

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	HORIZON TELCOM INC	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:		HORIZON TELCOM INC			1h. Award Identification Number:		39-40-MM212		
1b. Recipient Street Address:		68 E MAIN ST			1i. Report Date (MM/DD/YYYY):		12/02/2025		
1c. City, State, and Zip Code:		CHILLICOTHE, Ohio 45601-2503			1j. Final Report:		Yes		No X
1d. Unique Entity Identification (UEI) Number:		HED8ZNWABCJ1			1k. Report Period Start Date (MM/DD/YYYY):		04/01/2025		
1e. Award Start Date (MM/DD/YYYY):		07/01/2023			1l. Report Period End Date (MM/DD/YYYY):		09/30/2025		
1f. Award End Date (MM/DD/YYYY):		06/30/2027							
1g. Name of Person Completing Report:		Dan Meenan							
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.		Horizon Telcom has been providing telecommunications services in Ohio for over 125 years, initially as a Ross-county based telephone company and now as an enterprise and residential broadband provider operating in five states. The company operates in two distinct markets: Enterprise Middle-Mile, delivering world-class, ringed fiber services to healthcare, education, large businesses, and mobile operators across five states, and Residential and Small Business, building and operating fiber-to-the-home (FTTH) networks in Ohio. This project will increase the reach of Horizon's middle-mile network in Appalachian							

	Ohio which will, in turn, increase availability of residential/small business broadband services in the unserved communities adjacent to this new middle mile. The project also will improve the resilience of the region's fiber network by closing rings and will improve the electric grid's resilience as part of make-ready.
2b. An overview of the significant outputs and outcomes to be accomplished in the project.	Horizon’s project will build 239 miles of fiber in Appalachian Ohio, including 2 counties that currently have no open middle (Coshocton and Perry) and 6 others that have only limited routes (Holmes, Muskingum, Athens, Knox, Tuscarawas, and Jefferson). The proposed new fiber will pass within 1,000 feet of 16,257 households, 525 Community Anchor Institutions (57 of which remain unserved), and 2,114 businesses. The project also will install new 400 Gbps Points of Presence (POPs) in 3 counties that currently do not have a POP (Coshocton, Holmes, and Perry) and upgrade 28 more POPs on Horizon’s existing NTIA-funded open middle mile network to 400 Gbps. To improve access to major internet exchanges, the project also will install a connector route from the southwestern edge of Horizon’s rural middle mile network to Cincinnati that will interconnect with ComNet’s portion of the state’s existing open middle mile network.
2c. How would the project meet the recipient’s business and/or administrative need(s)?	This project will make it possible for Horizon and/or ISPs who purchase backhaul from us to serve many communities that currently have no reliable broadband access. The project also will improve the reliability and resilience of our regional middle-mile network by closing rings and opening alternate, redundant paths between network locations. Finally, it will significantly increase network capacity via POP upgrades to 400 Gbps.
2d. Provide an overview of key accomplishments achieved for this reporting period on the MM infrastructure project.	<p>The project continues to move forward. Network engineering is complete, POP upgrades are progressing well, and fiber construction has begun. Make ready is starting to move, though still at a much slower rate than we would prefer. We also face delays when dealing with railroad crossings. Although railroad permits have been processed and approved, flaggers currently are not available. Until the railroads can schedule flagging teams, we are unable to work on those crossings. In the meantime, we are focusing on fiber segments that do not require railroad access.</p> <p>To date, we have built 33.77 miles of fiber, including 3.03 miles underground and 30.74 miles aerial. Most of this fiber is in Muskingum County where a significant number of unserved K-12 institutions are located. An additional 8.5 miles of aerial route segments are ready to build, and 293 individual poles in various locations have been cleared by AEP (out of a total of 4,800). Construction will begin shortly for those 8.5 miles. The 293 individual poles, however, are not yet buildable because they are scattered across multiple route segments. As soon as enough contiguous poles are cleared, our construction crews can begin hanging fiber in those areas. We are cautiously optimistic that more miles will be cleared for construction in the upcoming reporting period, including multiple route segments that already have pole attachments in place from a Horizon project that pre-dates the Shentel acquisition. That project was placed on hold due to budget constraints, but the attachments remain available and appear to line up with our NTIA project route segments. Evaluation of these attachments was just beginning at the close of this reporting period. We provide additional information in the next period.</p> <p>Facility preparation has been completed for 26 POP locations. This includes installation of racks, fuse panels, and grounding, power plant upgrades, placing troughs/cabling, and running power cables. Electronics have been purchased and received for 14 POP locations; electronics for an additional 11 locations have been ordered with expected delivery by end of year. Electronics for the remaining 6 sites are under design review with procurement scheduled in the coming weeks. Electronics deployment is complete for the Athens, Chillicothe, Lancaster, and Logan POPs. Deployment currently is under way for 10 POP locations.</p> <p>Finally, Shentel has successfully executed a community benefit agreement with OME-RESA, a K-12 IT Service Center in our project region, to provide IRUs for their use. This is the first of three such community benefit IRU agreements. Negotiations are underway with the other two recipients: the Southern Ohio Health Care Network (SOHCN) and OARNet.</p>
2e. Provide any roadblock experienced during this reporting period impacting the expansion of the MM infrastructure project (i.e., supply chain, availability of labor).	We are seeing progress with make ready, but not as much as we would like. Thus make ready remains the major roadblock. We also face delays when dealing with railroad crossings. Although railroad permits have been processed and approved, flaggers currently are not available. Until the railroads can schedule flagging teams, we are unable to work on those crossings.
2f. Provide any barriers to improving job quality experienced during this reporting period.	No barriers to report.

Rights Of Way	729	2025-01-01	2026-12-31	0%	0%	25%	50%	75%	100%	100%	100%	100%	100%
Construction Permits And Other Approvals	729	2025-01-01	2026-12-31	0%	0%	0%	25%	50%	75%	100%	100%	100%	100%
Site Preparation	729	2025-01-01	2026-12-31	0%	0%	0%	25%	50%	75%	100%	100%	100%	100%
Equipment Procurement	729	2025-01-01	2026-12-31	0%	0%	0%	25%	50%	75%	100%	100%	100%	100%
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	729	2025-07-01	2027-06-30	0%	0%	0%	0%	30%	50%	70%	100%	100%	100%
Equipment Deployment	729	2025-07-01	2027-06-30	0%	0%	0%	0%	15%	35%	50%	100%	100%	100%
Network Testing	729	2025-07-01	2027-06-30	0%	0%	0%	0%	15%	35%	50%	100%	%	%
Status of Procurement	729	2025-01-01	2026-12-31	0%	0%	0%	0%	15%	35%	50%	100%	100%	100%

ANTICIPATED PROJECT MILESTONES***	Year 6 Baseline	Year 7 Baseline	Year 8 Baseline	Year 9 Baseline	Year 10 Baseline
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[illegible]

Equipment Deployment	729	2025-07-01	2027-06-30	%	%	%	%	%	%	%	%	%	%
Network Testing	729	2025-07-01	2027-06-30	%	%	%	%	%	%	%	%	%	%
Status of Procurement	729	2025-01-01	2026-12-31	%	%	%	%	%	%	%	%	%	%

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.

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	Engineering is complete and construction is under way. 33.77 miles of fiber has been built (3.03 miles buried and 30.74 miles aerial). An additional 8.5 miles has been cleared for construction and will be under way at the start of October. Make ready remains a challenge, as does access at railroad crossings; however, we are cautiously optimistic that construction progress will speed up in the coming periods. POP upgrades continue to move forward with facility prep completed for 26 locations. Electronics have been purchased and received for 14 POP locations; electronics for an additional 11 locations have been ordered with expected delivery by end of year. Electronics for the remaining 6 sites are under design review with procurement scheduled in the coming weeks. Electronics deployment		0%	5%	6%	13%	36%					%

	is complete for the Athens, Chillicothe, Lancaster, and Logan POPs. Deployment currently is under way for 10 POP locations.										
Environmental Assessment	Environmental and Historic Preservation review is completed. As part of our post-EA commitment, Shentel is working with the state historic preservation office (SHPO) to verify that an underground fiber route will not affect any graves in a cemetery that straddles an existing road right of way. We have shifted the proposed conduit route to the side of the road where marked graves are not as close to the right of way and have submitted that route to SHPO for review. We also are working to identify any stream crossings that will require specific mitigation beyond our standard procedures for handling wetlands and stream crossings. We do not anticipate any major issues with this work.	0%	5%	67%	85%	100%					%
Network Design	Network design has been completed.	0%	10%	15%	82%	100%					%
Rights Of Way	We have begun receiving responses to our rights of way requests.	0%	0%	0%	0%	19%					%
Construction Permits And Other Approvals	We have begun to receive approvals back from permitting entities, including utilities and railroads. In some cases pole attachments are coming back piecemeal rather than as buildable segments. We currently have 8.5 miles of route that can be built while an additional 293 individual poles (out of 4,800) are not yet buildable due to not being contiguous. Railroads still are a bottleneck in areas where construction is under way due to flagging crews not being readily available.	0%	0%	0%	0%	19%					%
Site Preparation	Site preparation for the POP upgrades is nearly complete, including installation of racks, fuse panels, and grounding, power plant upgrades, placing troughs/cabling, and running power cables.	0%	0%	0%	0%	91%					%
Equipment Procurement	Electronics have been purchased and received for 14 POP locations; electronics for an additional 11 locations have been ordered with expected delivery by end of year. Electronics for the remaining 6 sites are under design review with procurement scheduled in the coming weeks.	0%	0%	11%	21%	75%					%
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	Construction is under way. 33.77 miles completed so far. 3.03 buried and 30.74 aerial. 8.5 additional miles have been cleared for construction.	0%	0%	0%	0%	14%					%

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. Expenditures to Date	5i. Remaining Grant Balance	5j. % of work complete
							\$	\$	\$	%

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	\$38,515.54	\$18,484.46	\$57,000.00	\$4,152.58	\$1,992.92	\$6,145.50	11%

6a. Land, structures, rights-of way, appraisals, etc.	\$897,971.63	\$5,510,916.37	\$6,408,888.00	\$337,635.35	\$2,072,093.84	\$2,409,729.19	38%
6a. Relocation expenses and payments	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Architectural and engineering fees	\$1,912,073.69	\$917,646.31	\$2,829,720.00	\$1,912,072.93	\$917,647.07	\$2,829,720.00	100%
6a. Other architectural and engineering fees	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Project inspection fees	\$751,044.97	\$360,443.03	\$1,111,488.00	\$203,099.95	\$97,472.26	\$300,572.21	27%
6a. Site work	\$129,736.56	\$62,263.44	\$192,000.00	\$117,592.69	\$56,435.39	\$174,028.08	91%
6a. Demolition and removal	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Construction	\$15,353,449.00	\$8,726,615.00	\$24,080,064.00	\$2,239,168.52	\$1,074,627.65	\$3,313,796.17	15%
6a. Equipment	\$6,957,491.00	\$3,954,509.00	\$10,912,000.00	\$5,509,032.27	\$2,643,909.25	\$8,152,941.52	79%
6a. Miscellaneous	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Subtotal	\$26,040,282.39	\$19,550,877.61	\$45,591,160.00	\$10,322,754.29	\$6,864,178.38	\$17,186,932.67	40%

6a. Contingencies	\$1,500,271.44	\$1,184,385.56	\$2,684,657.00	\$0.00	\$0.00	\$0.00	0%
6a. Totals	\$27,540,553.83	\$20,735,263.17	\$48,275,817.00	\$10,322,754.29	\$6,864,178.38	\$17,186,932.67	37%

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.

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.

These questions were answered via file upload.

Number of Community Agreements: 3

File(s) Uploaded with Responses: Community Benefit Agreement 2025-09-30.xlsx

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
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Files Uploaded for Hazard Screening Information: Climate Resilience 2025-09-30.xlsx

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)?

Riverine Flooding; Strong wind; Tornado; Ice storm

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 weather hazards affected our existing infrastructure or the proposed locations for this grant funded project during the reporting period. Potential weather impacts are monitored as part of our standard break-fix response as outages are reported. We also monitor NOAA severe weather warnings and long term climate predictions.
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.
<p>Horizon continually inspects the over 6,500 route miles of fiber to identify any issues needing proactive remediation. Common items identified for correction include areas that require tree trimming, fallen limbs on fiber cable, rodent damage, lashing wire coming undone, open splice cases, and any other items field personnel report in their survey. Items reported are tracked for resolution before they become service affecting. Any cable needing replacement due to damage is replaced with armored fiber or an equivalent for greater fiber resilience.</p> <p>Horizon also has a large focus on maintaining the facilities and associated equipment which provide services over fiber. With power reliability being a concern in many of these rural areas, a strong battery and generator maintenance plan is in place. This maintenance plan includes annual testing of batteries and replacement as needed to ensure 8+ hours of battery carrying capacity. All facilities are also equipped with generators that are started/run weekly, as well as full load bank tested annually. Both generators and the battery plant are alarmed with multiple sensors to report issues including rectifier failure, generator start failure, power transfer switch fault, and fuel level. In addition, the facilities have dual HVAC capability with a regular annual maintenance cycle along with both interior and exterior cameras to give real-time visibility into any issues or current status.</p>
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?
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

NOAA Fourth National Climate Assessment - Midwest Region
NOAA 2022 NCEI State Climate Summary for Ohio
First Street Foundation's Risk Factor service (to measure expected flood risk at the county level)
FEMA National Risk Index (riverine flooding at census tract level)
Ohio EMA 2019 Mitigation Plan (ema.ohio.gov/mitigation-plan)
NOAA Climate Explorer (climate graphs for days with >3" precipitation through 2055)
NOAA Disaster and Risk Mapping Tool (Time Series for Flooding/Severe Storm/Winter Storm; Risk Mapping for Weather & Climate Risk)

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?)

Yes

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. Wome n		White	Black or African America n	Native Hawaii an or Pacific Islande r	Asian	Native Americ an or Alaska Native	Two or More Races	White	Black or African America n	Native Hawaiia n or Pacific Islander	Asian	Native America n or Alaska Native	Two or More Races							
Number of Local Direct Hires	0	0		0	0	0	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	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%							
Number of Local Subcontract ors	0	0		88	2	0	0	0	0	9	0	0	1	0	0							100
Number of Non-Local Subcontract ors	0	0		17	2	0	5	0	0	7	0	0	2	0	0							33
Percentage of Local Subcontract ors on Award	0%	0%		84%	50%	0%	0%	0%	0%	56%	0%	0%	33%	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?	Yes
10b. Please cite your source of how this information was gathered (for 10a).	All contractors are unionized.
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).	All contractors are unionized.
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 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	
Jobs Retained	0	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?	Yes
12-b. Are workers provided access to union educators/organizers on employer property or during the work day?	Yes
12-c. Does your MM project utilize a project labor agreement?	Yes
12-d. Did workers receive additional information or training about their workplace rights in addition to already required notice postings?	Yes

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.

When implementing a large project, Shentel may utilize contractors and subcontractors to augment its own workforce. To ensure that these partners also have a highly skilled workforce, Shentel’s contractors typically are unionized and are expected to maintain appropriate certifications and licensure for their technical and construction teams.

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

To encourage our staff to maintain their skills in an ever-evolving industry, all regular employees who (a) have completed their initial six-month introductory period and (b) worked an average of thirty hours or more per week over the previous six-month period are eligible to participate in our Education Assistance program. Employees are eligible to receive up to 100% reimbursement for job-related academic pursuit. Such continuing education opportunities improve commitment to Shentel and help individuals to prepare personally for optimal functioning in a present position. It also helps employees with advancement opportunities to positions in which they could make an even greater contribution to the achievement of corporate goals.

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

Shentel has been instrumental in developing two statewide initiatives in partnership with the Governor’s Office for Workforce Transformation: a Certified Fiber-Optics Splicer training program and a Certified Fiber-Optics Technician training program. Both programs offer 12-week, instructor-led courses with certification requirements and final examinations to demonstrate competency. The splicer program is focused on the skill set required to be a competent fiber splicer and the potential career options from that track. The C-FOT program is focused on broadband installation activities, including not only the technical capabilities to perform an installation at customer premises but also the customer service skills required in roles like this. Both of these initiatives are qualified to use TechCred and IMAP state dollars to subsidize or fully support training for candidates at little or no cost.

Shentel also has established a partnership with Pickaway-Ross Career & Technology Center (PRCTC) to develop a permanent Internship Program. We have provided a letter of intent to hire PRCTC students from the Cybersecurity and Networking class in our Network Operations Center (NOC), and our Customer/Technical Support, Engineering, and Information Technology Departments. We also meet on a quarterly basis with PRTC Job Placement Coordinator Kim Graves and PRTC Administrative Staff to discuss placement progress. In 2022, we hired 6 graduates from the Cybersecurity and Networking Class, and one PRTC student completed a summer internship with our IT Department. That student has now returned to PRTC to complete their senior year.

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.
Shentel maintains open communication between management and rank-and-file employees to identify and address any workplace issues before they rise to the level of a dispute or disruption. All of the subcontractors on this project are unionized. Shentel management values good relations with its subcontractors and their union representatives. As such we encourage open communication between management and the union.
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>Shentel is dedicated to providing its employees with safe and healthful working environments as well as equipment, materials, and training required for safe completion of assigned tasks. The same commitment is required of all Shentel contractors, subcontractors, and material suppliers.</p> <p>OSHA regulations require that precautions be observed to avoid cave-ins when digging boring pits and trenches, especially under wet soil conditions. This is a matter of law and safety. All contractors are required to abide by applicable regulations of the OSHA Act of 1970 and any subsequent revisions. Each contractor must provide employees with all safety equipment required by OSHA, Shentel, and the various governing agencies. Questions regarding compliance with the various regulating agencies will be the responsibility of the Safety Director of each contact company. Safety rules cannot be inclusive. Workers must refrain from unsafe and improper practices including both the violation of written rules and of unwritten rules of “common sense.”</p> <p>The Shentel Outside Plant Manual includes detailed regulations for the use of personal protective equipment, job site "hygeine" to minimize the risk of injury, and specifically addresses manholes and confined spaces in their own section.</p>
13d. For your MM project, please provide a brief description below of efforts made to ensure a safe and healthy workplace.
<p>Shentel is safety focused. Below are excerpts from our Outside Plant Manual that address workplace safety and health:</p> <p>2.2 GENERAL SAFETY REQUIREMENTS</p> <p>1.Zero Tolerance. Workers will not be under the influence of intoxicants, drugs,or any substance, which may impair sense of alertness.</p> <p>2.Scuffling, horseplay, practical jokes, and all conduct of a similar nature are prohibited.</p> <p>3.Indecent or abusive language is prohibited.</p> <p>4.Alertness while fielding or working is of the utmost importance in the prevention of accidents. Personnel must always use caution while moving in and out of traffic, either on foot or in vehicles.</p> <p>5.Good housekeeping is of the utmost importance in the prevention of accidents and fires. Workers must keep their work area and vehicles in a neat and orderly condition. Clean up will be conducted on a daily basis.</p> <p>6.Leaving waste or garbage in and around work areas is prohibited. Each contractor will provide refuse containers at the work site, which will be dumped on a daily basis.</p> <p>7.Established access routes in and about the property will be used.</p> <p>8.Objects that constitute a slipping or tripping hazards will not be left in walking areas.</p> <p>9.Workers will not wear or use anything, which impairs vision or hearing.Personal radios and headphones are prohibited.</p> <p>10.All power line wires will be considered dangerous and of high voltage, unless informed to the contrary by proper authority.</p> <p>11.If equipment is left with the engine running, it must be in neutral gear with brakes set; and if equipped with blade, pan, or bucket, all equipment must be lowered to the ground.</p> <p>12.All machinery and equipment left on an unattended right-of-way must be left inoperable and secured against movement.</p> <p>13.Workers will not create and leave any condition at the work site that would interfere with water drainage.</p> <p>14.Safeguards and safety signs will be kept in place and in good condition.</p> <p>15.Hard hats and safety shoes/steel toed boots are required upon entering any Horizon work site. Tennis shoes are not permitted. Other appropriate safety equipment (glasses, goggles, gloves, face shields) must be worn when regulations apply.</p> <p>16.Prior to starting work, each crew will have a list of emergency numbers(ambulance, police, etc.) on site to contact when necessary.</p> <p>17.Each crew will possess and maintain an OSHA approved first-aid kit (36 unit minimum) with mandatory snakebite kit.</p> <p>2.3 PERSONAL PROTECTIVE EQUIPMENT</p> <p>1.Long pants, shirts, and appropriate footwear will be worn at all times.Shorts, cutoff shirts, and tennis shoes are not permitted. Reflective vests will be worn for all activities in the vicinity of traffic.</p> <p>2.Safety glasses and goggles will be required for each employee.</p>

<p>3. Employees wearing prescription glasses must wear goggles, unless the prescription glasses are ANSI or OSHA-approved safety glasses.</p> <p>4. Hard hats and reflective vests will be worn at all times once an employee enters the site. All hard hats will have the name of the employee’s company on the front of the hat. The employee’s name will appear on the back of the hat. Each company will provide hardhats of a uniform color, for security reasons, to each employee. Foremen and Management personnel will wear white hats with the word “Foreman” appearing on the hard hat.</p> <p>5. Employees will wear safety gloves when needed.</p> <p>6. Disposable respirators will be available to and worn by employees whenever conditions (dust storms, pungent odors) exist that warrant their use.</p> <p>7. While working over water, each employee will be provided with and will wear an approved life jacket.</p> <p>8. Employees will be provided with and wear hearing protection where the average noise level exceeds 90 decibels (dB) for an 8-hour period. Persons working with air tools, compressors, or the like enter this category.</p> <p>9. The contractor shall ensure drinking water is provided for their employees.</p>
<p>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):</p> <p>Safety Training</p> <p>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)</p> <p>Issues raised by workplace safety committees and their resolutions</p>
<p>Per the Shentel Outside Plant manual, all personnel working on-site will be certified as having completed a course in safety training.</p> <p>The latest editions of the following codes and regulations define the minimum safety and construction standards required by Shentel:</p> <p>National Electrical Safety Code (NESC)</p> <p>National Electrical Manufacturer’s Association (NEMA)</p> <p>Code of Federal Regulations, Title 29, Occupational Safety and Health Standards (OSHA)</p> <p>National Electrical Code (NPFA No. 70)</p> <p>Underwriters Laboratories, Inc.</p> <p>Lightning Protection Code (ANSI-5.1)</p> <p>Applicable Local, State, and County Ordinances</p> <p>Applicable Safety Codes Required from Right-Of Way Vendors (e.g. Highway, DOT, Railroad, etc.)</p> <p>RBOC and other operating companies Regulations and Requirements</p> <p>All protection equipment will satisfy the appropriate OSHA, ANSI, and/or State Safety standards.</p>

Subcontracted Entities Information
<p>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.</p>
<p>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.</p>

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
Reid Consulting Group	Active	3	Grant application; Grant compliance and reporting; GIS mapping; industry analysis; technical assistance
Mannik Smith Group	Active	13	Environmental assessment; Cultural and Historic Preservation assessment
Team Fishel	Active	9	Network engineering and design
NB+C	Active	18	Network engineering and design
Aquila Technology	Active	11	Network engineering and design
Thayer Power & Communication	Active	75	Fiber construction and splicing
Lux & Lumen	Active	4	Fiber construction and splicing
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.			
All contractors are unionized and thus pay at least the prevailing wage.			

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. File Uploaded with Responses: Anchor Institutions 2025-09-30.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.										
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	0	0					
15a-2 Number of AIs within 1,000 feet of the middle mile infrastructure	0	0	0	0	0					
15a-3. Total number of AIs served	0	0	0	0	0					
15a-4. AIs with new access	0	0	0	0	0					
15a-5. AIs with improved access	0	0	0	0	0					
15a-6. Total number of AIs served with speeds of at least 1/1Gbps	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	0					%

15b-2 Broadband wholesalers or last mile providers with new access	0	0	0	0	0					%
15b-3. Broadband wholesalers or last mile providers with improved access	0	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	0					%
15b-5. Total number of broadband wholesalers or last mile providers offering speeds of at least 100/20 Mbps	0	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	0					%

PROJECTED NUMBER OF SUBSCRIBERS AND SPEED	Year 6		Year 7		Year 8		Year 9		Year 10	
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										
15a-2 Number of AIs within 1,000 feet of the middle mile infrastructure										
15a-3. Total number of AIs served										
15a-4. AIs with new access										
15a-5. AIs with improved access										
15a-6. Total number of AIs served with speeds of at least 1/1Gbps										
15b. Broadband Wholesalers or Last Mile Providers***										

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

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.										
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	0	0	34					
16b. Total of fiber miles leased	0	0	0	0	0					
16c. Total of existing fiber miles upgraded	0	0	0	0	0					

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

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.										
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	NA	Buried/Aerial	Buried/aerial					
17a-2. Number of strands deployed	0	0	0	0	288					
17a-3. Number of miles of buried fiber deployed	0	0	0	0	3					
17a-4. Number of miles of aerial fiber deployed	0	0	0	0	31					
17a-5. Estimated capacity of fiber (i.e. throughput)	0	0	0	0	57600					
17a-6. Deployment cost per mile of buried fiber optics	\$0.00	\$0.00	\$0.00	\$0.00	\$195,600.00					

17a-10. Total spent on Fiber Deployment this reporting period										
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17a. Fiber Optic Based ***, Long Text Responses and File Uploads										
Current Period (Year 3, Period 1)										
17a-11. Please provide any additional information about the Fiber Optic deployment (200 words or less)	Cost calculations for fiber include materials, labor, and make-ready. It should be noted that total make ready costs may lag behind other construction figures. This can happen when AEP (the main electric utility in the project footprint) issues a "true-up" invoice after make ready is complete that includes additional costs not present in the original make-ready invoice. In some cases these true-up invoices can arrive as much as 6 months after completion.									
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 - OME RESA.zip									

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	0					
17b-2. How many microwave nodes are operating for reporting period?	0	0	0	0	0					
17b-3. Installation cost per microwavable node	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00					
17b-4. Number of new towers built to support microwave structure	0	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	N/A					
17b-6. Average cost per tower installed	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00					

17c-5. Please provide the digital mappings (e.g., CAD, Revit, KMZ, KML) for the satellite network accessed during this reporting period.	
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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.	
Shentel certifies that we and our contractors are compliant with Federal labor and employment laws as well as the IIJA, and the MMG program requirements for this 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.	
MMG inventory report is attached below. As a non-Federal entity, Shentel is exempt from BABA; however, we still make an effort to source materials from the USA whenever possible.	
File Uploaded: MMG Inventory Report_Horizon - 2025_10_30.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:	Dan Meenan
20b. Signature of Certifying Official:	Dan Meenan
20c. Telephone (area code, number and extension):	434 760-7602
20d. Email Address:	dan.meenan@emp.shentel.com
20e. Date:	12/02/2025