

Note: Form instructions and definitions will be created to support the report. Instructional guidance and training will be developed. Numbering to be updated based on final approved form.

RECIPIENT NAME	LIBERTY COMMUNICATIONS OF PUERTO RICO LLC	OMB Control No.	OMB Control No. 0660-0052
		Expiration Date	Exp. Date: 2/28/2027

Middle Mile Grant Program Bi-Annual Performance Report									
A. GENERAL INFORMATION									
1a. Recipient Organization:	LIBERTY COMMUNICATIONS OF PUERTO RICO LLC			1h. Award Identification Number:	72-40-MM972				
1b. Recipient Street Address:	279 AVE PONCE DE LEON			1i. Report Date (MM/DD/YYYY):	06/17/2025				
1c. City, State, and Zip Code:	SAN JUAN, Puerto Rico 00917-1920			1j. Final Report:	Yes		No	X	
1d. Unique Entity Identification (UEI) Number:	RMGRDEKLDG25			1k. Report Period Start Date (MM/DD/YYYY):	10/01/2024				
1e. Award Start Date (MM/DD/YYYY):	07/01/2023			1l. Report Period End Date (MM/DD/YYYY):	03/31/2025				
1f. Award End Date (MM/DD/YYYY):	06/30/2025								
1g. Name of Person Completing Report:	Jean Rene Santiago Cruz								
B. PROJECT NARRATIVE									
Please use the section below to provide a project narrative of the project(s). This section aims to help reviewers better understand what project is being proposed and steps taken to achieve this goal.									
2a. A brief description of the recipient’s organization and scope of work/project priorities.		Liberty Communications of Puerto Rico LLC is the leading provider of broadband internet and wireless services in Puerto Rico. With the support of the Middle Mile Grant Program and the NTIA, Liberty is committed to building 64 miles of new middle-mile infrastructure in strategic areas where we have received funding for last-mile services from the FCC’s Uniendo a Puerto Rico Fund, but where that funding is insufficient to cover middle-mile network costs. Liberty’s goal is to expand its network to ensure high-speed, reliable internet reaches underserved communities.							

<b>2b. An overview of the significant outputs and outcomes to be accomplished in the project.</b>	<p>Liberty Communications of Puerto Rico LLC’s main objective is to bridge the digital divide by distributing broadband to underserved areas, ensuring equal bandwidth as better-served counterparts in Puerto Rico. With 64.99 miles of middle mile infrastructure connecting 7 municipalities to the network's backbone, Liberty Communications of Puerto Rico LLC aims to provide access to 367 unserved blocks and an additional 153 underserved census blocks. This infrastructure will not only benefit residences and businesses but also anchor institutions like hospitals, schools, police stations, and public housing. By extending broadband access to unserved and underserved areas, we believe that we can help bridge the digital divide, and in turn, generate educational and economic opportunity that will further benefit local communities. Our goal is to ensure equal access to vital social and economic opportunities for all residents.</p> <p>Additionally, by focusing on the installation of underground optic fiber, we expect this project will increase Puerto Rico’s middle mile infrastructure’s resilience to future atmospheric events, mitigating any loss of internet access during these crucial times and ensuring a speedier recovery of any lost access.</p>
<b>2c. How would the project meet the recipient’s business and/or administrative need(s)?</b>	<p>LCPR’s solution aims to provide fast and dependable service to both wholesale and retail customers. By utilizing best-in-class construction techniques, excellent materials, and engineering expertise, we can offer fiber broadband services with symmetrical speeds exceeding 1000 Mbps. This not only reduces latency by minimizing coaxial distribution but also extends connectivity to rural areas. Additionally, through open access interconnection with other service providers, we enable faster and more affordable internet access while promoting competition in the market.</p> <p>LCPR has a strong track record of building and operating middle-mile infrastructure since the late 1990s. With our commitment to connecting people at the forefront of our purpose, we have successfully built 1.16 million homes (80% of the island) over the past two decades. Our request for funds is primarily aimed at strengthening the middle-mile network in remote and underserved areas through last-mile deployments in broadband and mobile connections.</p>
<b>2d. Provide an overview of key accomplishments achieved for this reporting period on the MM infrastructure project.</b>	<p>During this reporting period, we completed 35.6 miles of fiber construction, advancing network deployment across multiple routes. Additionally, the Site Preparation milestone remains on track, with progress at the Portugués (Adjuntas) site and completion of the design phase for San Lorenzo DT. All required Right of Way approvals were secured, and the project successfully transitioned to the construction phase.</p>
<b>2e. Provide any roadblock experienced during this reporting period impacting the expansion of the MM infrastructure project (i.e., supply chain, availability of labor).</b>	<p>The primary challenge during this reporting period was the pending approval of state construction permits from the Department of Transportation and Public Works (DTOP) for the Ponce and Adjuntas routes. Liberty initially applied for these permits in November of 2023, but agency mistakes delayed approval. Although permit applications were resubmitted in March per the agency’s request, the continued lack of approval has impacted the construction timeline in these segments and delayed scheduled activities.</p> <p>No major issues have been reported related to supply chain logistics or labor availability. Additionally, the project is currently under consideration for a non-cost extension, which may help mitigate the overall impact of the permitting delays.</p> <p>As a result, the actual milestone completion percentages do not align with the anticipated milestone targets for this reporting period.</p>
<b>2f. Provide any barriers to improving job quality experienced during this reporting period.</b>	<p>The main barrier to improving job quality this period was the delay in getting construction permits from DTOP. This slowed down work in the Ponce and Adjuntas areas and affected how consistently teams could stay active on the project. No other major issues with wages, training, or staffing were reported.</p>

C. INFRASTRUCTURE MILESTONE CATEGORIES AND PROJECT TIMELINE
Please use the chart below to provide the start date and end date of your project.

OVERALL PROJECT	PROJECT DURATION	3a. PROJECT START DATE	3b. PROJECT END DATE										
	730	07/01/2023	06/30/2025										
<p>Please provide the start and end dates for each milestone category of your project. The duration is be based on the start and end dates of each category.</p> <p>Please use the table provided to indicate your EXPECTED percentage of completion on a bi-annual basis for each year of your project. Year 1 begins with your award start date.</p> <p>The percentage of completion should be based primarily on the expenditure of your project budget and should be reported cumulatively from award inception through the end of each semi-annual reporting period. For example, if you expect to complete a particular milestone within the first three periods of your project, the third period and all subsequent periods should state 100%.</p> <p>*** Period 1 ends September 30 and Period 2 ends March 31. Additional columns may be added for a Year 6, Period 1 or 2, Baseline if the Period of Performance is 5 years.</p> <p>Please write "0" in the duration field if your project does not include an activity. If necessary, please insert additional milestones at the end.</p>													
ANTICIPATED PROJECT MILESTONES***				Year 1 Baseline		Year 2 Baseline		Year 3 Baseline		Year 4 Baseline		Year 5 Baseline	
3c. MILESTONE CATEGORIES	3d. DURATION (Days)	3e. START DATE	3f. END DATE	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2
Overall Project	730	2023-07-01	2025-06-30	4%	29%	65%	91%	100%	100%	%	%	%	%
Environmental Assessment	94	2023-08-28	2023-11-30	36%	100%	100%	100%	100%	%	%	%	%	%
Network Design	124	2023-09-29	2024-01-31	2%	100%	100%	100%	100%	%	%	%	%	%
Rights Of Way	164	2023-11-06	2024-04-18	0%	89%	100%	100%	100%	%	%	%	%	%

Construction Permits And Other Approvals	150	2024-01-02	2024-05-31	0%	58%	100%	100%	100%	%	%	%	%	%
Site Preparation	312	2024-01-29	2024-12-06	0%	26%	86%	100%	100%	%	%	%	%	%
Equipment Procurement	59	2023-10-02	2023-11-30	0%	100%	100%	100%	100%	%	%	%	%	%
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	428	2024-04-01	2025-06-03	0%	0%	42%	85%	100%	%	%	%	%	%
Equipment Deployment	196	2024-06-24	2025-01-06	0%	0%	40%	100%	100%	%	%	%	%	%
Network Testing	422	2024-05-01	2025-06-27	0%	0%	35%	79%	100%	%	%	%	%	%
Status of Procurement	101	2023-08-21	2023-11-30	40%	100%	100%	100%	100%	%	%	%	%	%

Please use the table provided to indicate your ACTUAL percentage of completion on a bi-annual basis for each year of your project. Year 1 begins with your award start date.

The percentage of completion should be based primarily on the expenditure of your project budget and should be reported cumulatively from award inception through the end of each semi-annual reporting period. For example, if you expect to complete a particular milestone within the first three periods of your project, the third period and all subsequent periods should state 100%.

Please provide a brief description of the primary activities involved in meeting each milestone (a single description should be provided for each milestone, covering all periods in years one through N).

\*\*\* Period 1 ends September 30 and Period 2 ends March 31. Additional columns may be added for a Year 6, Period 1 or 2, Baseline if the Period of Performance is 5 years.

Please write the number “0” if your project does not include an activity. If necessary, please insert additional milestones at the bottom of the chart. Please add additional milestones as applicable.

ACTUAL PROJECT MILESTONES***		Year 1		Year 2		Year 3		Year 4		Year 5	
		Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2
4a. MILESTONE	4b. DESCRIPTION	Actual Milestone Completion (Cumulative)									
Overall Project	The project continues to progress across multiple key milestones with several foundation phases - environmental asesment, network design, equipment procurement, and rights of way - already completed. While 35.6 miles of fiber have been deployed, pending state permits for the southeastern segment remain a critical factor affecting timely completion of the construction activities, scheduled for June.	4%	29%	29%	64%						
Environmental Assessment	This milestone had been previously completed in February 2024, ensuring a solid foundation for the subsequent phases of our project.	56%	100%	100%	100%						
Network Design	This milestone had been previously completed in December 2023, ensuring a solid foundation for the subsequent phases of our project.	2%	100%	100%	100%						
Rights Of Way	During this phase, finished in February 2025, we focused on securing access and permits required for the rights of way, ensuring alignment with tower providers. With all approvals in place and the Notice to Proceed (NTP) received, we have successfully completed the milestone and handed off the project to the construction team for the next phase.	0%	89%	89%	100%						
Construction Permits And Other Approvals	The approval of state construction permits remains a critical milestone for enabling scheduled fieldwork under the Middle Mile project. As of this reporting period, permits from the Department of Transportation and Public Works (DTOP) for the Ponce and Adjuntas segments—including routes 2 and 3—are still pending. While municipal permits have been secured, the absence of state-level authorization continues to delay the start of construction in these areas. All required documentation has been submitted through DTOP’s digital platform, and the project team is actively tracking this milestone to ensure alignment with the broader project schedule and deliverables.	0%	58%	58%	74%						

Site Preparation	The Site Preparation milestone is currently on track, activities at the Portuguese (Adjuntas) site are advancing as planned while the San Lorenzo DT site has completed its design phase and is transitioning to the next stage of execution.	0%	26%	26%	86%						
Equipment Procurement	This milestone had been previously completed, ensuring a solid foundation for the subsequent phases of our project.	0%	100%	100%	100%						
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	35.6 miles of fiber construction have been completed to date, advancing overall project deployment. Pending state permits for southeastern routes remain a critical path risk to achieving the planned June 2025 completion.	0%	0%	0%	56%						
Equipment Deployment	No new updates to report at this time, but our team remains prepared and ready to advance as soon as conditions permit.	0%	0%	0%	0%						
Network Testing	No new updates to report at this time, but our team remains prepared and ready to advance as soon as conditions permit.	0%	0%	0%	0%						
Status of Procurement	This milestone had been previously completed, ensuring a solid foundation for the subsequent phases of our project.	40%	100%	100%	100%						

Subrecipient and Subawards											
List of Subrecipient(s) that received a subaward or subcontract from the eligible entity and a description of the specific project for which grant funds were provided.											
Associate projects names to any subrecipient or subaward associated with grant, approved grant funds, and expenditures to date.											
5a. Project Name	Status	5b. Project Description	5c. Subrecipient	5d. Minority Business Enterprise (MBE)	5e. Women's Business Enterprise (WBE)	5f. Labor Surplus Area Firm	5g. Awarded Funds	5h. Expenditur es to Date	5i. Remaining Grant Balance	5j. % of work complete	



6a. Project inspection fees	\$76,312.60	\$79,427.40	\$155,740.00	\$35,726.39	\$37,184.61	\$72,911.00	47%
6a. Site work	\$538,573.21	\$560,555.79	\$1,099,129.00	\$348,108.42	\$362,316.93	\$710,425.35	65%
6a. Demolition and removal	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Construction	\$7,305,764.36	\$8,914,049.31	\$16,219,813.67	\$5,076,284.19	\$5,282,447.67	\$10,358,731.86	69%
6a. Equipment	\$466,872.04	\$519,885.96	\$986,758.00	\$386,405.35	\$402,176.99	\$788,582.34	83%
6a. Miscellaneous	\$338,360.44	\$352,171.06	\$690,531.50	\$162,797.42	\$165,024.40	\$327,821.82	48%
6a. Subtotal	\$9,303,468.52	\$11,027,250.33	\$20,330,718.85	\$6,415,229.50	\$6,674,966.33	\$13,090,195.83	69%
6a. Contingencies	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Totals	\$9,303,468.52	\$11,027,250.33	\$20,330,718.85	\$6,415,229.50	\$6,674,966.33	\$13,090,195.83	69%

E. COMMUNITY BENEFIT AGREEMENT



As stated in the MM Grant Program NOFO a Community Benefit Agreement (CBA) is an agreement signed by community benefit groups and a developer, identifying the community benefits a developer agrees to deliver, in return for community support of the project.	
Please use the fields below to state the Community Benefit Group and Developer Name and describe the activities in how this partnership has supported with the Middle Mile Infrastructure project (i.e. wage agreements, targeting hiring of apprentices and disadvantaged groups in labor marker, education and training opportunities, sub-contracting to local small business for construction, services, and supply chain needs).	
Description of Community Agreement	
7a. Community Benefit Group Name: Please provide the name of the Community Benefit Group	These questions were answered via file upload. Number of Community Agreements: 0 File(s) Uploaded with Responses:
7b. Developer Name: Please provide the name of the Developer.	
7c. Community Benefit Group and Developer Partnership: Please describe in the space below the nature of the partnership and how the MM grant funds being used are assisting to provide community support for the infrastructure project.	

F. CLIMATE RESILIENCE
Recipients must demonstrate that they have sufficiently accounted for current and future weather and climate related risks to new MM infrastructure projects. At present, weather and climate related risks to broadband networks include wildfires, extreme heat and cold, inland and coastal flooding, and the extreme winds produced by weather events such as tornadoes, hurricanes, and other weather events. Because retrofitted and new infrastructure for broadband might be expected to have a lifetime of 20 years or more, recipients must account not only for current risks but also for how the frequency, severity, and nature of these extreme events may plausibly evolve as our climate continues to change over the coming decades.
Climate Resiliency Risk Mitigation
This purpose of this section is for the recipient to demonstrate that they have sufficiently accounted for current and future weather and climate-related risks to new MM infrastructure projects. In particular, each recipient should demonstrate how they've addressed the known and identifiable risks of current and future projected weather and climate conditions through measures such as (but not limited to) choice of a technology platform suitable to the climate risk of the region, reliance on alternatives siting of facilities (i.e., underground construction where appropriate), retrofitting, or hardening of existing assets, and use of network redundancy to safeguard against threats to infrastructure.
8a. Were any geographic areas identified for this reporting period subject to an initial and/or updated hazard screening for future weather and climate related risk? If so, please provide the date of the screening and provide related documentation as an attachment to this report.

No			
8b. Climate Resilience Category	8c. Date of Most Recent Hazard Screening	8d. Name and Title of Representative Completing Most Recent Hazard Screening	8e. Date of Report Completion
No files uploaded for Hazard Screening.			
8f. Identified Risk: For your MM project, what are the potential weather and climate hazards that may be most important to be addressed that could impact the resiliency of the middle mile infrastructure deployed (i.e. wildfires, extreme heat and cold, inland and coastal flooding, extreme winds: tornadoes, hurricanes and other weather events)?			
Hurricane Maria's impact on Puerto Rico in 2017 highlighted the vulnerabilities of the island's infrastructure. Liberty recognizes the need for climate-conscious infrastructure due to the increased frequency and severity of extreme weather events predicted for the region. Liberty aims to upgrade the existing network to ensure connectivity, particularly during emergencies. NOAA forecasts more frequent and severe hurricanes and flooding events, as well as coastal erosion and sea level rise for Puerto Rico's future. Hurricane Maria's impact on Puerto Rico in 2017 highlighted the vulnerabilities of the island's infrastructure. Liberty recognizes the need for climate-conscious infrastructure due to the increased frequency and severity of extreme weather events predicted for the region. Liberty aims to upgrade the existing network to ensure connectivity, particularly during emergencies. NOAA forecasts more frequent and severe hurricanes and flooding events, as well as coastal erosion and sea level rise for Puerto Rico's future.			
8g. Weather and Climate Hazards: Were any significant climate or weather hazards experienced during this reporting period (i.e., floods, tornados) impacting infrastructure buildout or service? Briefly describe how you monitored for weather and climate caused issues for the reliability of the system. If so, please provide the date of the disaster, location and backup documentation related (i.e., news articles).			
No  No significant climate or weather hazards were experienced during this reporting period that impacted infrastructure buildout or service. We continuously monitor weather and climate conditions to ensure the reliability of our system, but no incidents requiring backup documentation occurred during this time.			
8h. Risks to Deployment of New Infrastructure: Has the team identified any risks impacting the deployment of new or repaired infrastructure due to current and future weather and climate-related threats during this reporting period?			

No
<b>8i. Risk Mitigation:</b> How will the project avoid and/or mitigate the risk identified? If not applicable, please explain why.
No risks impacting the deployment of new or repaired infrastructure due to current and future weather and climate-related threats were identified during this reporting period.
<b>8j. Additional Information:</b> Is there any additional information you would like to share during this reporting period that the grant team should be aware of regarding the management of sustainable climate resiliency for your MM project?
N/A
<b>8k. Additional Resources</b> Has the team utilized the available resources to assist with mitigation and long-term planning efforts for this reporting period? If so, which resources? 2018 National Climate Assessment NOAA's 2022 State Climate Summaries NOAA Disaster and Risk Mapping Tool NOAA's Storms Event Database NOAA Climate Explorer and Digital Coast FEMA National Risk Index Consulted FEMA-approved Hazard Mitigation Plans prepared by states in which they propose to build middle mile infrastructure to help identify key risk and hazards
Yes  During this reporting period, our team has effectively utilized available resources to support both risk mitigation and long-term planning efforts. Specifically, we have referenced the following tools and datasets: 2018 National Climate Assessment NOAA's 2022 State Climate Summaries NOAA Disaster and Risk Mapping Tool NOAA Storm Events Database NOAA Climate Explorer and Digital Coast These resources have been instrumental in guiding our decision-making and strengthening the project's long-term sustainability and resilience strategy. It is important to note that FEMA’s National Risk Index does not provide a detailed risk assessment for Puerto Rico. As such, its direct applicability to our geographic area is limited.

G. Workforce

For projects receiving over \$5,000,000 (based on expected total cost), as determined by the U.S. Secretary of Labor by subchapter IV of chapter 31 of title 40, United States Code (commonly known as the "Davis-Bacon Act"), all laborers and mechanics employed by contractors and subcontractors in the performance of such project are paid wages at rates not less than those prevailing.

Davis-Bacon Certification

9a. Does the recipient have access to the information requested (all laborers and mechanics employed by contractors and subcontractors in the performance of such project are paid wages at rates not less than those prevailing?)

No

Local Hire Prioritization and Impact

Local hiring is a goal or requirement to hire people who live close to the place of work. This aim is often more specifically structured as a requirement for contractors awarded certain types of publicly funded projects to recruit a certain proportion of the people working on the project from a particular area. Please **provide all direct hires and contractors supporting** the MM Infrastructure project.

Please use the table below to describe how the project prioritizes local hiring.

Hires by Race, Ethnicity and Sex	Number of Hires																					
	Race/Ethnicity																					
	9b. Hispanic or Latino			9c. Non-Hispanic/Non-Latino																		Totals
				9c-1. Men						9c-2. Women												
	9b-1. Men	9b-2. Women		White	Black or African American	Native Hawaiia n or Pacific Islander	Asian	Native America n or Alaska Native	Two or More Races	White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More Races							
Number of Local Direct Hires	17	9		0	1	0	0	0	0	0	0	0	0	0	0							
Number of Non-Local Direct Hires	0	0		0	0	0	0	0	0	0	0	0	0	0	0							0

Percentage of Local Direct Hires on Award	100%	100%		0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%							
Number of Local Subcontractors	85	8		0	0	0	0	0	0	0	0	0	0	0	0							93
Number of Non-Local Subcontractors	0	0		0	0	0	0	0	0	0	0	0	0	0	0							0
Percentage of Local Subcontractors on Award	100%	100%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%							

Davis-Bacon Act Wages	
Please confirm if wages are at least prevailing*	
*As stated in the MM NOFO as determined by the U.S. Secretary Labor in accordance with subchapter IV of chapter 31 of title 40, United States Code (commonly known as the "Davis-Bacon Act"), for the corresponding classes of laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the State (or the District of Columbia) in which the work is to be performed.	
10a. Are wage rates at least the Davis-Bacon prevailing wage for all laborers?	No
10b. Please cite your source of how this information was gathered (for 10a).	We requested and obtained supporting documentation from our construction contractor and our Human Resources Department.

10c. Are wage rates at least the prevailing wage for all mechanics?	No
10d. Please cite your source of how this information was gathered (for 10c).	We requested and obtained supporting documentation from our construction contractor and our Human Resources Department.
10e. If you answered "No" to either 10a. or 10c., please provide an attachment reporting the wages and benefits of workers on the project by job classification, and whether those wages are less than the prevailing wage.	Liberty Demographic Data March 2025.xlsx, ENZO Demograpfic March2025.xlsx, ANCHOR GROUP March2025.xlsx, BLDM Demographic Data March 2025.xlsx, NETCOM Demographic Data March -2025.xlsx

Workforce Demographic Data																						
Jobs by Race, Ethnicity and Sex	Number of Jobs																					
	Race/Ethnicity																					
	11-a. Hispanic or Latino			11b. Non-Hispanic/Non-Latino																		Totals
				11b-1. Men						11b-2. Women												
	11a-1. Men	11a-2. Women		White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More Races	White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More Races							
Jobs Created	0	0		0	0	0	0	0	0	0	0	0	0	0	0						0	

Workforce Demographic Data																						
Jobs Retained	84	8		0	1	0	0	0	0	0	0	0	0	0	0							93

Unionized Workforce	
12-a. Does this project include some workforce elements that are unionized?	No
12-b. Are workers provided access to union educators/organizers on employer property or during the work day?	No
12-c. Does your MM project utilize a project labor agreement?	No
12-d. Did workers receive additional information or training about their workplace rights in addition to already required notice postings?	No

H. Workforce Continuity Plan National Labor Relations Act (29 U.S.C. 158 (f))
As stated in the MM NOFO, if a recipient has not provided a certification that a project either will use a unionized project workforce or included a project labor agreement, meaning a pre-hire collective bargaining agreement consistent with section 8(f) of the National Labor Relations Act (29 U.S.C. 158 (f)), then the recipient must provide a project workforce continuity plan.
Workforce Continuity Plan
13a. Please describe the steps taken to ensure the project has ready access to a sufficient supply of appropriately skilled and unskilled labor to ensure construction is completed skillfully throughout the project's life (as required in Section III.B of the MM NOFO). As stated in the MM NOFO, the middle mile grant recipient is capable of carrying out the proposed project in a competent manner, including a plan to attract or retain an appropriate skilled and credentialed workforce.
Workforce Strategy and Readiness  To ensure the Middle Mile (MM) project maintains consistent access to a skilled and appropriately staffed workforce, Liberty LCPR has implemented a comprehensive workforce strategy aligned with the project’s

construction and compliance needs.

Team Structure and Expertise

The project team was assembled based on demonstrated expertise across engineering, construction, permitting, and project oversight. This includes a balanced mix of skilled and unskilled labor to support field activities effectively throughout the project’s lifecycle.

Recruitment and Talent Pipeline

Liberty LCPR follows a structured recruitment and selection process that evaluates candidates based on academic background, technical certifications, relevant experience, and field-readiness. Job opportunities are shared with specialized institutions and technical colleges to attract qualified candidates. The hiring process includes technical assessments and background checks to ensure the reliability and competency of all personnel.

Retention and Workforce Stability

Ongoing communication, safety training, and alignment with project milestones help maintain workforce engagement and retention. Labor resources are allocated according to evolving project needs to ensure continuity in the construction timeline.

Diversity and Inclusion

Liberty LCPR is committed to building an inclusive workforce that reflects local communities. Team composition reflects a mix of gender, ethnicity, and roles across contractors and partner firms, supporting equitable access to employment opportunities.

Through this integrated workforce approach, the MM project is well-positioned to complete construction activities skillfully and in compliance with the requirements outlined in Section III.B of the MM NOFO.

For your MM project, please provide a brief description of efforts made to attract, train or retain a skilled and credentialed workforce.

Efforts to Attract, Train, and Retain a Skilled Workforce – Middle Mile Project

In alignment with Section III.B of the MM NOFO, our construction and labor contractor, BLDM, has implemented a comprehensive workforce strategy to ensure continued access to appropriately skilled and unskilled labor throughout the project’s lifecycle.

Key Workforce Initiatives:

1. Targeted Recruitment:

BLDM uses a proactive recruitment approach, advertising through industry channels, municipalities, staffing agencies, and educational institutions. Weekly participation in job fairs across the Island and digital outreach help maintain a strong pipeline of candidates.

2. Ongoing Training Programs:

In-house training is provided to address skill gaps, covering technical, safety, supervisory, and management competencies for both skilled and unskilled workers.

Professional Certifications:

BLDM supports employees in earning relevant certifications, offering financial assistance and access to preparation materials to validate and enhance their qualifications.

3. Registered Apprenticeships:

Structured apprenticeship programs, developed in collaboration with workforce entities (e.g., Conexión Laboral, WIOA-funded consortia, nonprofit and industry partners), offer hands-on training under experienced mentors, creating pathways into the construction workforce.

4. Labor-Management Collaboration:

BLDM fosters strong communication and cooperation between labor and management, including regular meetings to address workforce needs and ensure alignment with project demands.



<p>5. Strategic Partnerships:</p> <p>Over 80 partnerships have been established with universities, technical colleges, professional associations, and community-based organizations. These collaborations support internships, job shadowing, and access to training resources that expand the project’s talent pool.</p> <p>Together, these coordinated efforts ensure that the Middle Mile project is staffed with a competent, credentialed, and resilient workforce capable of meeting construction goals throughout the project’s duration.</p>
<p>Has the team offered any of the following resources to assist with maintaining a sufficient supply of appropriately skilled labor force for this reporting period? If so, which resources (please provide a brief description of any of the following that apply):</p> <p>Professional Certifications</p> <p>In-House Training</p> <p>Registered Apprenticeships</p> <p>Labor-Management Partnerships</p> <p>Partnerships with entities like unions, community colleges, or community-based groups</p>
<p>N/A</p>
<p>13b. Please describe below, the steps taken to minimize risks of labor disputes and disruptions that would jeopardize the timeliness and cost-effectiveness of completing the MM project.</p>
<p>The employees assigned to the MM project are not unionized. The team is engaged in particular tasks based on their current roles with assigned deadlines for competent completion of the project. LCPR has a detailed and thorough Employee Manual, policies, and protocols in place, which cover matters ranging from wages, benefits, equal employment opportunities, internal hiring policy, policies impacting career development, and antidiscrimination and anti-retaliation policies, among others. It also has an open-door policy and a Speak Up channel for employees to voice their concerns (anonymously) regarding any possible irregularities or noncompliance, which goes hand-in-hand with a strictly enforced anti-retaliation policy. Furthermore, our main labor and construction contractor (BLDM) has put in place the following steps to minimize risks of labor disputes and disruptions:</p> <ol style="list-style-type: none"><li>1. Clear Communication: BLDM has established a transparent communication channel between management and labor to ensure that expectations, project timelines, and potential issues are communicated and understood by all parties involved. Regular meetings, updates, and open-door policies are in place to facilitate effective communication.</li><li>2. Comprehensive Contracts: BLDM ensures that all labor contracts are comprehensive and clearly outline the roles, responsibilities, terms of employment, and dispute resolution mechanisms. Contracts also address potential issues such as work stoppages, and dispute escalation procedures.</li><li>3. Fair and Equitable Employment Practices: BLDM has in place fair and equitable employment practices to foster positive relationships between management and labor. This includes providing competitive wages, benefits, and opportunities for advancement, as well as addressing any grievances or concerns promptly and fairly.</li><li>4. Training and Skill Development: BLDM invests in training programs to enhance the capabilities of the workforce. Well-trained and skilled employees are less likely to encounter issues or make mistakes that could lead to disputes or disruptions. Additionally, providing opportunities for career advancement can improve employee morale and reduce turnover rates.</li><li>5. Proactive Issue Resolution: BLDM has implemented proactive strategies for identifying and addressing potential issues before they escalate into disputes or disruptions. This includes regular channels for feedback and addressing any concerns or grievances in a timely and respectful manner.</li><li>6. Collaboration and Conflict Resolution: BLDM fosters a collaborative working environment where issues can be addressed through constructive dialogue and conflict resolution techniques. BLDM encourages open communication, active listening, and compromise to resolve disputes amicably and prevent escalation.</li><li>7. Compliance with Labor Laws and Regulations: BLDM complies with all relevant labor laws, regulations, and industry standards to minimize the risk of disputes and legal complications. Our HR Department keeps employees and management informed about any changes or updates to labor laws and takes proactive measures to adapt policies and practices accordingly.</li><li>8. Engagement with Professional Organizations: BLDM has positive relationships with labor organizations and trade associations to facilitate constructive dialogue and collaboration. Engaging with these organizations can help identify potential issues that affect our staff early on and work towards mutually beneficial solutions.</li><li>9. Contingency Planning: BLDM has developed contingency plans to mitigate the impact of potential labor disputes or disruptions on project timelines and costs. This includes identifying alternative sources of labor, implementing backup strategies, and maintaining open communication with stakeholders.</li><li>10. Regular Monitoring and Evaluation: BLDM continuously monitors labor relations, project progress, and potential risk factors to identify any emerging issues or areas for improvement. This evaluation and assessment of labor management practices help to address issues proactively and ensure the timely and cost-effective completion of our projects.</li></ol>
<p>13c. Please describe below the steps to ensure a safe and healthy workplace that avoids delays and costs associated with workplace illnesses, injuries, and fatalities.</p>

<p>LCPR takes a comprehensive approach to the health and safety of its employees and those of its contractors. Our company’s average tenure is 12 years, three times the average of the U.S. In 2018, we won local and national Psychologically Healthy Workplace awards from the American Psychological Association as well as back-to-back Aon Workplace of the Year. Furthermore, in the past, LCPR’s technical staff has obtained the following training depending on their roles and responsibilities:</p> <ul style="list-style-type: none"><li>o Defensive driving: Puerto Rico Automobile Accident Compensation Administration (ACCA, as its Spanish acronym) yearly orientations and additional internal workshops provide for fleet maintenance.</li><li>o Bucket Trucks.</li><li>o Training by role:</li><li>o All technicians were given the following training:</li><li>o EPP (Personal Protective Equipment)</li><li>o Electrical Safety</li><li>o Stairs Management</li><li>o Heatstroke</li><li>o Back Protection</li><li>o Work area security (traffic management)</li><li>o Defensive driving</li><li>o In addition to the previous training, the Line Techs received Bucket Trucks training.</li><li>o Lock Out -Tag Out: Facilities team.</li><li>o Fire extinguishers: Facilities team has training.</li><li>o Forklift handling - Warehouse equipment – annual</li><li>o General Security - All LCPR.</li><li>o First aid: We are in the process of recertifying and certifying a total of 40 people and adding a few % more to cover all offices and operational bases around the territory</li></ul>
13d. For your MM project, please provide a brief description below of efforts made to ensure a safe and healthy workplace.
<p>In addition to the above, LCPR has a Health, Safety &amp; Environment (HSE) division, which establishes and monitors compliance with health and safety standards. For this reason, the following trainings has been given to our technical personnel in compliance with OSHA requirements:</p> <ul style="list-style-type: none"><li>• Hazard Communication (HAZCOM)</li><li>• Walking/Working Surfaces</li><li>• Fall Protection</li><li>• Electrical Safety</li><li>• Aerial Lift (Bucket Truck) Certifications</li><li>• Heat Related Illness</li><li>• Defensive Driving</li><li>• Ergonomics</li></ul> <p>Similarly, additional to the above, our main construction contractor (BLDM) has implemented the following efforts to ensure a safe and healthy workplace:</p> <p>1. Safety Training: As mentioned before, BLDM prioritizes safety through comprehensive safety training programs for all personnel involved in the project. Employees receive initial safety orientation upon joining the project and undergo regular training sessions covering topics such as hazard recognition, fall protection, electrical safety, and emergency response procedures. These training sessions are conducted in-house by our certified safety professionals and tailored to address specific job roles and tasks.</p> <p>2. Certifications and Licensure Requirements: To ensure compliance with safety regulations and industry standards, BLDM requires relevant certifications and licensure for all workers engaged in construction activities. This includes certifications such as OSHA 10 (labors) and OSHA 30 (managers and supervisory personnel) for construction, as well as specialized training for tasks such as confined space entry, traffic control, and equipment operation. BLDM offers free training, workers are required to obtain these certifications through provided resources and support.</p> <p>3. Workplace Safety Committees: BLDM has established workplace safety committees comprising representatives from management, labor, and relevant stakeholders. These committees meet regularly to discuss safety issues, identify hazards, and propose solutions to enhance workplace safety. Issues raised by the safety committees are promptly addressed through collaborative efforts, with resolutions implemented to mitigate risks and improve safety conditions on the construction site.</p> <p>Resources Offered for Maintaining a Safe and Healthy Workplace:</p> <ul style="list-style-type: none"><li>• Safety Training: BLDM provides access to comprehensive safety training programs conducted by certified professionals to ensure that workers have the knowledge and skills necessary to work safely on the construction site.</li><li>• Certifications and Licensure: BLDM allocated resources to support management, supervisory, EHS Officers and EHS Management in obtaining required certifications and licensure, including covering the costs of</li></ul>

training courses, exam fees, and study materials. • Workplace Safety Committees: BLDM fosters an environment of collaboration and active participation in safety initiatives, with resources dedicated to supporting workplace safety committees in addressing issues, implementing solutions and promoting a culture of safety among all project stakeholders.
Has the team offered any of the following resources to assist with maintaining a safe and healthy workplace for this reporting period? If so, which resources (please provide a brief description of any of the following that apply): Safety Training Certifications and/or Licensure Requirements for all relevant works (e.g., OSHA 10, OSHA 30, confined space, traffic control, or other training required of workers employed by contractors) Issues raised by workplace safety committees and their resolutions
N/A

Subcontracted Entities Information			
As stated in the MM NOFO, if a recipient has not provided a certification that a project either will use a unionized project workforce or included a project labor agreement, meaning a pre-hire collective bargaining agreement consistent with section 8(f) of the National Labor Relations Act (29 U.S.C. 158 (f)), then the recipient must provide a project workforce continuity plan.			
13e. Please provide the name(s) below of any subcontracted entities performing work on the project, and the total number of workers employed by each entity.			
13e-1. Name of Subcontracted Entity Performing Work	Status	13e-2. Total Number of Workers within this Subcontract	13e-3. Job Categories of Workers Supporting Project within this Subcontract
Ing. Rosario Jiménez (Compliance Resource, Inc.)	Inactive	3	Environmental Management
BLDM - BERMUDEZ, LONGO, DIAZ-MASSO, LLC	Active	78	Under the Construction category, the subcontractor BLDM provides a multidisciplinary workforce that supports the execution of field activities in accordance with the project’s scope, safety protocols, and quality standards.  The team includes personnel with a broad range of technical expertise and operational experience, reflecting diverse roles essential for delivering construction milestones effectively. This labor force also embodies the project's commitment to inclusive workforce development and equitable employment practices.
Enzo Group	Active	3	The subcontractor ENZO GROUP LLC is supporting the project under the category of Project Inspection Fees. ENZO GROUP LLC provides specialized personnel for inspection activities to ensure compliance with project requirements and standards.
Anchor Group	Active	4	Anchor Group supported the project within the Engineering and Design category. Their scope of work included the design of the internal plant and providing technical assistance during the site preparation phase. These contributions were essential to ensure infrastructure readiness and alignment with project requirements prior to construction execution.

NETCOM	Active	8	Netcom supports the construction of the facilities needed for installing equipment and generators for the Middle Mile project.
13f. Please describe below the steps taken to ensure that workers on the project receive wages and benefits sufficient to secure an appropriately skilled workforce in the context of the local and regional labor market.			
<p>To ensure that workers on the Middle Mile project receive wages and benefits sufficient to attract and retain an appropriately skilled workforce within the local and regional labor market, Liberty Communications of Puerto Rico, in coordination with its primary construction contractor BLDM, has taken several key steps:</p> <p>We provide competitive compensation packages that include health coverage (medical, dental, vision, pharmacy), life insurance, 401(k) plans with employer match, and performance-based and holiday bonuses. Paid leave policies also recognize life events, supporting work-life balance.</p> <p>Our contractor conducts annual market analyses and benchmarks compensation against similar regional infrastructure projects to ensure wages remain competitive and aligned with labor market expectations.</p> <p>Wages are determined based on responsibilities, skill levels, taking into account market conditions, in compliance with the Fair Labor Standards Act (FLSA), and other applicable federal and local labor regulations.</p> <p>These efforts help ensure that the project remains adequately staffed with qualified personnel throughout its duration.</p>			

I. ANCHOR INSTITUTIONS	
Please provide Anchor Institution (AI) data for the current period only (not cumulative). Please add rows as needed.	
14a. Anchor Institution Name	These questions were answered via file upload. <b>File Uploaded with Responses:</b> Anchor Institutions.xlsx, Anchor Institutions 2025.xlsx
14b. Street Address	
14c. City	
14d. State	
14e. Type of Anchor Institution	
14f. Interconnection with 1,000 Feet of AI Enabling Gig Symmetrical Service	
14g. Narrative Description of how the Anchor Institution may benefit from the Grant Funded Infrastructure	

J. BROADBAND ACCESS KEY INDICATOR: SUBSCRIBERS AND SPEED

Please use the following table to provide anticipated key indicators with the projected totals for each beneficiary category, access type and speed category for your infrastructure service or project. Except as indicated, information should be reported cumulatively from award inception through the end of the bi-annual period for Bi-Annual Indicators. Please write the number “0” if your project does not include this indicator.

\*\*\* Period 1 ends September 30 and Period 2 ends March 31. Additional columns may be added for a Year 6, Period 1 or 2, Baseline if the Period of Performance is 5 years.

PROJECTED NUMBER OF SUBSCRIBERS AND SPEED	Year 1		Year 2		Year 3		Year 4		Year 5	
ACCESS TYPE	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2
15a. Anchor Institutions (AIs)***										
15a-1. Total Number of AIs passed	0	0	0	41						
15a-2 Number of AIs within 1,000 feet of the middle mile infrastructure	18	18	0	41						
15a-3. Total number of AIs served	9	9	0	0						
15a-4. AIs with new access	0	0	0	0						
15a-5. AIs with improved access	0	0	0	0						
15a-6. Total number of AIs served with speeds of at least 1/1Gbps	0	0	0	0						
15b. Broadband Wholesalers or Last Mile Providers***										
15b-1. Total number of broadband wholesalers or last mile providers served	0	0	0	0						
15b-2 Broadband wholesalers or last mile providers with new access	0	0	0	0						
15b-3. Broadband wholesalers or last mile providers with improved access	0	0	0	0						

15b-4. Total number of broadband wholesalers or last mile providers offering speeds of at least 25/3 Mbps	0	0	0	0						
15b-5. Total number of broadband wholesalers or last mile providers offering speeds of at least 100/20 Mbps	0	0	0	0						
15b-6. Total number of broadband wholesalers or last mile providers offering speeds of at least 1/1 Gbps	0	0	0	0						

K. BROADBAND ACCESS KEY INDICATOR: NETWORK BUILD PROGRESS										
Please use the following table to provide anticipated key indicators and progress of your Infrastructure project. Except as indicated, information should be reported cumulatively from award inception through the end of the bi-annual period. Please write the number “0” if your project does not include this indicator.										
*** Period 1 ends September 30 and Period 2 ends March 31. Additional columns may be added for a Year 6, Period 1 or 2, Baseline if the Period of Performance is 5 years.										
NETWORK BUILD PROGRESS***	Year 1		Year 2		Year 3		Year 4		Year 5	
KEY INDICATOR	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2
16a. Total of new fiber miles (aerial or buried)	0	0	2	35						
16b. Total of fiber miles leased	0	0	0	0						
16c. Total of existing fiber miles upgraded	0	0	0	0						
16d. Total number of new microwave links	0	0	0	0						
16e. Total number of new towers	0	0	0	0						

16f. Total number of new interconnection points	0	0	1	1						
16g. Total number of signed agreements with broadband wholesalers or last mile providers	0	0	0	0						
16h. Total of potential agreements (i.e., agreements currently being negotiated) with broadband wholesalers or last mile providers (This Total should NOT be reported cumulatively)	0	0	0	0						

L. QUANTIFIABLE METRICS										
<b>Quantifiable Metrics</b> - Section designed to assist with <b>reporting</b> and <b>audit</b> purpose to quantify how much progress was made and track the location of where the progress was made.										
*** Period 1 ends September 30 and Period 2 ends March 31. Additional columns may be added for a Year 6, Period 1 or 2, Baseline if the Period of Performance is 5 years.										
17a. Fiber Optic Based ***	Year 1		Year 2		Year 3		Year 4		Year 5	
	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2
17a-1. Is the fiber a buried/aerial or undersea application?	buried/aerial	buried/aerial	Buried	Buried						
17a-2. Number of strands deployed	0	0	864	864						
17a-3. Number of miles of buried fiber deployed	0	0	2	35						
17a-4. Number of miles of aerial fiber deployed	0	0	0	0						
17a-5. Estimated capacity of fiber (i.e. throughput)	0	0	2	0						
17a-6. Deployment cost per mile of buried fiber optics	\$0.00	\$0.00	\$249,075.00	\$287,727.03						
17a-7. Deployment cost per mile of aerial fiber optics	\$0.00	\$0.00	\$0.00	\$0.00						

17a-8. Total Spent on Buried Fiber Deployment this reporting period	\$0.00	\$0.00	\$489,468.00	\$9,536,271.60						
17a-9. Total Spent on Aerial Fiber Deployment this reporting period	\$0.00	\$0.00	\$0.00	\$0.00						
17a-10. Total spent on Fiber Deployment this reporting period	\$0.00	\$0.00	\$489,468.00	\$9,536,271.60						
17a. Fiber Optic Based ***, Long Text Responses and File Uploads										
Current Period (Year 2, Period 2)										
17a-11. Please provide any additional information about the Fiber Optic deployment (200 words or less)										
17a-12. Please provide the digital mappings (e.g., CAD, Revit, KMZ, KML) for the new aerial fiber and buried fiber equipment installed during this reporting period.	File(s) uploaded for digital mappings: NTIA REPORT 20250625.kmz									

17b. Microwave Based ***	Year 1		Year 2		Year 3		Year 4		Year 5	
	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2
17b-1. How many microwave nodes have been deployed?	0	0	0	0						
17b-2. How many microwave nodes are operating for reporting period?	0	0	0	0						
17b-3. Installation cost per microwavable node	\$0.00	\$0.00	\$0.00	\$0.00						
17b-4. Number of new towers built to support microwave structure	0	0	0	0						
17b-5. If applicable, what type of tower was constructed (a) Monopole (b) Self-Support, (c) Guyed, or (d) Other during this reporting period?	N/A	N/A	N/A	N/A						





17c-4. Please provide any additional information about the Satellite deployment (200 words or less)	Satellite deployment is not applicable to this project.
17c-5. Please provide the digital mappings (e.g., CAD, Revit, KMZ, KML) for the satellite network accessed during this reporting period.	

Certifications
18. Please provide certification evidencing compliance with Federal labor and employment laws along with the requirements of Infrastructure Investment and Jobs Act and Middle Mile Grant Program, for the bi-annual period for which this report is being filed.
Liberty certifies its compliance with applicable Federal labor and employment laws for this Middle Mile project for the bi-annual period for which this report is being filed, clarifying however that Liberty is not subject to Davis-Bacon requirements under the Middle Mile Grant Program.
19. Please provide certification evidencing compliance with the Build America, Buy America Act. The Build America, Buy America Act requires that all of the iron, steel, manufactured products (including but not limited to fiber-optic communications facilities), and construction materials used in the project or other eligible activities are produced in the United States unless a waiver is granted.
BABA requirements do not apply to LCPR as it is a for-profit organization and not classified as a 'non-Federal entity' under the Infrastructure Act and OMB guidance.  <b>File Uploaded:</b> Middle Mile Code Detail- MMG Inventory Report - March 2025.xlsx, MMG- Baba Req.pdf

20. I certify to the best of my knowledge and belief that this report is correct and complete for performance of activities for the purposes set forth in the award documents.	
20a. Typed or Printed Name and Title of Authorized Certifying Official:	Jean Rene Santiago Cruz
20b. Signature of Certifying Official:	Jean Rene Santiago Cruz
20c. Telephone (area code, number and extension):	787-657-3050
20d. Email Address:	jean.santiago@libertypr.com
20e. Date:	06/17/2025