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	PENINSULA FIBER NETWORK LLC OMB Control No.		OMB Control No. 0660-0052
		Expiration Date	Exp. Date: 2/28/2027

		Middle Mile Grant Program Bi-Annual Perfo	ormance Report						
A. GENERAL INFORMATION									
1a. Recipient Organization:	PENINSULA FIBEI	R NETWORK LLC	1h. Award Identification Number:	26-40-N	1M196				
1b. Recipient Street Address:	1i. Report Date (MM/DD/YYYY):								
1c. City, State, and Zip Code:	1j. Final Report:	Yes		No	х				
1d. Unique Entity Identification (UEI) Number: H1TJJENJ2M23			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):	03/31/2	025				
1f. Award End Date (MM/DD/YYYY):	06/30/2028								
1g. Name of Person Completing Report:	Tammy Smith								
B. PROJECT NARRATIVE									
Please use the section below to provide a project narrat This section aims to help reviewers better understand w									
2a. A brief description of the recipient's organization a work/project priorities.	nd scope of	members are Baraga Telephone Company (BTC) and Hiaw miles across MI, WI, and MN, and prides itself on service rend users. PFN offers state of the art carrier grade data trans	ued broadband provider created in 2004 as a limited liability company taxed as a partnership whose and Hiawatha Communications Inc. (HCI). PFN has built MM fiber optic network spanning >5,470 fiber ervice reliability, stable high throughput, and a low latency self healing network for our customers' data transport services including optical transmission, next generation IP solutions, high volume Core 911 (NG911) Call Management System Services, tandem switching, and local exchange voice services to						

	433 unique customers. Notably, PFN is the sole source provider of Next Generation 911 (NG911) Call Management System Services to 82 of 83 counties in MI and in Florence County, WI. Peninsula Fiber Network, LLC (PFN) project titled Infrastructure for Michigan's Peninsulas and Critical Crossings (IMPACC) was developed to meet both the State of Michigan and NTIA Middle Mile Grant (MMG) program goals; to connect middle mile infrastructure to last mile networks that provide or plan to provide broadband service to households in unserved areas, to offer wholesale broadband services at reasonable rates on a carrier neutral basis, and to strengthen national security.
2b. An overview of the significant outputs and outcomes to be accomplished in the project.	To accomplish these goals, PFN will construct three routes that traverse Michigan's lakes and unserved counties and towns bringing essential middle mile infrastructure for our state and into rural counties serving over 35,000 homes in need of broadband internet connectivity. Route #1 Byron Center to Chicago 1.1 Undersea Chicago to St Joseph 1.2 Undersea Benton Harbor to Chicago 1.3 Chicago Landfall to Federal & Cermak (terrestrial) 1.4 Byron Center to Benton Harbor/St Joseph (terrestrial) Route #2 Upper Peninsula (UP) to Beaver Island to Charlevoix to Gaylord 2.1 Gulliver to Lake MI (terrestrial) 2.2 Undersea UP Beaver Island Charlevoix 2.3 Charlevoix to Gaylord (terrestrial) Route #3 Port Huron to Flint 3.1 On land from Port Huron to IXC in Flint
2c. How would the project meet the recipient's business and/or administrative need(s)?	Upon completion, this project will establish a continuous loop within PFN's network connecting the Upper Peninsula to the Lower Peninsula and extending to Chicago; creating both redundancy and reliability for those served along this network. The east side route from Port Huron to Flint, when complete, will also connect to PFN's existing network providing redundancy and reliability to a historically impoverished area. All three routes will connect to 123NET's state of the art data center. These benefits along with high count fiber strands and an open access network will provide PFN with the opportunity to monetize each area of the routes while maintaining fair low cost pricing for ISPs.
2d. Provide an overview of key accomplishments achieved for this reporting period on the MM infrastructure project.	R1 = Route 1, Chicago to Benton Harbor/St. Joseph to Byron Center R2 = Route 2, Gulliver to Beaver Island to Charlevoix to Gaylord R3 = Route 3, Flint to Port Huron PFN General Progress 1. Weekly/bi-weekly meetings with FPO, GMS, and Federal EPO. 2. Quarterly Conference Call with FPO, GMS and EPO. 3. Participated in NTIA's Bi-Weekly Office Hours. 4. Weekly progress, monitoring and oversight meetings with 123NET, JSI, GEI, Wopschall Consulting and HBK. 5. Monthly financial review of subrecipient, engineers, and engineering subcontractors' invoices and milestones. 6. Weekly internal team meetings for discussion and decision making. 7. Met quarterly with the State of Michigan's Permitting Team. They provide leadership and support if issues arise at the local agency level. 8. Completed 9 drawdowns (5 PFN and 4 123NET). 9. Held a community engagement event on Beaver Island October 9-11, 2024. Updated key stakeholders on environmental and hydrographic survey progress. Community poster session showcasing various stages of environmental and hydrographic survey activities. 10. Prepared for and engaged in desk review with NTIA 1/13/25. Praise received for level of preparation. No corrective actions report. 11. Conducted a subrecipient monitoring visit with 123NET 2/14/25, using the same tool NTIA used with PFN. Monthly follow-up meetings with 123NET to review progress of action items.

- 12. Routes 1 and 2
- Procured Underwater Cable Specialist, Wopschall Consulting.
- Procured legal team in Chicago for city and park district property use agreements
- CLEC issued by Illinois Commerce Commission (ICC)
- Completed all near shore hydrographic surveys. Data being evaluated for best cable placement and installation method.
- Conducted RFI for Horizontal Directional Drill (HDD) Contractors
- Conducted RFI for Submarine Cable Manufacturer.
- Conducted RFI for Fiber Optic Cable Installation Contractors
- Drone footage captured during hydrographic surveys. Footage turned into a video that has been widely shared with IMPACC project stakeholders.
- Completed project intro meetings with City of Chicago and Chicago Park District

Environmental

- 13. Routes 1 and 2
- USFWS Concurrence received for geotechnical boring
- Facilitated project introduction meetings with MI & IL SHPO, USACE, IL DNR, MI DNR & EGLE
- Discussing with NTIA Environmental Program Officer having 1 programmatic agreement for routes 1 and 2 combined; and 2 environmental assessments, one for each route.
- 14. R3 Submitted Categorical Exclusion to NTIA 12/4/2024.

Site Prep, Land Purchases

- 15. R2 Procured property for 2 hut locations: Charlevoix, Mancelona
- 16. R1 Local business in St. Joseph approves use of property for hut location.

123NET

Network Design

- 17. Route 1
- Staking sheets design completed
- Detailed construction design, 42 plant sets completed, 8 pending completion
- Metro Act permits 9 completed, 3 pending approval
- 18. Route 3
- Staking sheets design completed.
- More detailed construction sheets design completed.
- RR crossing permits submitted and approved.
- METRO Act permits 100% complete

Environmental

19. R1 & R3 Lending support to JSI as needed.

Site Prep, Land Purchases

- 20. Route 1
- Dumont Lake property purchased; special use plan approved by township
- Pullman suitable property found with local township, working to get into purchase agreement.
- Lawrence Multiple sites found, attempting to lock into purchase agreement.
- 21. Route 3
- Flint Preliminary site plan approval by City, property purchased, pending special use plan approval by city
- Lapeer property purchased, special use plan approved by city, pending site plan approval

- Riley Twp original property special use plan was denied by township, working with property owner across the street to come to an agreement to use property.
- Port Huron Twp property purchased; special use plan approved by township with stipulation of pending EGLE approval.

JSI

Network Design

- 22. Routes 1 and 2
- Terrestrial design is functionally complete. Construction details being finalized.
- Field staking is underway, incorporating accommodations and adjustments for cultural and environmental requirements to secure permits.
- Underwater network design is progressing according to plan.
- Permit applications are being prepared to conduct the off-shore geotechnical investigation.
- Geotechnical data will be used to facilitate the horizontal directional drill (HDD) design at each shore landing location.

Environmental

- 23. Route 1
- Terrestrial route field surveys for wetlands, waterways, and threatened/endangered (T&E) suitable habitats have been completed.
- Chicago shore landings: USFWS agrees with a no effect determination for the geotechnical investigation activities.
- Michigan shore landings: USFWS provided concurrence.
- 24. R2 Field survey work along terrestrial route has been completed.
- 25. Routes 1 and 2 (On-Shore Geotech CatEx)
- Tribal notification, desktop study, and sensitivity analysis for the on-shore Geotech sites are also complete.
- Section 106 application is being prepared for on-shore Geotech.
- 26. Routes 1 and 2 (Off-Shore Geotech CatEx)
- Desktop study and sensitivity Analysis for off-shore Geotech are underway.
- Results from the Geotech investigations will inform routing decisions and enable further Section 106 consultation steps to proceed
- 27. Route 3 (Categorical Exclusion)
- Section 7 Consultation with the US Fish and Wildlife Service is complete and a concurrence of "may affect, not likely to adversely affect" for threatened and endangered species has been obtained.
- Desktop study, sensitivity analysis, pedestrian cultural survey and categorical exclusion document are complete. Finding of "no adverse effects."
- Biological field survey work is complete.
- Addressed NTIA's curing questions. Awaiting NTIA final approval.

HBK (Chicago Engineering Firm – Route 1)

General Progress

- 28. Completed project introduction meeting with Chicago Park District
- 29. Provided PFN with freight tunnel agreement template outlining city requirements
- 30. Provided PFN with list of authorized tunnel vendors to begin agreement process
- 31. Started process with PFN's ROW legal team to secure property use rights in City of Chicago and Chicago Parks.

Network Design

- 32. Submitted Information Retrievals (IR) requests to the Office of Underground Coordination
- 33. Prepared and delivered permit package for Geotech survey to Chicago Park District.

Environmental

N/A

	Site Prep, Land Purchases 34. Surveys completed for North and South landing sites in preparation for Geotech survey
2e. Provide any roadblock experienced during this reporting period impacting the expansion of the MM infrastructure project (i.e., supply chain, availability of labor).	PFN referenced the complexity of the environmental and permitting process in the last two reporting periods and it remains a challenge this reporting period. As we design, engineer and begin the environmental and permitting processes for the subsea sections of our project, we determined that Michigan and Illinois use different hydrographic survey standards. Michigan uses BOEM standards, while Illinois uses Wisconsin State Archeological Survey Standards. We are working closely with JSI, GEI, Ryan Wopschall (Undersea Cable Specialist) and both state agencies to determine how to reach a compromise to avoid duplication and excessive surveying for an undersea fiber optic cable deployment.
2f. Provide any barriers to improving job quality experienced during this reporting period.	None

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
	1826	07/01/2023	06/30/2028

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.

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.

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%.

*** 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 "0" in the duration field if your project does not include an activity. If necessary, please insert additional milestones at the end.

ANTICIPATED PROJECT MILESTONES***			Year 1 I	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						

Overall Project	1263	2023-07-01	2026-12-15	0.41%	3.07%	14.66%	22.52%	24.85%	36.85%	98.98%	100%	%	%
Environmental Assessment	310	2023-10-10	2024-08-15	0%	16.3%	100%	%	%	%	%	%	%	%
Network Design	389	2023-09-08	2024-10-01	9.8%	85.4%	100%	%	%	%	%	%	%	%
Rights Of Way	-123	2024-09-01	2024-05-01	0%	0%	6.4%	66.1%	100%	%	%	%	%	%
Construction Permits And Other Approvals	136	2024-09-01	2025-01-15	0%	0%	21.7%	100%	%	%	%	%	%	%
Site Preparation	277	2024-10-01	2025-07-05	0%	0%	0%	28%	100%	%	%	%	%	%
Equipment Procurement	124	2025-07-14	2025-11-15	0%	0%	0%	0%	59.5%	100%	%	%	%	%
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	491	2025-06-01	2026-10-05	0%	0%	0%	0.1%	0.3%	0.6%	100%	%	%	%

Equipment Deployment	39	2026-09-01	2026-10-10	0%	0%	0%	0%	0%	0%	66.7%	100%	%	%
Network Testing	39	2026-10-10	2026-11-18	0%	0%	0%	0%	0%	0%	0%	100%	%	%
Status of Procurement	934	2023-10-10	2026-05-01	0%	2%	22%	44.3%	46.2%	98%	100%	%	%	%
other	1263	2023-07-01	2026-12-15	28.4%	28.4%	28.4%	28.4%	28.4%	28.4%	28.4%	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***		Yea	ar 1	Year 2		Year 3		Year 4		Year 5	
		Period 1	Period 2								
4a. 4b. Actual Milestone Completion (Cumulative) MILESTONE DESCRIPTION											
Overall Project	NEPA Categorical Exclusion for Route 3 submitted to NTIA. Hydrographic surveying for Routes 1 and 2. RFI's for submarine cable manufacturers and installers.	0.5%	1.4%	3.6%	6.7%						

Environmental Assessment	NEPA Categorical Exclusion submitted to NTIA for route 3. Hydrographic surveys for Routes 1 and 2.	0%	7.5%	15%	33%			
Network Design	Route 3 network design complete. Staking sheets for terrestrial portions of for route 2 complete. May require modifications as permitting begins.	5.4%	20%	62.2%	70%			
Rights Of Way	Rights of way for route 3 almost complete.	0%	1%	2%	2.7%			
Construction Permits And Other Approvals	N/A for this period.	0%	0%	0%	0%			
Site Preparation	Hut locations have been secured for route 3 and some are pending purchase.	0%	2%	4%	4%			
Equipment Procurement	Electronics design and assembly, bid & award ISP vendor.	0.5%	0.5%	0.5%	0.5%			
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	Hydrographic surveys and analysis for Routes 1 & 2.	0%	0%	0%	1.4%			
Equipment Deployment	N/A for this period.	0%	0%	0%	0%			
Network Testing	N/A for this period.	0%	0%	0%	0%			
Status of Procurement	N/A for this period.	0%	0%	0%	0%			

	intenance/corrections, as-built documentation invoices paid in full. Project closeout with NTIA/NIST.	40.5%	40.5%	40.5%						
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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
Infrastructure for Michigan Peninsulas and Critical Crossing (IMPACC)	Active	Peninsula Fiber Network, LLC (PFN) and 123NET (Subrecipient) will build the following broadband network infrastructure routes (Program Routes) in support of PFN's Infrastructure for Michigan Peninsulas and Critical Crossings (IMPACC) Program Grant. 1.1 Undersea Chicago to St Joseph 1.2 Undersea Benton Harbor to Chicago 1.3 Chicago Landfall to Federal & Cermak 1.4 Byron Ctr to Benton Harbor/St Joseph 2.1 Gulliver to Lake MI 2.2 Undersea UP Beaver Isl Charlevoix 2.3 Charlevoix to Gaylord 3.1 Port Huron to Flint Subrecipient Construction Responsibilities. Subrecipient will construct Program Routes 1.4 (Byron Center to Benton Harbor/St. Joseph) and 3.1 (Port Huron to Flint). Subrecipient will use best value for the Program and prepare initial designs.	123NET	false	false	false	\$27816422	\$280296.9	\$27536125 .1	1 %

D. INFRASTRUCTURE BUDGET EXECUTION DETAILS

Please provide details below on your total budget and total fund expended to date for each budget element, including detailed disbursements of both matching funds approved and federal funds obligated from project inception through end of this reporting period. Figures should be reported cumulatively from award inception to the end of the applicable reporting period.

6a. Projected Budget Element	6b. Federal Funds	6c. Non-Federal Funds	6d. Total Project Budget	6e. Total Federal Funds Expended to Date	6f. Total Non-Federal Funds Expended to Date	6g. Total Funds Expended	6h. Percent of Federal Funding Expended to Date (Cumulative)
6a. Administrative and legal expenses	\$1,983,618.00	\$850,122.00	\$2,833,740.00	\$847,264.02	\$363,113.29	\$1,210,377.31	43%
6a. Land, structures, rights-of way, appraisals, etc.	\$2,613,149.00	\$1,119,921.00	\$3,733,070.00	\$146,167.61	\$62,643.10	\$208,810.71	6%
6a. Relocation expenses and payments	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Architectural and engineering fees	\$1,819,881.00	\$779,949.00	\$2,599,830.00	\$1,268,377.99	\$543,590.49	\$1,811,968.48	70%
6a. Other architectural and engineering fees	\$448,938.00	\$192,402.00	\$641,340.00	\$1,248,948.33	\$535,263.63	\$1,784,211.96	278%
6a. Project inspection fees	\$1,299,312.00	\$556,848.00	\$1,856,160.00	\$0.00	\$0.00	\$0.00	0%
6a. Site work	\$312,662.00	\$133,998.00	\$446,660.00	\$0.00	\$0.00	\$0.00	0%

6a. Demolition and removal	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Construction	\$42,654,968.73	\$18,280,700.88	\$60,935,669.61	\$579,318.64	\$248,279.41	\$827,598.05	1%
6a. Equipment	\$6,498,513.00	\$2,785,077.00	\$9,283,590.00	\$0.00	\$0.00	\$0.00	0%
6a. Miscellaneous	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Subtotal	\$57,631,041.73	\$24,699,017.88	\$82,330,059.61	\$4,090,076.59	\$1,752,889.92	\$5,842,966.51	7%
6a. Contingencies	\$3,625,664.00	\$1,553,856.00	\$5,179,520.00	\$0.00	\$0.00	\$0.00	0%
6a. Totals	\$61,256,705.73	\$26,252,873.88	\$87,509,579.61	\$4,090,076.59	\$1,752,889.92	\$5,842,966.51	7%

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	
7b. Developer Name: Please provide the name of the Developer.	These questions were answered via file upload. Number of Community Agreements: 1
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.	File(s) Uploaded with Responses: PFN 26-40-MM196 CBA St. Joseph Twp.pdf

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 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

Files Uploaded for Hazard Screening Information: PFN 26-40-MM196 Hazard Screening 8b-e.pdf
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)?
Potential weather and climate hazards for our middle mile project include: extreme temperatures, winter storms, high winds, tornados and flooding. Some of the required studies and then the actual installation activities are planned for the optimal weather conditions, based on historical trends and averages. All these activities can be significantly impacted by extremes of heat, cold, wind, and other conditions affected by what might be considered the more frequent aberrations from the historical averages. Adjustments can and must be made to the expected timeframes and the processes required to study and then to install in the methods with the least impact. The materials to be used are designed for minimal long-term impact on the environment, and minimal impact to from the environment on the cable. Once the optical fiber cable is installed it can be expected to be nearly impervious to any climate changes except the most extreme weather events. PFN's planning process incorporates industry best practices to respond automatically to any impacts immediately once they occur. This planning includes routines for inspection, preventive maintenance, and repairs to all network components including but not limited to hazards related to climate change.
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
PFN's staff and consultants have not experienced any disruptions during this reporting period.
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
8i. Risk Mitigation: How will the project avoid and/or mitigate the risk identified? If not applicable, please explain why.
PFN's risk mitigation plan accounts for extreme temperatures, winter storms, high winds, tornados and flooding using input from permits, environmental assessments, and surveys of the site locations. All PFN network installations follow these mitigation strategies to provide maximum accessibility, reliability and redundancy to ensure our facilities can withstand weather events and keep our clients connected. PFN has equipment, spare parts, technicians and other personnel, at the ready to deploy and reach our facilities in a timely manner should a disruption occur from a weather event. Outages are assessed for damage and replacement parts installed as needed to rapidly restore service to our customers. As a general practice, PFN uses buried techniques to place fiber plant underground minimizing exposure to weather events. Fiber for this project will be constructed using buried techniques and watertight splice cases to

strengthen availability of service. Additionally, PFN's mapping and monitoring system allows us to monitor and anticipate climate related impacts. As new routes and equipment are brought online, they are added to PFN's mapping and monitoring systems.

For this project PFN has designed a network with increased capacity and redundancy for each route to maintain service availability, should isolated parts of the network become compromised. Electronics, cabinets and hut locations:

- PFN uses electronics that are temperature hardened, withstanding fluctuations from -40 degrees Celsius to 65 degrees Celsius.
- Sites with temperature sensitive electronics are temperature controlled by HVAC systems with batter backups capable of running a minimum of 8 hours in the event of a commercial power failure.
- Passive cooling aspects of the cabinets, airflow, shade and 'openness' in the cabinets assist with heat transfer.
- If critical temperatures are reached an alarm would trigger, immediately notify our Network Operations Center and technicians would be dispatched to mitigate the impact to PFN's electronics by deploying fans or portable cooling units.
 - This safety mechanism allows for the quickest return to available service once temperatures return to tolerable levels.
- CO buildings and cabinets have backup power generators onsite in the event of extended power outages.

8j. Additional Information: 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?

Nothing new for this reporting period.

8k. Additional Resources

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

Historical reference to 10-year floodplain maps and insurance data have been analyzed as extreme weather events affect this data and expectations. As this data expands, PFN will continue to adapt operations planning and prepare for a response to any network-impacting events, and/or risks that might be mitigated. The redundancy of the proposed equipment, especially the cable paths, is the first step in preparation. Ongoing adjustments to processes are anticipated. PFN's greatest resource is our hands-on experience constructing and operating communication facilities in this region. This experience allows us to anticipate potential problems and develop a precise plan.

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.

		Number of Hires																	
											Rad	ce/Ethnicit	ty						
Hires by Race,		9b.										Non-Hispa	9c. nic/Non-l	atino					
Ethnicity and Sex	Hisp	oanic or La	ntino			9c M						9c Woi							Totals
	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	0	0		1	0	0	0	0	0	0	0	0	0	0	0				1
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	l	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%				
Number of Local Subcontractors	0	0	1	0	0	1	0	0	1	0	0	0	0	0				3
Number of Non-Local Subcontractors	0	0	0	1	0	0	0	0	1	0	0	0	0	0				2
Percentage of Local Subcontractors on Award	0%	0%	100%	0%	0%	100%	0%	0%	50%	0%	0%	0%	0%	0%				

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? Yes 10b. Please cite your source of how this information was gathered (for 10a). No hiring of laborers has taken place yet for PFN or our subrecipient, 123NET. Our intent is to hire at the Davis Bacon prevailing wage.

10c. Are wage rates at least the prevailing wage for all mechanics?	Yes
10d. Please cite your source of how this information was gathered (for 10c).	No hiring of laborers has taken place yet for PFN or our subrecipient, 123NET. Our intent is to hire at the Davis Bacon prevailing wage.
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.	

Workforce Den	Vorkforce Demographic Data																		
											Number o	f Jobs							
		Race/Ethnicity																	
Jobs by Race,		11-a									No	11b. on-Hispanic/N							
Ethnicity and Sex	Hi	11-a. Hispanic or Latino				11b Me		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				· Totals
Jobs Created	0	0		2	1	0	1	0	0	2	0	0	0	0	0				6

Workforce Demog	graphic D	ata																
Jobs Retained		0	0	0	0	0	0	0	0	0	0	0	0	0				0

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.

PFN does not have union workers nor any collective bargaining agreements in place, and will ensure all subcontractors have a commitment to union neutrality. However, PFN does provide competitive wages, benefits, and training to its employees. PFN subscribes to Salary.com to ensure pay is competitive in State and National markets for each position, and ensures employees are paid fairly. PFN employs both nonexempt hourly and salaried employees, as well as exempt salaried employees. Nonexempt hourly employees prepare timesheets of time worked. The standard workday is 8 am to 5 pm Monday through Friday with a minimum of paid 15-

minute breaks every four hours and an hour unpaid break for lunch. Overtime is paid at time and a half for any time over eight hours in an individual day and for any time exceeding forty hours in a work week. Exempt salaried employees meet all federal standards for this classification and are not eligible for overtime pay. PFN's wage scales and overtime payment practices are well above the minimum level.

PFN will use contractors for engineering, cable, and construction. PFN solicits bids after issuing a request for proposal, holds at least one bidders' conference, evaluates the proposals, and then selects a winning bid. PFN requires that contractors and subcontractors submit certified prevailing wage payroll reports for all projects that are subject to Davis Bacon compliance. PFN does not employ any laborer's directly so prevailing wage is not applicable for our direct employees. All PFN contractors/subcontractors present invoices for progress payments and payment upon final completion. PFN pays all approved contractor/subcontractor invoices within thirty days from receipt.

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

PFN's subrecipient, 123NET integrates various strategies, including the attraction of external talent, implementation of comprehensive training programs, and the retention of skilled individuals. Their structured training program is designed to identify and nurture talent, coupled with mentorship initiatives that enable experienced team members to guide and train junior staff. 123NET places strong emphasis on upskilling existing laborers, preparing them for advanced roles. Their commitment to leadership development is evident in the identification of high-potential individuals within their workforce, providing them with targeted training to prepare for leadership roles. The adoption of a competency-based hiring framework ensures that new recruits possess the necessary qualifications and expertise required for this NTIA MM project. In terms of compensation, 123NET continuously reviews and adjusts packages to remain competitive in the job market, complemented by the implementation of performance-based incentives to reward and retain skilled employees.

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): Professional Certifications

In-House Training

Registered Apprenticeships

Labor-Management Partnerships

Partnerships with entities like unions, community colleges, or community-based groups

No work involving skilled labor workforce occurred during this reporting period.

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.

Clear and transparent communication channels will be established throughout the project, creating an environment where expectations, project timelines, and potential challenges are openly communicated between PFN, 123NET and JSI, and internally within each organization. Additionally, conflict resolution protocols will be implemented to address issues promptly.

For skilled and non-skilled workforce working at 123NET, conflict resolution will be addressed with designated points of contact or mediators facilitating communication and resolution. Fair compensation and benefits packages, subject to regular reviews and adjustments, will contribute to employee contentment and reduce dissatisfaction. Safety and compliance programs will prioritize a secure work environment, significantly diminishing the risk of accidents and injuries that may lead to disputes. Furthermore, investments in training and skill development programs will not only enhance workforce capabilities but also demonstrate a commitment to employee growth, reducing potential discontent. Diversity and inclusion initiatives will be actively promoted to create an inclusive workplace culture, reducing the likelihood of disputes related to discrimination or inequity.

Major disruptions, including but not limited to logistics, labor and supply chain availability, and extreme weather, could impact our proposed timeline. We have planned accordingly but are cognizant of numerous aspects beyond our direct control. Most materials we intend to deploy are available from numerous vendors who are improving availability and lead times. Significant increased demand and availability of labor or materials could impact expected delivery, beyond the 'buffers' proposed in our timelines. The undersea optical fiber cable requires customized design and long lead times for crafting and delivery. If feasible, we plan to order the undersea cable materials a year before they are needed on site. Should there be delays beyond what we have anticipated, we will keep the NTIA informed and work together to adapt as needed.

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.

PFN can verify that our subrecipient, 123NET, and all current and future subcontractors have/will have safety and employment law compliance practices required for participating in a federal grant.

123NET's workforce is not unionized and has professional certifications in OSHA 30, OSHA 10, traffic control, confined space, first aid, trenching shoring and excavation, silica safety, distracted driving, PPE C176 safety, heat and cold stress, and ladder training. 123NET implements full safety programs across all departments which includes in-person and digital safety trainings on 19 different topics. The job titles that are expected to work on this project are: Designers, Project Managers, Permitting Inspectors, Foreman, Team Lead, Operator, Laborer. Although these job titles are not the same as Davis Bacon job titles, different titles may be used for the actual wage determination.

JSI has staff available with experience and expertise needed to work as full-time on-site observers and informally supervise the construction process. They will act as the 'eyes and ears' of PFN to ensure the contractors are complying with all specifications and observe good safety practices and a 'common sense' approach to any unforeseen situations that may arise. In any such instance these observers will bring such issues to the attention of the on-site construction supervisor, JSI project management and PFN to expeditiously resolve in an appropriate manner.

13d. For your MM project, please provide a brief description below of efforts made to ensure a safe and healthy workplace.

In addition to 13c., during actual work implementation steps, the network owner and the contractor's supervisors have the ultimate legal responsibility to implement all safe practices. PFN, 123NET and JSI have a vested interest, in both the short term and the long term, to ensure maximum safety protocols are followed. Some construction steps involve certain risks, but proper procedures implemented with proper supervision and observation can help to minimize such risks.

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

No work involving skilled labor workforce occurred during this reporting period.

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
123NET	Active	4	Not applicable for this period.
JSI is PFN's engineering firm on this project. A contractual agreement between PFN and JSI was fully signed in Y1	Active	3	Project engineers and project manager

Period 2. JSI does not employ laborers or mechanics, but will hire them through a subcontract to perform work on the project.			
GEI is JSI's environmental consultant providing EHP support to PFN and 123NET for all 3 route.	Active	6	Environmental Engineers, Project Manager, Geologist, HDD Design Engineer, Environmental Scientist, Archeologist, Biologist, GIS/AutoCAD Specialists
Seaworks hired by JSI	Active	2	Engineer and Hydrographer
HBK hired by PFN	Active	1	Design, engineering, permitting in Chicago, IL
Wopschall Consulting hired by PFN	Active	1	Submarine cable specialist

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.

Not applicable for this reporting period.

. ANCHOR INSTITUTIONS							
Please provide Anchor Institution (AI) data for the current period only (not cumulative). Please add rows as needed.							
14a. Anchor Institution Name							
14b. Street Address							
14c. City							
14d. State	These questions were answered via file upload. File Uploaded with Responses: PFN 26-40-MM196 Anchor Institutions 14a-g.pdf						
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	Yea	ar 1	Ye	Year 2		Year 3		Year 4		ar 5
ACCESS TYPE	Period 1	Period 2								
15a. Anchor Institutions (Als)***										
15a-1. Total Number of Als passed	0	0	0	0	32	32	63	63	63	63
15a-2 Number of Als within 1,000 feet of the middle mile infrastructure	0	0	0	0	32	32	63	63	63	63
15a-3. Total number of Als served	0	0	0	0	0	0	0	0	0	0
15a-4. Als with new access	0	0	0	0	0	0	0	0	0	0
15a-5. Als with improved access	0	0	0	0	0	0	0	0	0	0
15a-6. Total number of Als served with speeds of at least 1/1Gbps	0	0	0	0	0	0	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	32	0	5	5	5	5
15b-2 Broadband wholesalers or last mile providers with new access	0	0	0	0	32	0	0	0	0	0
15b-3. Broadband wholesalers or last mile providers with improved access	0	0	0	0	0	0	5	5	5	5

15b-4. Total number of broadband wholesalers or last mile providers offering speeds of at least 25/3 Mbps	0	0	0	0	0	0	2	2	2	2
15b-5. Total number of broadband wholesalers or last mile providers offering speeds of at least 100/20 Mbps	0	0	0	0	0	0	5	5	5	5
15b-6. Total number of broadband wholesalers or last mile providers offering speeds of at least 1/1 Gbps	0	0	0	0	0	0	5	5	5	5

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		Yea	Year 2		Year 3		Year 4		ar 5
KEY INDICATOR	Period 1	Period 2								
16a. Total of new fiber miles (aerial or buried)	0	0	0	0	106	106	460	460	460	460
16b. Total of fiber miles leased	0	0	0	0	0	0	0	0	0	0
16c. Total of existing fiber miles upgraded	0	0	0	0	0	0	0	0	0	0
16d. Total number of new microwave links	0	0	0	0	0	0	0	0	0	0
16e. Total number of new towers	0	0	0	0	0	0	0	0	0	0

16f. Total number of new interconnection points	0	0	0	0	2	2	5	5	5	5
16g. Total number of signed agreements with broadband wholesalers or last mile providers	0	0	0	0	0	0	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	0	0	0	0	0	0

L. QUANTIFIABLE METRICS

Quantifiable Metrics - Section designed to assist with **reporting** and **audit** 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 ***	Ye	Year 1		Year 2		ar 3	Year 4		Year 5	
17a. Fiber Optic Based ***	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?	yes	yes	Buried/aerial/ undersea	buried/aerial and undersea						
17a-2. Number of strands deployed	0	0	0	0						
17a-3. Number of miles of buried fiber deployed	0	0	0	0						
17a-4. Number of miles of aerial fiber deployed	0	0	0	0						
17a-5. Estimated capacity of fiber (i.e. throughput)	0	0	0	0						
17a-6. Deployment cost per mile of buried fiber optics	\$0.00	\$0.00	\$0.00	\$0.00						
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	\$0.00	\$0.00					
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	\$0.00	\$0.00					
	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) PFN is currently engaged in environmental assessment process. Deployment has not begun.									

17b. Microwave Based ***	Year 1		Year 2		Year 3		Year 4		Year 5	
17b. Microwave Based ***	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?	Other	Other	N/A	Other						

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.

17b-6. Average cost per tower installed	\$0.00	\$0.00	\$0.00	\$0.00					
17b-7. Total spend on Tower deployment this reporting period	\$0.00	\$0.00	\$0.00	\$0.00					
17b-8. Total spend on microwave deployment this reporting period	\$0.00	\$0.00	\$0.00	\$0.00					
17b. Microwave ***, Long Text Responses and File Uploads									
	(Current Period (Yea	r 2, Period 2)						
17b-9. If you answered "Other" to question 17b-5 or if it is a combination of multiple types, please provide a detailed narrative description detailing what type of tower or what combination of towers is used for the project and the associated costs. (200 words or less).	0								
17b-10. Please provide the digital mappings (e.g., CAD, Revit, KMZ, KML) for the microwave nodes created during this reporting period.									

17c. Satellite ***	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
17c-1. What satellite provider is being used?	0	0	N/A	PFN is not deploying satellite based service.						
17c-2. What is the estimated capacity of the satellite link (i.e. throughput)?	0	0	0	0						
17c-3. What is the associated cost to use this satellite service?	\$0.00	\$0.00	\$0.00	\$0.00						

17c. Satellite ***, Long Text Responses and File Uploads

	Current Period (Year 2, Period 2)
17c-4. Please provide any additional information about the Satellite deployment (200 words or less)	PFN is not deploying satellite based service.
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.

Not applicable for this reporting period.

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.

Not applicable for this reporting period.

File Uploaded: MMG Inventory Report_PFN_26-40-MM196_2025.03.31.xlsx

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:	Tammy Smith		
20b. Signature of Certifying Official:	Tammy Smith		
20c. Telephone (area code, number and extension):	9068691511		
20d. Email Address:	tsmith@pfnllc.net		
20e. Date:	04/29/2025		