

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	PIMA COUNTY	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:		PIMA COUNTY		1h. Award Identification Number:		04-40-MM588			
1b. Recipient Street Address:		115 N CHURCH AVE		1i. Report Date (MM/DD/YYYY):		12/15/2025			
1c. City, State, and Zip Code:		TUCSON, Arizona 85701-1316		1j. Final Report:		Yes		No	X
1d. Unique Entity Identification (UEI) Number:		JBMBVGUK5LF1		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):		06/30/2028							
1g. Name of Person Completing Report:		Michelle Simon							
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.		Pima County, the second largest county in Arizona, proposes to construct a 134-mile open access fiber optic network. This ring is intended to bring resources to smaller communities within the County while expanding resources to all municipalities in the County. FCC data indicates that nearly 10% of Pima County households have no broadband access and no internet, with other communities reporting nearly 18% have no access at all. Given the lack of middle mile infrastructure in the County, many last mile providers have been discouraged from building out due to the cost and a diverse geography, which includes very							

	rural communities. The goal of this grant is to build out the middle mile infrastructure to incentivize last mile providers to build out the connections to be able to build out high-speed, reliable and affordable broadband service to un/underserved County residents.
2b. An overview of the significant outputs and outcomes to be accomplished in the project.	The major output from this grant will be the construction/installation of a 134-mile contiguous open access fiber network ring, containing two micro-ducts with 7-channel conduit. One 432 strand micro-fiber will be run in each micro-duct, allowing the remaining conduit to be available for lease, share, or swap from providers and other government entities. The network is designed in a ring surrounding the outer area of greater Tucson and surrounding rural communities. The major outcome is a structure, means and incentive for last-mile providers to utilize this new "midsection" to build out their networks to provide affordable, reliable high speed broadband service by overcoming challenges of the existing infrastructure (or lack thereof) and ensuring the benefits of the project are felt in more rural and underserved portions of the County.
2c. How would the project meet the recipient's business and/or administrative need(s)?	One of the pillars of Pima County's economic development plan is the need for infrastructure investment. Infrastructure is defined broadly but includes investment in broadband and other technological capabilities. Infrastructure investment, including investment to enable widespread reliable, affordable and reliable broadband, is costly and complex to install, but vital to the County's economic development goals and regional competitiveness. The County also experienced first-hand the costs of not having access to reliable, high-speed, affordable broadband as residents forewent schooling and business opportunities, couldn't access telehealth options, and generally grew disconnected from the world outside their homes. This had a dramatic impact not just on those individuals who lacked broadband resources but on the economic health of the County as a whole.
2d. Provide an overview of key accomplishments achieved for this reporting period on the MM infrastructure project.	Environmental assessment with details for all resource areas, with the exception of cultural and historical, have been submitted for review and approval by NTIA. The Draft Programmatic Agreement has been approved by NTIA and the State Historic Preservation Office. A meeting with all entities who have identified they would like to participate in the PA was held, and edits were made to the document. Additional edits regarding phased construction as it relates to the HPTP were updated pending final receipt of the cultural sensitivity assessment. Additional over the shoulder review of the project design held with Town of Marana and City of Tucson for the first phases of the project. Meetings and permits were submitted to the Arizona Department of Transportation for eight areas along the route. Additional information was provided to BLM and NPS about the project for the development of cost recovery for each entity. Permits for geotech/geomorph borings were submitted and approved by NPS. Borings were completed in September. Met with engineers for BOR to review project requirements and information in the SF299. Permit information submitted to Union Pacific Railroad for crossings, and additional meetings held with Town of Marana regarding the crossing in their jurisdiction. Met with Arizona State Land department to determine permit requirements and how they handled easements within municipalities. Meeting set with local municipalities with ASLD lands.
2e. Provide any roadblock experienced during this reporting period impacting the expansion of the MM infrastructure project (i.e., supply chain, availability of labor).	The environmental assessment for our region is extremely complex. Our project is in an area with many known cultural and environmental resources. Coordination of NHPA, NEPA, and compliance requirements from US Fish and Wildlife Service is difficult and time-consuming. The cultural inventory identified almost 100 additional sites of mid - to high-sensitivity within the APE.
2f. Provide any barriers to improving job quality experienced during this reporting period.	No barriers were encountered during this reporting period.

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										
<p>Please provide the start and end dates for each milestone category of your project. The duration is be based on the start and end dates of each category.</p> <p>Please use the table provided to indicate your EXPECTED percentage of completion on a bi-annual basis for each year of your project. Year 1 begins with your award start date.</p> <p>The percentage of completion should be based primarily on the expenditure of your project budget and should be reported cumulatively from award inception through the end of each semi-annual reporting period. For example, if you expect to complete a particular milestone within the first three periods of your project, the third period and all subsequent periods should state 100%.</p> <p>*** Period 1 ends September 30 and Period 2 ends March 31.</p> <p>Please write “0” in the duration field if your project does not include an activity. If necessary, please insert additional milestones at the end.</p>													
ANTICIPATED PROJECT MILESTONES***				Year 1 Baseline		Year 2 Baseline		Year 3 Baseline		Year 4 Baseline		Year 5 Baseline	
3c. MILESTONE CATEGORIES	3d. DURATION (Days)	3e. START DATE	3f. END DATE	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2
Overall Project	1826	2023-07-01	2028-06-30	2%	10%	25%	40%	50%	60%	70%	80%	90%	100%
Environmental Assessment	463	2023-10-01	2025-01-06	2%	35%	70%	100%	%	%	%	%	%	%
Network Design	727	2023-10-24	2025-10-20	50%	60%	75%	90%	100%	%	%	%	%	%
Rights Of Way	749	2023-08-14	2025-09-01	5%	20%	50%	80%	100%	%	%	%	%	%
Construction Permits And Other Approvals	727	2023-10-24	2025-10-20	0%	10%	40%	75%	100%	%	%	%	%	%

Site Preparation	846	2025-03-06	2027-06-30	0%	0%	0%	5%	30%	55%	80%	100%	%	%
Equipment Procurement	1641	2024-01-02	2028-06-30	0%	1%	10%	30%	40%	50%	70%	100%	%	%
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	1270	2025-01-07	2028-06-30	0%	0%	0%	10%	25%	50%	75%	80%	90%	100%
Equipment Deployment	846	2025-03-06	2027-06-30	0%	0%	0%	5%	30%	55%	80%	100%	%	%
Network Testing	1095	2025-07-01	2028-06-30	0%	0%	0%	0%	17%	34%	51%	68%	85%	100%
Status of Procurement	1826	2023-07-01	2028-06-30	2%	10%	25%	40%	50%	60%	70%	80%	90%	100%
Other				%	%	%	%	%	%	%	%	%	%

ANTICIPATED PROJECT MILESTONES***				Year 6 Baseline		Year 7 Baseline		Year 8 Baseline		Year 9 Baseline		Year 10 Baseline	
3c. MILESTONE CATEGORIES	3d. DURATION (Days)	3e. START DATE	3f. END DATE	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2

[illegible]

Equipment Deployment	846	2025-03-06	2027-06-30	%	%	%	%	%	%	%	%	%	%
Network Testing	1095	2025-07-01	2028-06-30	%	%	%	%	%	%	%	%	%	%
Status of Procurement	1826	2023-07-01	2028-06-30	%	%	%	%	%	%	%	%	%	%
Other				%	%	%	%	%	%	%	%	%	%

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	Finalized the ROW, cultural consultant has completed the pedestrian inventory for 100 of the approximate 140 miles along the project route to inform the NHPA process and identify the area of potential effect. Continued engagement of tribal, state, and federal entities (31 total) in the development of a programmatic agreement for NHPA activities, permitting/licensing with State Historical Museum and State		2%	6%	13%	13%	13%					%

	Library, Archives, and Public Records, coordination with the State Historic Preservation Office. Completed all chapters of the environmental assessment, with the exception of the cultural and historic resources, submitted to NTIA for review and approval. SF299s have been completed for the Bureaus of Reclamation, Bureau of Land Management, and National Parks Service. NPS approved permits for geotech/geomorph borings. Engaged Arizona Department of Transportation, Arizona State Land Department, and the Union Pacific Railroad for permitting and guidance prior to construction. The project milestones have not been met because this project has significant complexities delaying the completion of the EHP. We requested an extension of the EHP until December 31, 2025, for this process.										
Environmental Assessment	Categorical exclusions for geotech/geomorphology investigations and preliminary initial site assessment approved by NTIA. Biological evaluation completed and approved by NTIA. Submission 2 of complete EA was submitted to NTIA for review approval in September. The project milestones have not been met as the EHP because this project has significant complexities. We requested an extension of the EHP until December 31, 2025, for this process.	2%	23%	47%	47%	61%					%
Network Design	Conceptual design created with grant proposal. Design/build contractor has incorporated the feedback from the work on the environmental assessment and cultural resource inventory. Adjustments to number and location of handholes has been incorporated into design. GMPs have been submitted to County Procurement for review and approval. The project milestones have not been met as the EHP for this project has significant complexities. We requested an extension of the EHP until December 31, 2025, for this process.	50%	50%	50%	50%	60%					%
Rights Of Way	ROW contractor has completed work deliverables for the project. The design/build contractor and cultural resources consultant used the information to identify the area of potential effect and make any necessary design adjustments. Discrepancies in ROW information were addressed, and the route was finalized. All entities with ROW ownership have been engaged as part of the project effort. The project milestones have not been met as the EHP for this project has significant complexities. We requested an extension of the EHP until December 31, 2025, for this process.	0%	2%	68%	68%	79%					%
Construction Permits And Other Approvals	Construction permits will not be required until the design phase is complete. SF299s and plan of development have been submitted to Bureau of Land Management, National Parks Service, and Bureau of Reclamation. Permit submissions for Central Arizona Project, Arizona Department of Transportation, Arizona State Land Department, and Union Pacific Railroad have been completed. The project milestones have not been met as the EHP for this project has significant complexities. We requested an extension of the EHP until December 31, 2025, for this process.	0%	0%	0%	0%	5%					%
Site Preparation	Construction site preparation will not be required until the design phase is complete. The project milestones have not been met as the EHP for this project has significant complexities. We requested an extension of the EHP until December 31, 2025, for this process.	0%	0%	0%	0%	0%					%

[illegible]

Equipment Procurement	Pima County will not procure equipment. The design/build contractor is responsible for this portion of the project. Construction will not begin until the EHP is completed. The project milestones have not been met as the EHP for this project has significant complexities. We requested an extension of the EHP until December 31, 2025, for this process.										%
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	Construction will not begin until the EHP is completed. The project milestones have not been met as the EHP for this project has significant complexities. We requested an extension of the EHP until December 31, 2025, for this process.										%
Equipment Deployment	Construction will not begin until the EHP is completed. The project milestones have not been met as the EHP for this project has significant complexities. We requested an extension of the EHP until December 31, 2025, for this process.										%
Network Testing	Construction will not begin until the EHP is completed. The project milestones have not been met as the EHP for this project has significant complexities. We requested an extension of the EHP until December 31, 2025, for this process.										%
Status of Procurement	ima County has procured the services of subject matter experts for ROW (last reporting period), cultural resource inventory/mitigation/monitoring (last reporting period), and environmental assessment/design/build (last reporting period). Current GMPs for network parts and supplies is under review. The project milestones have not been met as the EHP for this project has significant complexities. We requested an extension of the EHP until December 31, 2025, for this process.										%
Other	Not applicable.										%

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.

6a. Architectural and engineering fees	\$2,177,746.00	\$2,003,697.00	\$4,181,443.00	\$1,603,008.87	\$453,085.30	\$2,056,094.17	74%
6a. Other architectural and engineering fees	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Project inspection fees	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Site work	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Demolition and removal	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Construction	\$26,946,684.00	\$8,509,479.00	\$35,456,163.00	\$0.00	\$0.00	\$0.00	0%
6a. Equipment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Miscellaneous	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Subtotal	\$29,374,430.00	\$12,721,553.00	\$42,095,983.00	\$1,603,008.87	\$1,214,283.09	\$2,817,291.96	5%
6a. Contingencies	\$906,847.00	\$281,124.00	\$1,187,971.00	\$0.00	\$0.00	\$0.00	0%
6a. Totals	\$30,281,277.00	\$13,002,677.00	\$43,283,954.00	\$1,603,008.87	\$1,214,283.09	\$2,817,291.96	5%

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: 0
File(s) Uploaded with Responses:

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.

<div>Yes</div> <div>10/22/2025</div> <div>Files Uploaded for Related Documentation: Community Report - Pima County, Arizona _ National Risk Index.pdf</div>			
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
<div>Files Uploaded for Hazard Screening Information: Climate Resilience_102025.xlsx</div>			
<div>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)?</div>			
<div>Based on the FEMA National Risk Index, Pima County has the following potential risks: drought (relatively high); earthquake (relative moderate); heat wave (relatively high); landslide (relatively moderate); lightning (very high); riverine flooding (relatively high); wildfire (relatively high); winter weather (relatively moderate).</div>			
<div>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).</div>			
<div>No</div> <div>The middle mile network is still undergoing environmental and cultural review and assessment and is not impacted by weather and climate-caused issues. During the period, however, Pima County experienced a long heat wave, with heat an ongoing threat to the community, including community assets. The impacts include physical health and the potential for increased demand on the grid, which could impact reliability and resilience. The County passed a heat ordinance to help protect outdoor works, which went into effect in September 2024. The Health Department routinely conducts public awareness campaigns to highlight heat issues and to help mitigate heat-related illness. Much of the County's grid is underground, which reduces vulnerability during summer months, minimizing impacts from heat (and from monsoon-related storms/lightning.)</div>			
<div>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?</div>			

No

8i. Risk Mitigation: How will the project avoid and/or mitigate the risk identified? If not applicable, please explain why.

No new risks were identified during the reporting period that required mitigation.

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?

None

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

FEMA National Risk Index

G. Workforce

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

Davis-Bacon Certification																						
9a. Does the recipient have access to the information requested (all laborers and mechanics employed by contractors and subcontractors in the performance of such project are paid wages at rates not less than those prevailing?)																No						
Local Hire Prioritization and Impact																						
Local hiring is a goal or requirement to hire people who live close to the place of work. This aim is often more specifically structured as a requirement for contractors awarded certain types of publicly funded projects to recruit a certain proportion of the people working on the project from a particular area. Please provide all direct hires and contractors supporting the MM Infrastructure project.																						
Please use the table below to describe how the project prioritizes local hiring.																						
Hires by Race, Ethnicity and Sex	Number of Hires																					
	Race/Ethnicity																					
	9b. Hispanic or Latino			9c. Non-Hispanic/Non-Latino																		Totals
				9c-1. Men						9c-2. Women												
	9b-1. Men	9b-2. Women		White	Black or African American	Native 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							
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	2	0		3	0	0	0	0	0	2	2	0	0	0	0						9	
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	18	9		29	1	1	3	1	0	12	0	0	0	0	0							74
Number of Non-Local Subcontract ors	0	0		0	0	0	0	0	0	0	0	0	0	0	0							0
Percentage of Local Subcontract ors on Award	100%	100%		100%	100%	100%	100%	100%	0%	100%	0%	0%	0%	0%	0%							

Davis-Bacon Act Wages	
Please confirm if wages are at least prevailing*	
*As stated in the MM NOFO as determined by the U.S. Secretary Labor in accordance with subchapter IV of chapter 31 of title 40, United States Code (commonly known as the "Davis-Bacon Act"), for the corresponding classes of laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the State (or the District of Columbia) in which the work is to be performed.	
10a. Are wage rates at least the Davis-Bacon prevailing wage for all laborers?	No
10b. Please cite your source of how this information was gathered (for 10a).	Not applicable. Pima County did not hire or contract construction work during the performance period.
10c. Are wage rates at least the prevailing wage for all mechanics?	No

10d. Please cite your source of how this information was gathered (for 10c).	Not applicable. Pima County did not hire or contract construction work during the performance period.
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		2	0	0	0	0	0	1	0	0	0	0	0						3	

Workforce Demographic Data																					
Jobs Retained	22	12		47	2	1	3	1	0	23	2	0	1	0	0						114

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.
The entity within Pima County that helps ensure the project has appropriately skilled labor force is the County's Community and Workforce Development Department (CWD). Its mission is to connect local individuals, families, neighborhoods and community-based organizations to a network of resources, supports and services essential not just for working, but for learning, living and thriving in Pima County. For workers, CWD offers different tiers of services. At the lowest level, CWD provides employment resources (such as, without limitation, job banks, job matching, workshops, resumes and career counseling). CWD also offers intensive career

services, which includes vocational assessments, individualized career planning, pre-vocational adult education, job search and placement. These services are provided based on eligibility for a variety of grants targeting out-of-school youth and low-income adults, dislocated workers, veterans, and homeless job seekers. CWD also offers an array of training to obtain employment, for those who meet eligibility and other requirements. These programs are provided by a menu of more than 300 qualified occupational training providers and through on-the-job training contracts (including apprenticeships). These trainers include both traditional public and private college partners (including community college) plus grassroots non-profits. Assessments are used to determine appropriate training, and assistance is provided in developing training plans to reach career and employment objectives--for both the worker and the employer. One example is Pima County's H-1B One Workforce program, which provides unserved and underserved residents with testing, on-the-job training, apprenticeships, and supportive services to prepare citizens for occupations in aerospace, advanced manufacturing and information technology fields. One of the current training micro-paths that Pima County shares with Pima Community College is in the construction sector, to ensure that the County has a skilled workforce to help entrench the proposed 134-mile fiber optic network.

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

Pima County can draw on some of the training opportunities offered through the H-1B program to ensure that it has skilled workers in the IT field, including individuals who can help support the laying of the fiber optic and the subsequent maintenance. Finally, Pima County's Business Services offices works with existing and potential employers to understand what their employee needs are and to understand the skills and credentials required to fill those positions. With that understanding, Pima County can develop tailored pathways, which can include on-the-job training resources, to help meet the education and credentialing requirements for employees interested in training or upskilling. The Middle Mile team will work with all of the CWD resources to ensure a firm plan is developed and implemented to ensure workforce continuity and capacity.

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

Current Pima County employees are scheduled annually to attend the required safety trainings associated with their jobs. Pima County added a heat safety procedure, plan and training this quarter. No other trainings have been offered since we have yet to begin work on construction.

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.

Pima County has a number of policies and procedures in place to ensure the workplace is fair, respectful and equitable. Relevant policies include, without limitation, Workplace Ethics, Conduct and Compliance, Regulatory Bill of Rights--Complaints and Appeals, as well as numerous equal employment, anti-harassment, fair labor standards and civil rights procedures. All new employees receive mandatory training to review these policies and procedures. Pima County has in place several mechanisms to report alleged violations or to file grievances. The County encourages its employees to informally seek resolution to complaints or problems (except in serious situations such as grievances pertaining to Letters of Reprimand and allegations of harassment), with all employees required to cooperate in grievance proceedings. The informal route is sought as a more appropriate and faster resolution of issues, with the likelihood of a positive outcome for all participants. The County also has strict rules in places to prevent retaliation, including the possibility of employment termination. The County also has mechanisms in place to work with its union partners cooperatively to create a harmonious working environment that leads to improved provisions of county services. Called the Meet & Confer Committee, this group meets to confer regarding labor-management relations by fostering a forum for the free discussion of mutual concerns and ideas. These policies and mechanisms allow for the County to address labor concerns before they reach a disruptive level. For procurement contracts, the County includes labor and employment compliance requirements in the contracts, including compliance with all federal requirements (such as compliance with Davis-Bacon prevailing wage/certification/payroll/signage requirements and Build America/Buy America). The County also investigates potential contractors to ensure that partner is in good standing with the federal government and has not been suspended or disbarred. The County will also require the contractor to flow down all of these requirements to any subcontracting partner engaged. By adhering to standards designed to treat employees fairly and respectfully, the County believes that labor disruptions will be minimized.

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.

Pima County's goal is to provide a comfortable, clean, safe and functioning work environment. One core function of the County's Facilities Management Department is to assure the safety of all Pima County employees in their work activities and areas of employment. The County fulfills this goal in several ways. First, it maintains a number of administrative procedures to assure safety protocols are followed, contained in Title 30, Risk Management, of the County's Administrative Procedures. These procedures include, without limitation, Drug-Free Workplace, Facility Emergency Action Plan, Driver Qualification and Authorization; Hazard

Communication Program, and the Hearing Conservation Program. Additionally, Facilities Management's Safety and Loss Prevention division promotes safety in the workplace through workplace inspections and observations; monitoring and investigation of potential hazards and employee safety training. This training is offered at no cost to all Pima employees, via both online training and in-person classes. The training includes annual safety compliance training and optional trainings such as fall protection, forklift training and van training. The County's on-line courses are diverse, covering topics such as forklift safety, electrical safety, and staff safety training. In terms of County staff working on technical projects, the County generally includes certification or training requirements that correspond to the requirements of the particular job. For example, for an open electrician position within the County, the County will list the knowledge and skills required and minimum qualifications, which include completion of an industry-recognized apprenticeship program in industrial and commercial electrical installation and repair and one year of journey-level experience in the same, five years of journey level experience in industrial and commercial electrical installation and repair, and several other means to meet the qualification that all require some level of training in the specific job category. Pima County recently adopted administrative procedures to create heat-related safety protocols, and passed an ordinance to help protect individuals who work outdoors who are higher risks of heat-related illness, injuries and potentially death. The policies direct County departments with employees exposed to outdoor work to develop protocols to mitigate that risk. Contractors doing business with the County with workers or contract employees working at hot sites must have a Heat Injury and Illness Prevention Safety Plan in place to continue doing business with the County. This will impact contractors that ultimately are engaged to install the County's middle mile broadband infrastructure.
13d. For your MM project, please provide a brief description below of efforts made to ensure a safe and healthy workplace.
Much of the workplace associated with this project will be beyond the County's physical facilities and along rights-of-way owned by the County. These workplaces will be under the direction and control of contractors engaged by the County. Any contract executed by the County will set forth the work requirements, a listing of the types of labor that will be required and will require the contractor to ensure that it hires only duly qualified and certified workers, suitable to perform the types of work for which it is being engaged. Contractors will also be required to comply with all federal, state, and local requirements, including the Occupational Safety and Health Administration requirements to ensure a healthy and safe work environment. Contractors will also be required to include these provisions in any subcontract awarded. The County will have the right to terminate any contract where there is a lack of compliance with these provisions. The County will actively monitor and inspect the worksite locations to ensure that the workplace remains safe and healthy, thus avoiding undue delays. For this reporting period, no contractors were engaged, and the only workplace sites were Pima County facilities. Pima County recently adopted administrative procedures to create heat-related safety protocols, and passed an ordinance to help protect individuals who work outdoors who are higher risks of heat-related illness, injuries and potentially death. The policies direct County departments with employees exposed to outdoor work to develop protocols to mitigate that risk. Contractors doing business with the County with workers or contract employees working at hot sites must have a Heat Injury and Illness Prevention Safety Plan in place to continue doing business with the County. This will impact contractors that ultimately are engaged to install the County's middle mile broadband infrastructure.
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
Pima County Community Workforce Development works with Western Arizona College and Pima Community College on a certificate program for Broadband Fiber Optic Technicians. This program provides One Stop participants with access to a career path and greater financial stability in the family. Additionally, new apprenticeship program partnerships with local unions have been developed for implementation during FY2027.

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
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.			
The project has no sub-contracted entities during this reporting period.			

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: Pima County_04-40-MM588_AI_092025.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-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	0					
16b. Total of fiber miles leased	0	0	0	0	0					
16c. Total of existing fiber miles upgraded	0	0	0	0	0					
16d. Total number of new microwave links	0	0	0	0	0					
16e. Total number of new towers	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)										
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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	buried	Buried	Buried	Buried					
17a-2. Number of strands deployed	0	0	0	0	0					
17a-3. Number of miles of buried fiber deployed	0	0	0	0	0					
17a-4. Number of miles of aerial fiber deployed	0	0	0	0	0					
17a-5. Estimated capacity of fiber (i.e. throughput)	0	0	0	0	0					
17a-6. Deployment cost per mile of buried fiber optics	\$0.00	\$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	\$0.00					
17a-8. Total Spent on Buried Fiber Deployment this reporting period	\$0.00	\$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	\$0.00					

17a-10. Total spent on Fiber Deployment this reporting period	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00					
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17a. Fiber Optic Based ***	Year 6		Year 7		Year 8		Year 9		Year 10	
	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?										
17a-2. Number of strands deployed										
17a-3. Number of miles of buried fiber deployed										
17a-4. Number of miles of aerial fiber deployed										
17a-5. Estimated capacity of fiber (i.e. throughput)										
17a-6. Deployment cost per mile of buried fiber optics										
17a-7. Deployment cost per mile of aerial fiber optics										
17a-8. Total Spent on Buried Fiber Deployment this reporting period										
17a-9. Total Spent on Aerial Fiber Deployment this reporting period										
17a-10. Total spent on Fiber Deployment this reporting period										

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)	Not applicable
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. 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					
17b-7. Total spend on Tower deployment this reporting period	\$0.00	\$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	\$0.00					

17b. Microwave Based ***	Year 6		Year 7		Year 8		Year 9		Year 10	
	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?										
17b-2. How many microwave nodes are operating for reporting period?										
17b-3. Installation cost per microwavable node										
17b-4. Number of new towers built to support microwave structure										
17b-5. If applicable, what type of tower was constructed (a) Monopole (b) Self-Support, (c) Guyed, or (d) Other during this reporting period?										
17b-6. Average cost per tower installed										
17b-7. Total spend on Tower deployment this reporting period										
17b-8. Total spend on microwave deployment this reporting period										
17b. Microwave ***, Long Text Responses and File Uploads										
Current Period (Year 3, Period 1)										
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).	Not applicable									
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	None	0	0					
17c-2. What is the estimated capacity of the satellite link (i.e. throughput)?	0	0	0	0	0					
17c-3. What is the associated cost to use this satellite service?	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00					

17c. Satellite ***	Year 6		Year 7		Year 8		Year 9		Year 10	
	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?										
17c-2. What is the estimated capacity of the satellite link (i.e. throughput)?										
17c-3. What is the associated cost to use this satellite service?										
17c. Satellite ***, Long Text Responses and File Uploads										
Current Period (Year 3, Period 1)										
17c-4. Please provide any additional information about the Satellite deployment (200 words or less)	Not applicable									
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.

I certify to the best of my knowledge and belief that the Pima County Middle Mile Fiber Optic Project is in compliance with Federal labor and employment laws along with the requirements of the Infrastructure Investment and Jobs Act and Enabling Middle Mile Broadband Infrastructure Grant Program for the bi-annual period of 04/01/2025-09/30/2025.
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.
I certify to the best of my knowledge and belief that the Pima County Middle Mile Fiber Optic Project is in compliance with the Build America, Buy America Act. File Uploaded: MMG Inventory Report_4-40-MM588_Final.xlsx, MMG Inventory Report_4-40-MM588_Final.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:	Michelle Simon
20b. Signature of Certifying Official:	Michelle Simon
20c. Telephone (area code, number and extension):	5207247694
20d. Email Address:	michelle.simon@pima.gov
20e. Date:	12/15/2025