groups and local governments, including the Town of Wright, the City of Gillette and Campbell County. Visionary is also a major provider of internet services to Campbell County government, residents and the Town of Wright.
Visionary has worked with the Town of Wright on broadband issues for several years, first through the expansion of fixed wireless services and now through the proposed middle-mile project. The proposed build would create a POP at Wright Town Hall, facilitate expansion of fiber-to-the-premises and enable reductions in middle-mile pricing. (see attachment, Letter of Support Town of Wright). The Town of Wright will allow the POP to be hosted at Town Hall but otherwise carries no responsibilities for project outcomes.
Visionary's close relationship with Campbell County is also evident in the proposed project. Visionary currently provides services to the Campbell County Sheriff's Office, library system, airport and courthouse. Visionary also has longstanding agreements with the Campbell County Fire Protection District to provide broadband service at each fire station. The middle mile improvements enabled by Visionary's project will directly benefit Campbell County government and the residents of Campbell County. (see attachment, Letter of Support Campbell County)

Oriva Hills is not governed by a Home Owners Association. It does, however, have two community groups organized on Facebook, Oriva Hills Landowners and Oriva Hills Community. Visionary has already engaged with both groups and will keep them apprised of project-related developments.
As a regional ISP, Visionary understands the importance of community involvement. Visionary has an established track record of working closely with the communities it serves and will continue to do so for Wright and Oriva Hills.

———

**Will the project connect middle mile infrastructure to last mile networks that provide or plan to provide broadband service to households in unserved areas?**

Yes

———

**Is the project connecting non-contiguous trust lands?**

No

———

**Do you commit to offering wholesale broadband service at reasonable rates on a carrier-neutral basis?**

Yes

———

**The eligible entity adopts fiscally sustainable middle mile strategies. This strategy should be described in the Budget Narrative.**

**Do you attest to this?**

Yes

———

**The eligible entity commits to offering non-discriminatory interconnect to terrestrial and wireless last mile broadband providers and any other party making a bona fide request. This policy will be described in the Interconnect Policy.**

**Do you attest to this?**

Yes

———

**The eligible entity identifies specific terrestrial and wireless last mile broadband providers that have(i) expressed written interest in interconnecting with middle mile infrastructure planned to be deployed by the eligible entity; and ii) demonstrated sustainable business plans or adequate funding sources with respect to such interconnection. This may be demonstrated in the Level of Need narrative of the Exec Summary.**

**Do you attest to this?**

Yes

———

**The eligible entity has identified supplemental investments or in-kind support (such as waived franchise or permitting fees) that will accelerate the completion of the planned project. Such acceleration may be described in the Project Timeline narrative.**

**Do you attest to this?**

No

———

**The eligible entity has demonstrated that the middle mile infrastructure will benefit national security interests of the United States and the Department of Defense. The benefits may be explained in the Benefitting National Security Interests Narrative.**

**Do you attest to this?**

Yes

———

**Please describe:**

Visionary's proposed project will benefit national security interests by introducing new middle-mile routes for emergency communications. In Wright, the project will facilitate diverse connectivity for Campbell County Fire Station #9 in Wright and the satellite office for the Campbell County Sheriff, which provides law enforcement for the town. The Town of Wright will also be able to bolster the resiliency of their communications systems through the Town Hall POP, which will provide a new middle-mile link to Gillette.

In Gillette, the proposed fiber route passes within 1,000' of Campbell County Fire Station #4 and will enable the facility to interconnect. Oriva Hills residents will benefit from the increased capacity and availability of broadband services that will be facilitated by

Oriva Hills will sustain safety improvements through the increased capacity and availability of broadband services facilitated by the project, which will enable emergency communications even for residents with limited cellular connectivity.

In addition to these benefits, Visionary is prepared to utilize the program-funded assts for any valid national security request.

———

**Project Duration**

**Number of Years**

**Project Timeline Narrative**

**The narrative requires the Applicant to describe a project with critical path, including key milestones for implementation of the project, preparations, and risk factors; and a capital investment schedule evidencing that the applicant will complete build-out and the initiation of service within five years of the date on which the entity receives the grant and will meet interim buildout requirements set forth herein and in any other binding document.**
**If the project is able to be accelerated with supplemental investments or in-kind support to meet a statutory purpose, this should be explained.**

**This response is limited to 6000 characters as an open field narrative.**

Visionary Communications has projected a 24-month completion for its proposed project. This schedule is based on both the scope of the proposed build and Visionary's extensive experience with similar projects. As visualized in the project timeline and capital investment schedule (see attachment, Project Timeline), Visionary plans to start the Wright and Gillette-area fiber builds concurrently as soon as funding is awarded. All project components meet Categorical Exclusion criteria and a full Environmental Assessment is not anticipated.
Visionary will commence the Wright fiber build with an engineering review to update the original design and bill of materials. This phase, estimated to take 32 business days, will also generate placing prints for use in later permitting and construction phases. As permitting for the Wright portion of the project is expected to be relatively modest, 55 working days have been allocated to procure permissions from WYDOT and the Town of Wright. Construction will take 33 working days and is expected to conclude by mid-November of 2023. After testing and activation, the Wright POP is schedule to go live in December 2023.
In terms of the capital investment schedule for the Wright POP, Visionary anticipates capex of $141,816 for materials, engineering and construction over the first 12 months of the project, at which point the Wright POP will be complete and no additional capital expenditures will be incurred.
The Southern Drive to West IGO fiber build is projected as a 24-month project, with the capital investment schedule forecasting year-one expenditures of $146,051 on fiber materials and permitting followed by year-two expenditures of $818,417 for fiber construction.
The Southern Drive to West IGO fiber build will commence with a thorough review of private easements and permitting requirements. Visionary's preliminary analysis indicates existing Rights of Way can be used for the vast majority of parcels along the build.
Of the 269 parcels intersected by or adjacent to the Southern Drive to West IGO fiber build, only 18 were flagged as potentially needing private easements during Visionary's preliminary review. Existing Rights of Way can be used for the remaining 93% of parcels. Visionary's dedicated site acquisition staff have a successful track record in working with landowners to procure private easements. Their research will flow through to the engineering phase, where the final route will be updated based on

their findings. Final engineering is estimated to take 32 business days and will produce an updated design, bill of materials and placing prints.
Given the length of the build, permitting requirements and the need for private easements, Visionary has allocated nearly a full calendar year – 229 working days – to obtain all necessary permissions before the project can move to construction. Construction is projected at five months, or 110 working days, followed by another month for testing and activation. This allows for completion of the Southern Drive to West IGO fiber middle-mile by December 2024.
Backhaul upgrades in Oriva Hills are dependent upon the Southern Drive to West IGO fiber build, which will bring fiber connectivity to the West IGO tower site. As such, construction of the physical plant - microwave backhaul upgrades and the [redacted] and [redacted] towers – will not commence until after Southern Drive to West IGO portion is complete. However, site acquisition, engineering, permitting and procurement will take place concurrently with the Southern Drive fiber build to maximize efficiency and reduce total build time. Construction is planned to take place entirely in the second year of the project and is forecast to begin in the first quarter of 2025 for completion in May 2025.
The year-two construction timeline is reflected in the capital investment schedule for the Oriva Hills backhaul upgrades. Costs totaling $213,901 for easements, equipment, tower structures, FCC licenses and labor will all be incurred over the second half of the 24-month timeframe.
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**Project Timeline File**

**Applicants are asked to upload a timeline which will denote key milestones for implementation of the project, including but not limited to field survey, network design, equipment/material procurement, environmental assessment, permitting, construction, network testing, network activation and completion.**

SA UPDATED Project Timeline MR 10-20-22-10-20-2022 12-56-Visionary Communications, LLC-GRN-000835.xlsx
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**Is an extension being requested?**

No
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**Special Rules for Tribal Governments and Native Entities**

**The Infrastructure Investment and Jobs Act permits the Assistant Secretary, in consultation with Tribal governments and Native entities, to waive, or specify alternative requirements, in connection with most directives governing the MMG Program if the Assistant Secretary finds that waiver or modification of the requirement is necessary for (a) the effective delivery and administration of middle mile grants to Tribal governments or (b) the construction, improvement, or acquisition of middle mile infrastructure on trust land.**

**Is a waiver or alternative requirements requested?**

No

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**Fair Labor Practices**

**Applicants must have a demonstrated record of and plans to be in compliance with federal labor and employment laws as described in III.H in the NOFO. This will help ensure that projects are carried out in accordance with the law, assist NTIA in ensuring that a prospective awardee is capable of carrying out activities funded by an award in a competent manner in compliance with all applicable federal, state, and local laws; and promote the effective and efficient completion of high-quality middle mile broadband infrastructure projects by ensuring a reliable supply of skilled workers and minimizing disruptive and costly delays.**

**This response is limited to 6000 characters as an open field narrative.**

As one of the fastest growing ISPs (Internet Service Providers) in the Rocky Mountain region, Visionary takes immense pride in providing a workplace that is not only supportive of its employees, but a work environment that promotes the highest level of safety and compliance with all federal, state, and local labor and employment laws.

Visionary currently employees more than 200 employees. Visionary has developed and deployed numerous best practices in advancing its binding commitment to strong labor standards and protections for its workforce. Four methodologies are key to Visionary's fair labor practices: promoting internal employee communication, posting Federal Labor Standards Act (FLSA) information requirements, establishing prevailing wage data, and screening of contractors and subcontractors.

Visionary first and foremost promotes a culture of internal communication, ensuring that all employees feel empowered to bring current or potential matters to leadership's attention. Allowing employees to be a part of the solution has provided Visionary with the ability to deploy proactive solutions, leading to a safer and more productive workplace. Identifying areas of concern and resolving them on a proactive basis is a cornerstone of Visionary's company culture.

Secondly, information required by FLSA is posted and available to all employees. This includes requirements on minimum wage, overtime, hours worked and record keeping. Supporting documentation can be obtained from the employee handbook, which is provided to all employees upon hire and reviewed on an annual basis. (see attachment, "Visionary Employee Handbook") All data can be accessed in-person or found online via a shared folder, allowing continual access for all employees.

As part of Visionary's ongoing support for its employees, internal wage rates meet or exceed that of any prevailing wage rate set by the State of Wyoming for workers engaged in work of a similar character. To determine the wage set for Visionary employees, the company utilizes employment data provided by the Wyoming Department of Workforce Services to determine rate information for comparable construction positions. State employment data is provided to all Wyoming businesses on

an annual basis and Visionary adjusts its wage base accordingly. (see attachment, “2022 Prevailing Wage Rates”)

Lastly, Visionary has a proven track record for vetting contractors and subcontractors across its rapidly expanding network. In the process of vetting a potential contractor for a given project, Visionary utilizes a multi-step process to ensure all third-party contractors comply with local, state, and federal requirements.

The process starts with a thorough scope review between Visionary’s construction management team and the contractor to ensure all aspects of the job are understood completely. This review encompasses all aspects of outside plant construction, including placement type, make-ready and permitting. This process ensures a full understanding of all legal, reporting, safety, and placing requirements prior to construction.

Visionary requires all contractors to possess an up-to-date certificate of insurance, a signed Master Services Agreement, and appropriate certificates of licensure, as well as supplemental insurance that may be required for lawful operation of business.

Contractors are screened for OSHA safety violations and evaluations are conducted of machinery and crew size, in addition to interviews with individual crew members. This determines the degree of credentialed workforce, relevant pre-existing occupational training, certification, and required licensures.

Visionary also conducts independent reference checks with third-party stakeholders who have previously employed the contractor to discuss response times, safety, and quality of work. Contractors are authorized to perform work only after passing the review process, executing an MSA (Master Services Agreement) and providing all necessary insurance certifications. (see attachment, “Master Construction Service Agreement”)

It is Visionary’s full disclosure that it does not have any current or ongoing occurrences in which itself, its contractors, or its subcontractors have been found to have violated the Occupational Safety and Health Act, the Fair Labor Standards Act, or any other applicable labor and employment laws for the preceding three years.

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**Officer Certification**

**In order for NTIA to evaluate an applicant’s demonstrated record of and plans to be in compliance with federal labor and employment laws, each applicant must provide examples of items described in III.H in the NOFO. Applicants are asked to upload a Certification from an Officer/Director-level employee (or equivalent) of the applicant evidencing consistent past compliance with federal labor and employment laws by the applicant, as well as contractors and subcontractors.**

FINAL Workforce Compliance Cert-09-30-2022 12-23-Visionary Communications, LLC-GRN-000835.pdf, Labor-Standards-2022-Prevailing-Wage-Rates-09-30-2022 12-24-Visionary Communications, LLC-GRN-000835.pdf, LadderToClimb-09-30-2022 12-24-Visionary Communications, LLC-GRN-000835.pdf, Master Construction Service Agreement-09-30-2022 12-24-Visionary Communications, LLC-GRN-000835.docx

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**Highly Skilled Workforce**

**To ensure that applicants have the technical and operational capacity to carry out the project, applicants must submit a plan for ensuring that the project workforce will be an appropriately skilled and credentialed workforce (including by the applicant and each of its contractors and subcontractors). The plan for a highly skilled workforce should include the information described in III.I in the NOFO.**

**This response is limited to 6**
**000 characters as an open field narrative.**

Visionary places high priority on its ability to properly screen, employ, train, and retain a highly skilled workforce. As a fast-growing ISP (Internet Service Provider) with more than 200 employees, Visionary takes great responsibility in providing a workplace that promotes employee growth from within. Visionary ensures that its employees are provided the opportunity for pay advancement, career growth and continued education. To retain the operational and technical abilities to expand its extensive network, Visionary strives to provide its employees opportunities for internal promotion and continued education while also adhering to a strict vetting process for third-party contractors.
Visionary believes in its employees potential and provides avenues to promote from within. By providing professional development opportunities and promoting from within, Visionary has attracted and retained a highly skilled workforce. One example of this is Visionary's internal promotion program, Steps to Climb the Ladder Faster.
Steps to Climb the Ladder Faster was developed for field service installation crew members. Crew members starting their careers with little to no experience can now determine the level of training, number of installations, re-aims, removals, and repairs that are required to "climb the ladder" into the next tier of field service installation. As each employee completes the level of experience within each tier, they are given the opportunity to move up. This comes with improved pay and the opportunity to ascend from within.
Visionary intends to adopt this methodology across all positions of construction and those involved in the deployment of broadband services. Please refer to the supporting documentation (see attachment, "LadderToClimb") for further detail on Steps to Climb the Ladder Faster.
Continued education is another key component of Visionary's workforce development and allows Visionary employees to utilize state-of-the-art technology to expand our network. For instance, the team working on outside plant construction – including the proposed project – may access a variety of industry-specific training such as boring, trenching, splicing, permitting and network design.
Workplace safety is also a focus of Visionary's training efforts. This includes the development of safety protocols and regular construction team meetings for ongoing safety improvement measures. By keeping employees safe, Visionary reduces turnover and improves workforce retention.
With Visionary's current growth and expansion, utilizing contract labor throughout our expanding network has become essential. Visionary has developed a rigorous vetting process for selecting skilled

third-party contractors. This process includes an OSHA safety violations search, an in-depth review of machinery, crew size, work conditions, safety programs, and any other information pertinent to local, state, and federal laws.
To ensure the proper skill sets are in place for all contracted work, Visionary vets contractors for industry best practices and verifies they can provide the needed level of licensure, certification and supporting documentation for the required project.
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**Advancing Workforce Development**

**A skilled workforce is critical to meeting infrastructure buildout timelines under the Infrastructure Act and connecting households across the country to reliable, affordable, high-speed broadband. A well-trained workforce will also allow for the safe deployment of sustainable networks. To meet the workforce needs of the MMG Program, applicants must make appropriate investments to develop a skilled, diverse workforce. Each applicant must provide as part of its application examples of items described in III.J in the NOFO.**

**This response is limited to 6000 characters as an open field narrative.**

Visionary understands that a skilled workforce is critical to the success of delivering and connecting households across the country to reliable, affordable, high-speed broadband. As part of Visionary's commitment to meet these objectives, it is also vital to provide support for the development of that highly skilled workforce. Visionary provides support and direction by means of internal promotion programs, outreach and talent recruitment via partnerships and community involvement, and a commitment to provide opportunities for a diverse pool of workers, including those populations that have traditionally been underrepresented in broadband and information technology.
Visionary provides its employees with the skills, education, and training required to advance within the company. This is a key component to ensuring the business can employ and develop its growing workforce. One example of Visionary's workforce development initiatives is an internal promotion program, Steps to Climb the Ladder Faster.
Steps to Climb the Ladder Faster was developed for field service installation crew members. Crew members starting their careers with little to no experience can now determine the level of training, number of installations, re-aims, removals, and repairs that are required to "climb the ladder" into the next tier of field service installation. As each employee completes the level of experience within each tier, they are given the opportunity to move up. This comes with improved pay and the opportunity to ascend from within.
Visionary intends to adopt this methodology across all positions of construction and those involved in

the deployment of broadband services. Please refer to the supporting documentation (see attachment, “LadderToClimb”) for further detail on Steps to Climb the Ladder Faster.

Outreach and recruitment of a highly skilled workforce is invaluable to the growth and development of Visionary’s expanding network. Recruitment starts primarily in Visionary’s home territory of Gillette, Wyoming. The local community is home to Gillette Community College, which offers academic courses in information technology, cyber security, and certificates in construction technology. Visionary continues to be heavily involved at a local level through participation in classroom speaking opportunities and institution-sponsored job fairs.

This strategic outreach allows Visionary to seek out diverse demographics including women, persons of color, and students for whom English may not be a first language. Beyond Gillette, Visionary is also an active participant in other educational institutions across Wyoming including Sheridan College, Laramie County Community College, and the University of Wyoming.

To complement Visionary’s pursuit of college-level talent, Visionary is also a staunch supporter of the Wyoming Department of Workforce Service and the programs it supports. Visionary prioritizes statewide job fairs sponsored by Wyoming Department of Workforce Services. These job fairs provide specific focus on Wyoming veterans, low-income individuals, and disabled and recovering individuals participating in vocational rehabilitation programs. One such program that Visionary has supported is Climb Wyoming. This program supports low-income single mothers who are looking to discover self-sufficiency through career training and placement. Ultimately, Visionary will continue to seek out and obtain talent from qualified individuals across all backgrounds.

Visionary will abide by the requirements set out in 2 C.F.R. § 200.321, which requires non-federal recipients of federal grants to “take all necessary affirmative steps to assure that minority businesses, women’s business enterprises, and labor surplus area firms are used when possible.” Visionary will make every effort to solicit those services of small minority businesses and women’s business enterprises. With small-business roots, Visionary promotes and supports opportunities to conduct business with diverse demographics across its service footprint.

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**Climate Resiliency**

**Please demonstrate that the applicant has sufficiently accounted for current and future weather- and climate-related risks to new MMG Program infrastructure projects. In particular, each applicant should clearly demonstrate how it is conducting the items listed in III.K in the NOFO.**

**This response is limited to 6000 characters as an open field narrative.**

The project area is located in Wright, Wyoming and the rural neighborhood of Oriva Hills adjacent to Gillette, Wyoming. Both communities are within Campbell County, a 4,807 square-mile area of semiarid grassland that abuts Wyoming's northeast border with Montana.

Winter and spring precipitation is projected to increase due to climate change, according to NOAA's state climate summary for Wyoming. Heavier spring precipitation, combined with a shift from snow to rain, could increase the potential for flooding. In addition, rising temperatures may contribute to the intensity of droughts, escalating the frequency and severity of wildfires.

According to NOAA storm data, annual extreme weather events in Campbell County have increased steadily over the past 40 years. A record 120 extreme weather events were recorded in 2021, primarily high winds and hail. (See attachment NOAA Storm Data Campbell County 1982 - 2022).

In Gillette and Wright, the most frequent extreme weather events are hail, high winds and tornados. Flash floods, though comparatively infrequent, are the third-largest contributor to property damage. FEMA reports the Wright and Oriva Hills project areas are at high risk for wildfire, hail, tornados and extreme cold temperatures. (see attachment FEMA National Risk Index Report)

Utilizing NOAA climate modeling, FEMA National Risk Index, and local and state mitigation plans, the project area will be thoroughly screened for risks posed by wildfire, hail, wind, flooding hazards and extreme temperatures. Design considerations will include the outside plant, electronics and networking; primary and backup power, facility siting, redundant connectivity and asset hardening.

Visionary's proposed fiber route is engineered as an all-underground build, a design that is inherently resilient to extreme weather events such as wildfire, wind and hail. Fiber paths will be also routed to avoid flooding hazards. Tower facilities will be hardened against extreme wind and hail, with adequate defensible space to protect towers against wildfire. Facilities will use IP55 standards for protection against water and particulate matter. Redundant connectivity will be provided wherever possible, as will sources of backup electricity in the event of a power outage.

Following the initial hazard screening, evaluations will be conducted periodically to ensure adequate protection over the 20-year life of the assets. Mitigation strategies will be updated based on the latest climate models from NOAA, FEMA and local agencies.

Visionary has long-established policies and procedures for network monitoring and outage triage that are already being used to maximize uptime and minimize time-to-restore across its network.

Visionary's monitoring system generates automatic alerts for disruptions in connectivity and power, and these same automated alert systems and internal processes would be utilized for project assets.

In the event of physical damage to project infrastructure, restoration crews will be immediately dispatched for repairs. The project areas' proximity to Visionary's Gillette headquarters will further expedite repairs.

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**Civil Rights and Nondiscrimination Law Compliance**

**Prior to distributing any MMG Program funding to a prospective awardee, NTIA will require the prospective awardee to agree, by contract or other binding commitment, to abide by the non-discrimination requirements set forth in III.J in the NOFO.**

**Do you agree to abide by the non-discrimination requirements?**

Yes

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**Certification of Technical Capability**

**Each applicant must supply a certification attesting that it is technically qualified to complete and operate the proposed project.**

FINAL Certificate of Technical Capability-09-30-2022 12-32-Visionary Communications, LLC-GRN-000835.pdf

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**Interconnect Policy**

**The Applicant must describe in detail the nondiscrimination, interconnection, and network management practices that would be adopted for the project facilities. The Applicant should describe how it will comply with nondiscrimination and interconnection obligations, particularly with connectivity to the public Internet and physical interconnection for the exchange of traffic. In addition to describing network management practices, the Applicant should disclose any practices in place to block access to illegal or harmful content.**

**This response is limited to 6000 characters as an open field narrative.**

INTERCONNECTION POLICY
Visionary shall provide access to NTIA-funded facilities at any technically feasible point along the network in perpetuity, without exceeding current or reasonably anticipated capacity limitations.
This duty includes, at a minimum, the physical interconnection of the recipient's facilities to a requesting party's facilities for the exchange of traffic. In addition, recipients shall connect to the public Internet directly or indirectly and provide requesting parties with an ability to connect to the Internet.
Rates and terms for interconnection shall be reasonable and nondiscriminatory. Visionary shall negotiate in good faith with all requesting parties (i.e., public, private, non-profit, or other parties) making a bona fide request for interconnection or wholesale services.
OPEN INTERNET POLICY
January 1st, 2022
Visionary Communications, Inc. ("Visionary", "we," "our," or "us") is committed to an open Internet and supports the following Net Neutrality principles:
No Blocking of Internet content, subject to reasonable network management as described below.
No Throttling of Internet content, subject to reasonable network management as described below.
No Unreasonable Discrimination.
No Paid Prioritization of Internet content.
Freedom of Customers to access lawful content.

Freedom of Customers to use non-harmful applications of their choice.
Freedom of Customers to attach non-harmful personal device.

This Open Internet Policy sets forth certain information regarding the policies and practices of Visionary and how we manage our network for broadband internet access service (the "Visionary Network"). This Open Internet Policy is a supplement to and is incorporated by reference in our Standard Terms and Conditions agreement available at: https://www.vcn.com/terms/.

NETWORK MANAGEMENT PRACTICES

A. Blocking: Other than reasonable network management practices disclosed below, we do not block or otherwise prevent a Customer from lawful content.

B. Throttling: Other than reasonable network management practices disclosed below, we do not throttle or otherwise degrade or impair Customer access to lawful Internet traffic on the basis of content, application, service, user, or use of a non-harmful device.

C. Affiliated Prioritization: We do not directly or indirectly favor some traffic over other traffic, including through use of techniques such as traffic shaping, prioritization, or resource reservation, to benefit any of our affiliates, defined as an entity that controls, is controlled by, or is under common control with Visionary.

D. Paid Prioritization: We do not directly or indirectly favor some traffic over other traffic, including through use of techniques such as traffic shaping, prioritization, or resource reservation, in exchange for consideration, monetary or otherwise.

FCC REQUIREMENTS AND COMPLAINT PROCESS

The Federal Communications Commission ("FCC") has adopted rules to preserve the Internet as an open platform ("Rules"). Information regarding these Rules is available on the FCC's website at: https://docs.fcc.gov/public/attachments/DOC-328399A1.pdf

If a Customer believes that we are not in compliance with the FCC's rules, the Customer may file an informal complaint with the FCC. The FCC urges Customers to submit any complaints via its website at the following address: https://consumercomplaints.fcc.gov/hc/en-us.

ADDITIONAL DISCLAIMERS

This Open Internet Policy does not affect, alter, or otherwise supersede the legal status of cooperative efforts by Visionary that are designed to curtail copyright or trademark infringement in response to information provided by rights holders in a manner that is timely, effective, and accommodates the legitimate interests of the company, rights holders, our Customers, and other end users. Furthermore, this Open Internet Policy does not prohibit us from making reasonable efforts to address the transfer of unlawful content or unlawful transfers of content. For additional information, please review the Terms and Conditions and Privacy Policies (both can be found at vcn.com).

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**Technical Overview**

**Please describe targeted last mile service objectives, including last mile service provider letters of commitment, agreements, or contracts; and a description of the proposed service offerings, including the pricing of the services to be offered over the proposed facility.**

**This response is limited to 6000 characters as an open field narrative.**

Visionary's proposed middle-mile project has two primary objectives. The proposal will support last-mile broadband service in Oriva Hills, a neighborhood about 10 miles west of Gillette, Wyoming where the majority of residents are underserved and other residents are unserved altogether. The proposal will also facilitate more affordable broadband service in the town of Wright, Wyoming.

The primary service provider in Oriva Hills is Lumen, operating under its legacy CenturyLink brand. CenturyLink's DSL offerings in Oriva Hills are slow, with marketed speeds as low as 1.5Mbps, and expensive, with its 1.5Mbps DSL plan is priced at $33.33/megabit. (see attachments Service Costs, Service Availability Documentation – Oriva)

Visionary's proposal will improve both the affordability and availability of broadband service in Oriva Hills.

Visionary currently provides a fixed wireless service to Oriva Hills, but speeds and coverage are hampered by challenging terrain and the lack of sufficient backhaul. Additional investment made possible through the Middle Mile Program would allow Visionary to address terrain challenges with new tower sites and improve capacity with backhaul upgrades, ultimately enabling expansion of 100Mbps service in Oriva Hills.

Visionary would improve service in Oriva Hills through three key middle-mile enhancements. First, Visionary will address the terrain challenges by adding two additional towers to augment our existing sites in the area. These new sites, the [redacted] Tower and [redacted] Tower, would greatly enhance fixed wireless coverage in Oriva Hills.

Second, the project will augment backhaul capacity available to the Visionary towers in Oriva Hills. Currently, Visionary's Oriva Hill tower are fed by multiple microwave links that aggregate at a central tower, the West IGO site. Visionary proposes to bring fiber to this central aggregation point, substantially increasing the available bandwidth feeding the Oriva Hills neighborhood.

From the fiber-fed West IGO site, the increased capacity will be disbursed to towers serving Oriva Hills through upgraded backhaul connections to existing sites and the two proposed new tower builds. (see attachment, Network Diagram) Once complete, Visionary will have sufficient backhaul capacity to start providing 100/20Mbps service to Oriva Hills.

Third, the addition of the [redacted] and [redacted] sites allows a ring configuration that facilitates backhaul diversity and redundancy. (see attachment, Network Diagram) The combination of these elements will bring faster, less expensive and more reliable Internet service to this unserved and underserved community.

Like Oriva Hills, the Town of Wright has its own broadband challenges, though of a different nature. The Town of Wright is currently served by satellite, fixed wireless service and DSL. However, the availability of competitive wireline service is extremely limited.

Wright residents are paying up to $16.67/megabit for DSL service from CenturyLink, as advertised through CenturyLink's online service availability database. CenturyLink DSL speeds top out at 3Mbps in some areas – unusable for all but the most rudimentary of online activities. (see attachments Service Costs, Service Availability Documentation – Wright)

The high costs and limited availability of wireline service negatively affects residents, businesses and community anchor institutions. Visionary's proposed project will leverage Visionary's existing middle-mile outside the Town of Wright to establish a Point of Presence at Town Hall, a community anchor institution central to the community's day-to-day functions. (Costs associated with establishing a Point of Presence at a Community Anchor Institutions qualify as eligible expenses, per NTIA Frequently Asked Questions and Answers, Version 5.0)

The Point of Presence will ultimately facilitate faster, more affordable service throughout the Town. As documented in the Service Costs attachment, the residents of Wright are currently facing DSL rates as high as $16.67/megabit. Visionary's proposal will facilitate the reduction of residential wireline rates to just $0.07/megabit, fulfilling a key objective of the NTIA Middle Mile Program.

To facilitate redundancy for the Town of Wright, Visionary will provide an in-kind contribution of a 40.2 -mile IRU on a 20-year term from the Wright Visitor Center – a federally assisted project and town-owned facility – to the Campbell County administrative building in Gillette, the central resource for numerous services provided by the County to the Town of Wright.

The Town of Wright uses County resources for a variety of critical services including motor vehicle services (DMV), emergency services (911 dispatch), and law enforcement. By linking the Town Hall POP to the Visitor Center IRU, the Town of Wright will have a high-capacity, diverse middle-mile connection to the County's administrative center. This middle-mile augment will ensure connectivity for the Town's mission-critical functions and will provide a substantial benefit to the Town and local residents alike.

The IRU will originate at an existing Visionary fiber facility at the Campbell County administrative building at 500 S Gillette Ave. in Gillette, Wyoming. The other end of the IRU will extend through existing Visionary middle-mile facilities and interface with the new middle-mile fiber contemplated by this application. Through the combination of the IRU of existing Visionary fiber assets and new fiber construction funded by this NTIA application, the fiber will ultimately terminate at the Wright Visitor Center, located at 15089 Hwy 387 in Wright.

Visionary's proposed middle-mile project has two primary objectives. The proposal will support last-

mile broadband service in Oriva Hills, a neighborhood about 10 miles west of Gillette, Wyoming where the majority of residents are underserved and other residents are unserved altogether. The proposal will also facilitate more afford

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**Applicants are encouraged to upload supplemental documentation.**

SA Service Availability-09-30-2022 12-34-Visionary Communications, LLC-GRN-000835.zip, SA FINAL Interconnection Points MR 9-29-22-09-30-2022 12-34-Visionary Communications, LLC-GRN-000835.xlsx, FINAL Route Miles MR 9-26-22-09-30-2022 12-34-Visionary Communications, LLC-GRN-000835.csv

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**Competitive Landscape**

**The Applicant should describe existing middle mile offerings in the area, if any, including competitor data if applicable. This should include a description of the proposed service offerings, including the pricing and technology of the services to be offered over the proposed facility. Where possible, Applicant's project should be able to demonstrate a decline in middle mile costs that are likely to flow through to consumer broadband prices.**

**This response is limited to 6000 characters as an open field narrative.**

Last-mile service in Oriva Hills and the Town of Wright is currently provided via fixed wireless or DSL. However, there are no middle-mile offerings available within the Town of Wright itself or along the proposed route for Oriva Hills. This would change if NTIA were to fund Visionary's proposed project. The proposed project would make Visionary Communication's NTIA-funded middle-mile open to interconnection. Specifically, third parties would be allowed to interconnect at any technically viable point along the funded middle-mile route, including the Wright POP and splice points. Visionary can facilitate interconnection from any facility where we have a presence today, including but not limited to vaults, towers, Central Offices and other third-party facilities.

Visionary offers custom solutions on a nondiscriminatory basis to business and enterprise customers, including other carriers. This diverse solution set includes lit services, dark fiber and layer 2 managed services. Visionary's success has been built upon competitive pricing. If the proposed project is funded, Visionary will continue to offer custom solutions at competitive pricing on a nondiscriminatory basis.

In the broader Campbell County area, middle-mile services are available from ACT and CenturyLink/Lumen. Pricing varies widely depending on speed, route, available capacity and the presence of alternative providers.

Though direct cost comparisons aren't possible because middle-mile services aren't currently available along the proposed routes, the project would enable third-party providers to expand and improve last-mile fiber and fixed wireless services, ultimately introducing more competition and lowering costs for consumers.

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**Applicants are encouraged to upload supplemental documentation.**

SA Service Availability-09-30-2022 12-35-Visionary Communications, LLC-GRN-000835.zip

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**Type of technology to be used in proposal:**

Fiber Optic Technology;Wireless

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**Each applicant of an award to build middle mile infrastructure using fiber optic technology shall certify that the proposed project, upon completion, will include direct interconnection facilities that will facilitate the provision of lit broadband service, at speeds not less than 1 Gigabit per second for downloads and 1 Gigabit per second for uploads to anchor institutions located within 1,000 feet of the middle mile infrastructure, as detailed in the Template CAI below.**

**Do you agree to certify to the above?**

Yes

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**Upload Template CAI. Required for Fiber Optic Technology, optional for Wireless or Other.**

FINAL Community Anchor Institution List MR 9--09-26-2022 05-34-Visionary Communications, LLC-GRN-000835.xlsx

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**An eligible entity applying for a middle mile grant may seek, and the Assistant Secretary may grant, a waiver of the requirements set out in the previous paragraph, in full or in part, to the extent the eligible entity demonstrates that the requirement is not technically or economically feasible.**

**Do you plan to apply for a waiver? If yes, please attach the waiver application in the Application Workspace, the Application Information section, Required Documents under Required Document Question 4 "Additional Waiver Upload".**

No

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**Network Route Maps**

**Applicants should provide a physical network map that includes the following (if applicable):**

**The Project Area and those unserved and underserved areas which it will enable.**
**Applicant‘s pre-existing service area that demonstrates current service levels.**
**The physical path of the network‘s transmission medium (e.g., backbone and lateral cable routes, microwave links), transmission type, technology, operating bandwidth, capacity (e.g., dark vs. lit strand count), and cable placement (e.g., aerial, burial) should be displayed.**
**Points of interconnection (purely passive and non-environmentally controlled nodes, e.g., splice**

**points are optional):Provider Facilities**
**Collocation Facilities**
**Private Interconnection Points with partnering service provider/private network**

**Wireless towers and associated coverage areas.**
**Anchor institutions within 1,000 feet, if desired.**
**Additionally, the maps should delineate between network and facilities that are:Part of the Applicant's/key partners' existing network;**
**Proposed as part of this project;**
**Leased from a third party;**
**Utilized under some alternative arrangement; or**
**Relevant to interconnection with either Last Mile or Middle Mile service providers.**

**PLEASE NOTE: Only ESRI Shapefiles will be accepted and uploaded.**

Network Map SHP-09-30-2022 12-37-Visionary Communications, LLC-GRN-000835.zip
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**Data Submission Specification**

**There is a template "Upload Template Data Submission Specification" which shall be uploaded. Applicants must complete the table with information for all interconnection points proposed for the network. This table has three required fields: Point Name, Latitude and Longitude. This should accommodate all of the points of interconnection (passive, non-environmentally controlled points of interconnection, e.g., splice points, may be excluded), collocation facilities, central offices, head ends, and other centralized facilities, network access points to Last Mile service providers, Internet peering points, and towers.**

Data Submission-09-30-2022 12-41-Visionary Communications, LLC-GRN-000835.zip
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**Network Diagram**

**The Applicant must provide a high-level network diagram to be uploaded for the project that is a representation of the network, capacities, and facilities. The diagram must clearly denote which of the network elements already exist. The diagram should show:**

**The links between the network nodes. The types of facilities used in connecting the network elements (fiber, wireless microwave, etc.).**

**The points of interconnection and collocation facilities, including Internet peering points, access to local exchange carriers, central offices, or cable head ends.**

**The proposed aggregation node facilities that will provide the egress point(s) from the broadband backbone to the networks of the selected service provider(s), named Last Mile service providers, and the selected named Internet Service Provider(s) in the new infrastructure.**

**The Applicant should show which technologies are used and include bandwidth capacity constraints.**

SA FINAL Network Diagram AM 9-23-22-09-30-2022 12-41-Visionary Communications, LLC-GRN-000835.pdf

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**Environmental Narrative**

**Any project-related activity that may adversely affect the environment must not be undertaken prior to the completion of the environmental review process prescribed by NTIA. Doing so may jeopardize consideration of the application.**

**All Applicants for MMG projects must comply with the National Environmental Policy Act, the National Historic Preservation Act, and the Endangered Species Act, and other applicable environmental regulations.**

**Please provide a service-area environmental description that describes the physical project area and its surroundings (e.g., disturbed or developed land vs. open space; adjacent natural resources, such as rivers, wetlands, or forestlands; and any protected lands or resources in or near the project area), including site photographs and aerial photographs (e.g., Google Earth or Google Maps images), if the project includes construction and/or ground disturbing activities.**

**This response is limited to 12000 characters as an open field narrative with image files to be uploaded.**

The proposed fiber deployment in Wright will require underground placement of conduit and fiber within existing municipal rights-of-way in the Town of Wright. The project will require 6,009 linear feet of ground disturbance at a minimum depth of 4 feet, with conduit placed via trenching, plowing or boring. The route is entirely within previously developed lands and will not intersect state or federal lands. Construction is estimated to take 5-10 business days. Equipment may include directional drills, trenchers, vibratory plow, hydrovac, reel trailers and trucks. According to the USFWS National Wetlands Inventory, a single seasonal streambed is intersected by the proposed route. The streambed, classified as R4SBC, is already impacted by Hwy 387. (see Wetlands Map attachments) The proposed fiber deployment in Wright meets all conditions of the Categorical Exclusion checklist and will not

necessitate a NEPA Environmental Assessment.
The proposed fiber build to the West IGO tower site will require underground placement of fiber and conduit within existing city and county rights-of-way, as well as private easements. Placement will fall within previously disturbed grassland along county roads and no greenfield development is anticipated. The project will require 65,221 linear feet of ground disturbance at a minimum depth of 4 feet, with conduit placed via trenching, plowing or boring. Construction is estimated at 15-30 business days. Equipment may include directional drills, trenchers, vibratory plow, hydrovac, reel trailers and trucks. The build intersects a single parcel managed by the State of Wyoming but no federal lands are impacted.
The proposed route will intersect wetland habitat previously impacted by road, drainage and utility construction. According to the USFWS National Wetlands Inventory, impacted habitats are identified as R4SBC seasonal streambeds and PEM1A habitat, where the water table is below the soil surface for most of the year.
In addition, two tower sites will be constructed on previously developed land in Oriva Hills. The sites will each require the installation of a 50-foot Rohn tower, 64-square-feet concrete pad and NEMA enclosure. Construction is estimated at 45 days, with trucks and excavation equipment needed on-site. USFWS mapping indicates no wetlands will be impacted by either tower site.
According to the USFWS IPaC report, none of the project areas will affect animals on the endangered species list or critical habitats. (see USFWS IPaC report attachments.)
The fiber built to the West IGO site and tower builds in Oriva Hills meet all conditions of the Categorical Exclusion checklist. As such, Visionary believes this portion of the project is eligible for a Categorical Exclusion and will not necessitate a NEPA Environmental Assessment.
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**Upload Map Images:**

SA Environmental Documentation-09-30-2022 12-44-Visionary Communications, LLC-GRN-000835.zip, Climate Resilience Criteria responses MR 1-27-01-27-2023 01-59-Visionary Communications, LLC-GRN-000835.docx
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**Template Table of Funded Partners and Unfunded Collaborators**

**List all funded and unfunded project collaborators, including partners, subrecipients, match providers, major contractors/supplies, details on role/scope of work for project. A fillable Template of Funded Partners and Unfunded Collaborators can be found in found in the MMG ZIP folder.**

FINAL Table of Partners and Unfunded Collabor-09-30-2022 12-45-Visionary Communications, LLC-GRN-000835.xlsx
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**Certificate of Operational Capability**

**Each applicant must supply a certification from an officer-level employee (or individual of**

**comparable rank) attesting to the applicant's operational capability to complete and operate the proposed project.**

**If the applicant has provided a voice and/or broadband internet access service, it must supply a certification from an officer-level employee (or individual of comparable rank) attesting that it has filed FCC Form 477s and the Broadband DATA Act submission, if applicable, to the extent required during this time period and otherwise complied with the Commission's rules and regulations. Alternatively, the applicant must explain any pending or completed enforcement action, civil litigation, or other matter in which it was alleged to have failed to comply with Commission rules or regulations.**

**If the applicant has operated only an electric transmission or distribution service, it must submit qualified operating or financial reports that it has filed with the relevant financial institution for the relevant time period along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution.**

**If applicable, the applicant must submit a certification from an officer-level employee (or individual of comparable rank) that is has operated a middle mile broadband network for at least two years or that it is a wholly owned subsidiary of such an entity and must specify the number of years the applicant or its parent company has been operating.**

FINAL Certificate of Operational Capability-09-30-2022 12-45-Visionary Communications, LLC-GRN-000835.pdf

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**Certification of Financial Capability**

**Each applicant must supply a certification from an officer-level employee (or individual of comparable rank) attesting that it is financially qualified to meet the obligations associated with a project, that they will have available funds for all project costs that exceed the amount of the grant, and that they will comply with all MMG Program requirements, including service milestones.**

FINAL Certificate of Financial Capability-09-30-2022 12-45-Visionary Communications, LLC-GRN-000835.pdf

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**Letter of Credit**

**During the application process, each applicant must submit a letter from a bank meeting eligibility requirements consistent with those set forth in 47 C.F.R. § 54.804(c)(2) committing to issue an irrevocable stand-by letter of credit, in the required form, to the applicant. The letter shall at a minimum provide the dollar amount of credit offered and the issuing bank's agreement to follow the terms and conditions of NTIA's model letter of credit. NTIA shall publish on its website a model letter**

**of credit substantially similar to the model letter of credit established by the Federal Communications Commission in connection with the Rural Digital Opportunity Fund (RDOF - Rural Digital Opportunity Fund Order, 35 FCC Rcd at 773-77, Appx. C.).**

**NTIA will ensure, prior to issuing a middle mile grant award, that each eligible entity obtains an acceptable, irrevocable standby letter of credit in a value of no less than 25 percent of the award amount.**

**Each eligible entity shall provide with its letter of credit an opinion letter from its legal counsel clearly stating, subject only to customary assumptions, limitations, and qualifications, that in a proceeding under Title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the "Bankruptcy Code"), the bankruptcy court would not treat the letter of credit or proceeds of the letter of credit as property of the winning bidder's bankruptcy estate under Section 541 of the Bankruptcy Code.**

FINAL LOC Letter BW 9-21-22-09-26-2022 06-01-Visionary Communications, LLC-GRN-000835.pdf

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**Audited Financial Statement (Previous 3 Years)**

**Each applicant shall submit financial statements from the most recent fiscal year that are audited by an independent certified public accountant. If the applicant is not audited in the ordinary course of business, in lieu of submitting audited financial statements it must submit unaudited financial statements from the three prior fiscal years and certify that it will provide financial statements from the three prior fiscal years that are audited by an independent certified public accountant by an NTIA specified deadline.**

***You must provide 3 years of audited financial statements.**

Visionary Communications FS 123120-09-26-2022 06-03-Visionary Communications, LLC-GRN-000835.pdf, Visionary FS 123119-09-26-2022 06-03-Visionary Communications, LLC-GRN-000835.pdf, 2021 Audited Financials - BKD-09-26-2022 06-03-Visionary Communications, LLC-GRN-000835.pdf

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**Historical Financial Statements (Previous 3 Years)**

**Each applicant shall submit financial statements from the three prior fiscal years that are audited by an independent certified public accountant. If the applicant is not audited in the ordinary course of business, in lieu of submitting audited financial statements it must submit unaudited financial statements from the three prior fiscal years and certify that it will provide financial statements from the three prior fiscal years that are audited by an independent certified public accountant by an NTIA specified deadline.**

***You must provide 3 years of historical financial statements.**

Visionary Communications FS 123120-09-26-2022 06-03-Visionary Communications, LLC-GRN-000835.pdf, 2021 Audited Financials - BKD-09-26-2022 06-03-Visionary Communications, LLC-GRN-000835.pdf, Visionary FS 123119-09-26-2022 06-03-Visionary Communications, LLC-GRN-000835.pdf, Section 1-09-26-2022 06-04-Visionary Communications, LLC-GRN-000835.5_VCN 2021_2020_Historical Financials.pdf

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**Budget Narrative**

**Applicants will create and submit a budget narrative that adequately describes all proposed activities and costs for their grant-funded project. Applicants must complete the file template, fill in all required information, and upload the file**
**. The file must be uploaded as a Word file, and not converted to a PDF. You can find additional guidance in the MMG Application Guidance.**

Budget Narrative and SA-09-30-2022 12-52-Visionary Communications, LLC-GRN-000835.zip, UPDATED Budget Narrative MR 10-20-22-10-20-2022 11-12-Visionary Communications, LLC-GRN-000835.docx, UPDATED Budget Narrative MR 10-21-22-10-21-2022 07-12-Visionary Communications, LLC-GRN-000835.docx, UPDATED Budget Narrative MR 10-24-22-10-24-2022 09-46-Visionary Communications, LLC-GRN-000835.docx, Corrected Budget Narrative MR 10-24-22-10-24-2022 10-08-Visionary Communications, LLC-GRN-000835.docx, Budget Narrative MR 1-13-23-01-27-2023 02-00-Visionary Communications, LLC-GRN-000835.docx, Budget Narrative MR 4-6-23-04-06-2023 01-20-Visionary Communications, LLC-GRN-000835.docx

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**Template Detailed Budget Justification**

**The Detailed Budget Justification spreadsheet must reflect the cost categories that appear on the SF-424 and SF-424C and include itemized calculations for each cost placed under those categories. A fillable Template Detailed Budget Justification can be found in found in the MMG ZIP folder.**

FINAL Detailed Budget Justificiation MR 9-28--09-30-2022 12-53-Visionary Communications, LLC-GRN-000835.xlsx, UPDATED Detailed Budget Justificiation MR 10--10-19-2022 06-48-Visionary Communications, LLC-GRN-000835.xlsx, UPDATED Detailed Budget Justificiation MR 10--10-21-2022 07-12-Visionary Communications, LLC-GRN-000835.xlsx, UPDATED Detailed Budget Justification MR 10-2-10-24-2022 09-46-Visionary Communications, LLC-GRN-000835.xlsx, CORRECTED Detailed Budget Justification MR 10-10-24-2022 10-08-Visionary Communications, LLC-GRN-000835.xlsx, Detailed Budget Justification MR 1-13-23-01-27-2023 02-00-Visionary Communications, LLC-GRN-000835.xlsx, Detailed Budget Justification MR 4-6-23-04-06-2023 01-20-Visionary Communications, LLC-GRN-000835.xlsx

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**Any other funding provided for this project?**

No

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**Template Pro Forma**

**Pro forma financial projection and analysis related to the project's sustainability, inclusive of subscriber (e.g., last mile network connections, other wholesale services), across an eight-year forecast period. A fillable Template Pro Forms can be found in the MMG ZIP folder.**

Pro Forma and SF 424c-09-30-2022 12-50-Visionary Communications, LLC-GRN-000835.zip, Pro Forma MR 1-16-23-01-27-2023 02-00-Visionary Communications, LLC-GRN-000835.xlsx, Pro Forma Assumptions 3-31-23-04-06-2023 01-22-Visionary Communications, LLC-GRN-000835.xlsx, Pro Forma MR 3-31-23-04-06-2023 01-22-Visionary Communications, LLC-GRN-000835.xlsx

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