

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	WANRACK, LLC	OMB Control No.	OMB Control No. 0660-0052
		Expiration Date	Exp. Date: 2/28/2027

Middle Mile Grant Program Bi-Annual Performance Report				
A. GENERAL INFORMATION				
1a. Recipient Organization:	WANRACK, LLC	1h. Award Identification Number:	20-40-MM553	
1b. Recipient Street Address:	4550 W 109TH ST STE 115	1i. Report Date (MM/DD/YYYY):	11/06/2025	
1c. City, State, and Zip Code:	OVERLAND PARK, Kansas 66211-1305	1j. Final Report:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> X
1d. Unique Entity Identification (UEI) Number:	J6YHGXRXUF5	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):	06/30/2025	1g. Name of Person Completing Report: Sherry Harrison		
B. PROJECT NARRATIVE				
<p>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.</p>				
2a. A brief description of the recipient's organization and scope of work/project priorities.	WANRack is a broadband provider which provides fiber connectivity in 23 states. The scope of this project is to build a middle mile from the northern part of Polk County, going West into Pasco, running through Zephyrhills and Dade City, continuing to run north into Hernando County.			
2b. An overview of the significant outputs and outcomes to be accomplished in the project.	WANRack applied to build this middle mile with two goals in mind. Increase middle mile offerings in the area to help drive down cost and increase connectivity options in the project area			

2c. How would the project meet the recipient's business and/or administrative need(s)?	WANRack aims to be a broadband provider across the Central Florida region. WANRack aims to have a redundant, open access middle mile to help provide a multitude of broadband services including wholesale and last mile service. This project helps tie in two current existing networks in Polk and Hernando counties, passing multiple communities along the way.
2d. Provide an overview of key accomplishments achieved for this reporting period on the MM infrastructure project.	The project construction was completed in early June 2025, and all OTDR testing was complete and operational.
2e. Provide any roadblock experienced during this reporting period impacting the expansion of the MM infrastructure project (i.e., supply chain, availability of labor).	At this time, as previously discussed with Program Officers, the State of Florida has required that WANRack relocate 4 miles of newly buried fiber, to accommodate a road expansion project. Once the relocation and maintenance project is complete, we will be able to continue to look at servicing other institutions.
2f. Provide any barriers to improving job quality experienced during this reporting period.	No barriers to report.

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

Overall Project	730	2023-07-01	2025-06-30	10%	50%	90%	100%	%	%	%	%	%	%
Environmental Assessment	172	2023-07-01	2023-12-20	100%	%	%	%	%	%	%	%	%	%
Network Design	183	2023-07-01	2023-12-31	100%	%	%	%	%	%	%	%	%	%
Rights Of Way				0%	%	%	%	%	%	%	%	%	%
Construction Permits And Other Approvals	181	2024-01-01	2024-06-30	0%	100%	%	%	%	%	%	%	%	%
Site Preparation	151	2024-02-01	2024-07-01	0%	85%	100%	%	%	%	%	%	%	%
Equipment Procurement	89	2025-01-01	2025-03-31	0%	0%	100%	%	%	%	%	%	%	%
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	394	2024-04-01	2025-04-30	0%	35%	70%	100%	%	%	%	%	%	%

Equipment Deployment	60	2025-05-01	2025-06-30	0%	0%	0%	100%	%	%	%	%	%	%
Network Testing	29	2025-06-01	2025-06-30	0%	0%	0%	100%	%	%	%	%	%	%
Status of Procurement				%	%	%	%	%	%	%	%	%	%

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

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

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

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

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

ACTUAL PROJECT MILESTONES***		Year 1		Year 2		Year 3		Year 4		Year 5		
		Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	
4a. MILESTONE	4b. DESCRIPTION	Actual Milestone Completion (Cumulative)										
Overall Project	The project is now 100% complete, has been tested and is fully operational. Please note that after final splice and testing, the State of Florida required WANRack to relocate approximately 4 miles of the fiber to accommodate roadway changes. That maintenance project is nearly complete as well, though most changes occurred after the June 30, 2025 project end date.	0%	0%	60%	70%	100%						
Environmental Assessment	All environmental assessments have been completed.	0%	90%	100%	100%	100%						

Network Design	Network design of the project is fully complete.	10%	90%	100%	100%	100%					
Rights Of Way	All rights of way were obtained and in place for the project.	0%	0%	60%	100%	100%					
Construction Permits And Other Approvals	All construction permits and other approvals for the project have been obtained.	0%	0%	100%	100%	100%					
Site Preparation	All site preparation for the project is complete.	0%	0%	90%	100%	100%					
Equipment Procurement	Equipment procurement for this project is complete.	0%	0%	100%	90%	100%					
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	The network build for this project is complete.	0%	0%	60%	70%	100%					
Equipment Deployment	Equipment deployment for this project is complete.	0%	0%	0%	70%	100%					
Network Testing	Network testing has occurred for this project and is complete.	0%	0%	0%	30%	100%					
Status of Procurement	Procurement for this project is complete.	0%	0%	100%	85%	100%					

Subrecipient and Subawards											
List of Subrecipient(s) that received a subaward or subcontract from the eligible entity and a description of the specific project for which grant funds were provided.											
Associate projects names to any subrecipient or subaward associated with grant, approved grant funds, and expenditures to date.											
5a. Project Name	Status	5b. Project Description	5c. Subrecipient	5d. Minorit y Busines s Enterpri se (MBE)	5e. Women' s Busines s Enterpri se (WBE)	5f. Labor Surplus Area Firm	5g. Awarde d Funds	5h. Expendi tures to Date	5i. Remaini ng Grant Balance	5j. % of work complet e	
Environmental / Engineering	Active	Engineering Services for full route including NEPA study	TEP OpCo, LLC	false	false	false	\$665366 .36	\$665366 .36	\$0	100 %	
Engineering and Construction	Active	Engineering and Construction Services for full route	KCI Technologies	false	false	false	\$9750	\$9750	\$0	100 %	
Signage	Inactive	Create and produce signage	Transportation Solutions & Lighting, Inc.	true	true	false	\$3416	\$3416	\$0	100 %	
Construction of the network and Engineering	Active	Some engineering and construction of the network infrastructure	KCI Communication Infrastructure	false	false	false	\$220095 0.44	\$220095 0.44	\$0	100 %	

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	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Land, structures, rights-of way, appraisals, etc.	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Relocation expenses and payments	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Architectural and engineering fees	\$144,883.20	\$150,796.80	\$295,680.00	\$144,314.88	\$150,205.28	\$294,520.16	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	\$56,056.00	\$58,344.00	\$114,400.00	\$55,670.35	\$57,942.61	\$113,612.96	99%
6a. Site work	\$56,056.00	\$58,344.00	\$114,400.00	\$55,670.36	\$57,942.61	\$113,612.97	99%

6a. Demolition and removal	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Construction	\$1,591,934.54	\$1,656,911.46	\$3,248,846.00	\$1,333,191.85	\$1,387,607.84	\$2,720,799.69	84%
6a. Equipment	\$803,981.65	\$836,797.23	\$1,640,778.88	\$735,420.95	\$765,438.14	\$1,500,859.09	91%
6a. Miscellaneous	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Subtotal	\$2,652,911.39	\$2,761,193.49	\$5,414,104.88	\$2,324,268.39	\$2,419,136.48	\$4,743,404.87	88%
6a. Contingencies	\$159,174.68	\$165,671.61	\$324,846.29	\$5,190.08	\$5,401.92	\$10,592.00	3%
6a. Totals	\$2,812,086.07	\$2,926,865.10	\$5,738,951.17	\$2,329,458.47	\$2,424,538.40	\$4,753,996.87	83%

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 market, education and training opportunities, sub-contracting to local small business for construction, services, and supply chain needs).	
Description of Community Agreement	

7a. Community Benefit Group Name: Please provide the name of the Community Benefit Group	
7b. Developer Name: Please provide the name of the Developer.	These questions were answered via file upload. Number of Community Agreements: 0 File(s) Uploaded with Responses:
7c. Community Benefit Group and Developer Partnership: Please describe in the space below the nature of the partnership and how the MM grant funds being used are assisting to provide community support for the infrastructure project.	

F. CLIMATE RESILIENCE				
<p>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.</p>				
<p>Climate Resiliency Risk Mitigation</p> <p>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.</p>				
<p>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.</p>				
<p>No</p>				
8b. Climate Resilience Category	8c. Date of Most Recent Hazard Screening	8d. Name and Title of Representative Completing Most Recent Hazard Screening	8e. Date of Report Completion	

Files Uploaded for Hazard Screening Information: WANRack Hazard Screening Information 6.2026.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)?

As with all of Florida, due to the projected increase in temperatures and climate trends over the next 25 years (Kunkel et al 2022), the most expected issues for Florida counties Polk and Hardee, are a general increase in temperatures resulting in greater numbers of extreme heat days. These issues will exacerbate the drought potential for a region which already experiences some degree of drought each decade. At the same time, it will create more dangerous conditions for wildfires in a region that has historically had only a moderate amount. Additionally, these impacts on the climate are likely to result in increasingly more and severe flooding, hurricanes and severe weather patterns (Kunkel et al 2022) in a region that already has a high flood risk Per FEMA's index (National Risk Index 2021). Likely the most threatening climatic change is the greater frequency and intensity hurricanes have exhibited in recent years (NOAA Storm Event Database, 2022). Hurricanes are expected to continue to worsen in the coming years due to atmospheric warming which will result in a greater number of category four and five storms making landfall in Florida (NOAA Storm Event Database, 2022). Warmer water resulting from a warmer atmosphere provides the energy for tropical storms to transition to a hurricane at a much faster rate and the problem is likely to only get worse as the atmosphere continues to warm. Though the counties that this project is located in are inland, any infrastructure will still be vulnerable to the flooding and damaging winds associated with a hurricane making landfall.

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

Climate change, and the expected warming associated with it, is increasing storm events and wildfires within the state of Florida (National Risk Index 2021) (Living Atlas). As the majority of our cables were installed underground, it will be well insulated from climatic events such as wildfires and flooding. This project offers a larger system that can support or replace smaller systems, eliminating the need for having duplicate systems in a single area. The risk of sediment leaving the work site is also a concern that has been taken into account. The method of installation, vibratory or static plow, caused minimal soil runoff as the area of installation is only a few inches wide and the soil was stamped down shortly after installation. In areas where bore pits were necessary to cross obstacles, such as roads and wetlands, some soil disturbance was unavoidable. These areas are small as well, consisting of less than 20 square feet. According to the data from NOAA and other sources identifying regions at risk from climate change, this region has a less than 0.4% chance of coastal inundation (FEMA 2021).

With more than 200 years of experience, WANRack managers and staff are dedicated to making sure our projects are properly monitored and evaluated, and this grant project is no different. All permitting was completed to any city, county, and state standards, prior to construction starting. Due to some sensitive forest, waterway, and environmental areas within the project, permitting included stormwater pollution prevention plans, Department of Natural Resources, Army Corps of Engineers, Department of Transportation, county, city, township, and easements, especially in environmentally sensitive areas. Generally, during the construction process our team held daily and weekly communications among contractors, construction crews, engineering staff, and clients to ensure that the cable was placed correctly and with the most efficient method. Real-time data was also collected in the field by inspectors. Fiber optic cables that were placed are water and weather resistant. No issues with reliability of the system was discovered or noted.

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.

No risk identified. However, any future risks identified will be assessed with attention to the NOAA State Climate Summary, FEMA Floodplain maps and professional studies on climate change and ecological issues. The overall length of this project is approximately 287,676 feet, or 54.48 miles. The routing of this project is within two Florida Counties which are: Polk and Hardee. The majority of the routes are in FDOT roadways, but there are sections within County roads and occasionally city roads. According to the NOAA state climate summaries, Florida has seen an increase in average temperature of 2% since the beginning of the 20th century. Increased warming will result in ground water evaporating much quicker, increasing natural droughts (Kunkel et al 2022). This has in turn caused an increase in destructive wildfires that are not historically common in the region. Flooding is also a climate factor that is projected to get worse, as storms and hurricanes dump large amounts of water more frequently as the climate warms (NOAA Storm Events Database, 2022). This project consists mostly of subterranean installation of broadband cables with above ground installation only where necessary, with just over 1.2 miles being aerial. This underground installation will insulate the cable infrastructure from heat, wildfires, floods, and increased hurricane and storm activity. Broadband options will connect rural communities to other locations around the world. Studies from the World Economic Forum in 2022 show that broadband can help reduce greenhouse gas emissions by creating resilient networks to keep technologies like electric car grids and other smart energy sources going (World Economic Forum 2022). Because this route was established along a busy highway road system, this type of technology is important. This connectivity will also allow residents to have early warning for the climatic challenges the region will face in the future. Disasters move quickly, whether a wildfire, flash flood, or hurricane, the speed in which residents are able to respond to these events can save lives and property (Woodhouse, 2021). The project includes farmland and citrus groves, industries which rely on technology and data collection for efficiency. This improved system will link data collection and assist farmers and orchardists by improving remote spatial data collection methods, allowing them to adapt to climate changes quicker and more efficiently (Shafqat et al 2021). An example of this would be that high-speed internet options would allow the use of software and apps that assist in managing timeframes for the treatment of crops and orchard trees with pesticides, reducing waste and increasing productivity. This project will take stress off an aging system and connect to a larger existing network infrastructure that connects to other markets. WANRack utilizes an existing data center in Lakeland, which already has adequate battery backup and generators to support the network equipment in the event of a power outage. In addition, WANRack has deployed battery backup systems and standby generators at hut or cabinet sites deployed as part of this project. The proposed location of this project was established by making sure that the largest amount of potential rural customers have access, while using road rights of way for easy installation and maintenance through time, to adapt to any environmental issues, either natural or man-made.

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?

With several remote employees and vendors stationed in Florida, WANRack feels it is able to easily manage the network and its continued resiliency.

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

Yes, for mitigation and long-term planning efforts, the team has utilized NOAA Storm Event Database, FEMA National Risk Index, NOAA State Climate Summary, FEMA Floodplain maps, professional studies on climate change and ecological issues relevant to the route of our network, NOAA Disaster and Risk Mapping Tool, stormwater pollution prevention plans, Army Corps of Engineers, and Department of Natural Resources.

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																		Totals	
	Race/Ethnicity																			
	9b. Hispanic or Latino		9c. Non-Hispanic/Non-Latino																	
			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	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%							
Number of Local Subcontractors	10	3		10	8	0	0	0	0	0	0	0	0	0							31
Number of Non-Local Subcontractors	0	0		0	0	0	0	0	0	0	0	0	0	0							0
Percentage of Local Subcontractors on Award	100%	100%		100%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%							

Davis-Bacon Act Wages

Please confirm if wages are at least prevailing*

*As stated in the MM NOFO as determined by the U.S. Secretary Labor in accordance with subchapter IV of chapter 31 of title 40, United States Code (commonly known as the "Davis-Bacon Act"), for the corresponding classes of laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the State (or the District of Columbia) in which the work is to be performed.

10a. Are wage rates at least the Davis-Bacon prevailing wage for all laborers?

No

10b. Please cite your source of how this information was gathered (for 10a).	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. For this grant award, the project is less than the \$5,000,000 minimum and therefore, no laborers hired/currently employed are subject to Davis-Bacon prevailing wages.
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).	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. For this grant award, the project is less than the \$5,000,000 minimum and therefore, no mechanics hired/currently employed are subject to Davis-Bacon prevailing wages.
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.	WANRack Cert 10e upload 10.2025.pdf

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		

Workforce Demographic Data																					
	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?	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.

WANRack, LLC (WANRack), along with its selected fiber construction contractor(s) and any associated subcontractor(s), will share the objective of developing a skilled workforce to effectively perform the fiber construction within the proposed project areas. The fiber construction contractor(s) will be required to employ the necessary number of skilled laborers to comply with the requirements of the NTIA, licensure or certification requirements, and the project timeline as set forth in the contract.

WANRack will strongly encourage the contractor(s) to leverage various training programs, such as Registered Apprenticeships, to train and develop workers in order to generate a larger, skilled workforce. If the contractor(s) and/or subcontractor(s) have unionized employees, the contractor(s) may coordinate jointly alongside the regional and national affiliations of the local union in order to identify and hire skilled individuals that, if possible, are local to the project area(s). The union may also assist in referring qualified individuals to apprenticeship and other training programs. All efforts in this area made by WANRack and its contracted entities, union or nonunion, are made with the objective to positively benefit not only this project, but also future broadband infrastructure projects, by increasing the number of highly skilled individuals. Promoting workforce development in this proposed project, via training programs, apprenticeships, and other work-based learning programs, creates an opportunity to reconfigure the local workforce to address the need for more broadband infrastructure projects in the future.

WANRack intends to work with local technical colleges, as well as established staffing agencies, to fill its respective workforce needs. In addition, WANRack may utilize apprenticeships and training programs to enhance the skills of its staff. Several large fiber construction contractors have developed detailed, internal training centers to develop knowledge, skill, and field experience for new staff. These training centers are especially beneficial to underrepresented populations that traditionally have not participated in broadband jobs due to barriers associated with tuition and education opportunities.

WANRack currently works with multiple state offices, for example in Kansas and Ohio, to promote the development of workforce programs. Additionally, WANRack offers an internship program that allows individuals an opportunity to develop and learn skills necessary for careers in the telecommunications industry or other similar IT and construction companies. WANRack has also developed its own internal training program, working alongside external vendors, to reinvest in its own workforce by keeping it current with industry standards. In addition to its own internal implementation steps, WANRack will make every effort to ensure that the workforce development objectives can be achieved by its contracted entities. During the pre-bid process with prospective bidders, WANRack will inquire with those contractors regarding their current strategies and prior history with regards to implementing workforce development programs. WANRack may reserve the right to contractually obligate the Contractor(s) and Subcontractor(s) to fulfill workforce development objectives, subject to regular review, for the duration of the proposed project.

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

WANRack, LLC (WANRack), along with its selected fiber construction contractor(s) and any associated subcontractor(s), will share the objective of developing a skilled workforce to effectively perform the fiber construction within the proposed project areas. The fiber construction contractor(s) will be required to employ the necessary number of skilled laborers to comply with the requirements of the NTIA, licensure or certification requirements, and the project timeline as set forth in the contract.

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regards to implementing workforce development programs. WANRack may reserve the right to contractually obligate the Contractor(s) and Subcontractor(s) to fulfill workforce development objectives, subject to regular review, for the duration of the proposed project.

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

The WANRack team encouraged professional certifications, additional training opportunities and in-house training (also offered through its contractors).

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.

WANRack maintains comprehensive corporate policies related to, and has continually operated its business since formation more than ten years ago in compliance with, all federal labor and employment laws. These laws include, but are not limited to, those related to wages and hours, workplace safety and health, employee benefits, unions and their members, worker's compensation and employee protection. There have been no instances in the preceding three years where WANRack has been found to have violated laws such as the Occupational Safety and Health Acts, the Fair Labor Standards Act, or any other applicable labor and employment laws. While WANRack's contractors and subcontractors operate independently, all Master Service Agreements WANRack enters into with its contractors require the contractor to and ensure its subcontractors comply with all laws applicable to delivery of these services, including federal labor and employment. WANRack is not aware of any instances in the preceding three years where any of its contractors or subcontractors has been found to have violated laws such as the Occupational Safety and Health Acts, the Fair Labor Standards Act, or any other applicable labor and employment laws. WANRack has utilized contracts on a wide variety of middle mile projects similar to the proposed project with no instances of violations of federal labor and employment laws. WANRack advises all of its employees performing work related to the proposed project of the continual need to comply with all applicable federal labor and employment laws. In addition, WANRack ensures all contracts engaged to provide services related to the proposed project will comply with, and ensure all of its subcontractors comply with, all applicable federal labor and employment laws. WANRack is committed to strong labor standards and protections for the project workforce (including contractors and subcontractors), which include:

- Using a directly employed workforce supplement by a subcontracted workforce;
- Use of labor peace agreements;
- Use of an appropriately skilled workforce (e.g., through Registered Apprenticeships or other joint labor-management training programs that serve all workers, particularly those underrepresented or historically excluded);
- Use of an appropriately credentialed workforce (i.e., satisfying requirements for appropriate and relevant pre-existing occupational training, certification, and licensure); and
- Taking steps to prevent the misclassification of workers.

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.

WANRack has utilized third-party contractors to perform fiber construction on its various projects. These contractors have established safety programs that they follow to ensure the health and wellbeing of their construction staff. The monthly safety training sessions typically conducted by these fiber construction contractors, in compliance with OSHA standards, include a wide range of specific areas from best practices regarding hazardous waste, work zone safety, and fall protection in construction zones. These monthly training sessions can also be specifically tailored towards an upcoming project, such as the proposed middle mile construction project. WANRack will contractually require all contractors and subcontracted entities to maintain safety training records and certifications, and it reserves the right to perform periodic checks to ensure compliance with all applicable federal, state, and local labor certifications.

WANRack has a workplace safety manager and an internal safety program as part of a planned corporate expansion. WANRack's expected goal of the safety program is to ensure its employees are properly trained in workplace safety techniques, provided appropriate PPE and safety materials, and to reinforce those safety rules at appropriate time intervals.

In addition to its internal safety program, WANRack will ensure that a workplace safety committee is active and authorized to raise health and safety concerns associated with the proposed project. This committee will be accessible to employees of WANRack, the Contractor(s), and Subcontractor(s), and it will have the authority to make recommendations to WANRack's management team regarding corrective actions pertaining to any health and safety concerns associated with the proposed NTIA MMG project. WANRack will reserve the right to require the removal of the Contractor, Subcontractor(s), or employees thereof, based on contractual violations, construction quality issues, safety concerns, noncompliance of the fair labor practices clause, or cause. In the event of any removal, the individual entities and/or individual personnel will be replaced within a

reasonable timeframe so as not to affect the project timeframe or compliance with applicable local, state, and federal labor and employment laws. This helps to ensure that any issues that may arise concerning the skill or competency of the Contractor(s) or the individual personnel employed by the Contractor(s) can be swiftly and adequately addressed.

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

As with any WANRack project, WANRack reserves the right to require the removal of the Contractor, Subcontractor(s), or employees thereof, based on contractual violations, construction quality issues, safety concerns, noncompliance of the fair labor practices clause, or cause. In the event of any removal, the individual entities and/or individual personnel will be replaced within a reasonable timeframe so as not to affect any project timeframe or compliance with applicable local, state, and federal labor and employment laws. This helps to ensure that any issues that may arise concerning the skill or competency of the Contractor(s) or the individual personnel employed by the Contractor(s) can be swiftly and adequately addressed.

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

Yes, WANRack has offered continuous safety training, encouraged workers to complete certifications and/or licensure requirements for all relevant work (as well as encouraging the contractors performing work on the project to do the same). Enforcement of safety issues mandated by corporate policies and any relevant resolutions relating thereto occurs at all WANRack project sites.

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
TEP OpCo, LLC	Active	22	Construction Laborers
KCI Technologies	Active	7	Engineers
Transportation Solutions & Lighting, Inc.	Active	2	Signage creation
KCI Communications Infrastructure	Active	4	Construction, Engineering, Project Management

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.

Davis-Bacon does not apply on this project and we have no direct hires.

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

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

These questions were answered via file upload.

File Uploaded with Responses: List of anchors within 1000 feet by Brian Turner.pdf

J. BROADBAND ACCESS KEY INDICATOR: SUBSCRIBERS AND SPEED

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

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

PROJECTED NUMBER OF SUBSCRIBERS AND SPEED	Year 1		Year 2		Year 3		Year 4		Year 5	
ACCESS TYPE	Period 1	Period 2								

15a. Anchor Institutions (AIs)***								
15a-1. Total Number of AIs passed	0	0	81	81	81			
15a-2 Number of AIs within 1,000 feet of the middle mile infrastructure	0	0	81	162	162			
15a-3. Total number of AIs served	0	0	0	162	162			
15a-4. AIs with new access	0	0	0	162	162			
15a-5. AIs with improved access	0	0	0	162	162			
15a-6. Total number of AIs served with speeds of at least 1/1Gbps	0	0	0	162	162			
15b. Broadband Wholesalers or Last Mile Providers***								
15b-1. Total number of broadband wholesalers or last mile providers served	0	0	24	24	24			
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			

K. BROADBAND ACCESS KEY INDICATOR: NETWORK BUILD PROGRESS

Please use the following table to provide anticipated key indicators and progress of your Infrastructure project. Except as indicated, information should be reported cumulatively from award inception through the end of the bi-annual period. Please write the number "0" if your project does not include this indicator.

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

KEY INDICATOR	Year 1		Year 2		Year 3		Year 4		Year 5	
	Period 1	Period 2								
16a. Total of new fiber miles (aerial or buried)	0	0	30	45	54					
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					
16f. Total number of new interconnection points	0	0	51	159	0					
16g. Total number of signed agreements with broadband wholesalers or last mile providers	0	0	0	0	0					
16h. Total of potential agreements (i.e., agreements currently being negotiated) with broadband wholesalers or last mile providers (This Total should NOT be reported cumulatively)	0	0	0	0	0					

L. QUANTIFIABLE METRICS

Quantifiable Metrics - Section designed to assist with **reporting** and **audit** purpose to quantify how much progress was made and track the location of where the progress was made.

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

17a. Fiber Optic Based ***	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?	0	0	0	buried/aerial	buried/aerial					
17a-2. Number of strands deployed	0	0	0	432	432					
17a-3. Number of miles of buried fiber deployed	0	0	0	44	9					
17a-4. Number of miles of aerial fiber deployed	0	0	0	1	0					
17a-5. Estimated capacity of fiber (i.e. throughput)	0	0	0	800	800					
17a-6. Deployment cost per mile of buried fiber optics	\$0.00	\$0.00	\$0.00	\$80,528.00	\$119,678.31					
17a-7. Deployment cost per mile of aerial fiber optics	\$0.00	\$0.00	\$0.00	\$80,528.00	\$0.00					
17a-8. Total Spent on Buried Fiber Deployment this reporting period	\$0.00	\$0.00	\$0.00	\$3,576,232.00	\$1,077,104.80					
17a-9. Total Spent on Aerial Fiber Deployment this reporting period	\$0.00	\$0.00	\$0.00	\$100,660.00	\$0.00					
17a-10. Total spent on Fiber Deployment this reporting period	\$0.00	\$0.00	\$0.00	\$3,676,892.00	\$1,077,104.80					

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)	
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: WANRack MMG KMZ.null

17b. Microwave Based ***	Year 1		Year 2		Year 3		Year 4		Year 5	
	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-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).	N/A
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								
17c-1. What satellite provider is being used?	N/A	0	0	0	None					
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 ***, 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)	N/A									
17c-5. Please provide the digital mappings (e.g., CAD, Revit, KMZ, KML) for the satellite network accessed during this reporting period.										

Closeout Documents

Instructions:

In addition to completing this Final Annual Performance Progress Report and SF-425 (completed separately in the NGP Portal), please upload all required closeout documents including:

- Tangible Personal Property Report (SF-428, SF-428B, SF-428S)
- Real Property Status Report (SF-429)
- iEdison
- IRB Closure Letter

File Name(s) Uploaded:

WANRack TPP SF428S-2.pdf, WANRack TPP SF428S-1.pdf, WANRack SF429 Cover Page 10.2025.pdf, WANRack SF429A Real Property None to Report 10.2025.pdf, WANRack iEdison 10.2025.docx, WANRack SF428B Final Report.pdf

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.

No labor or employment laws were applicable during this reporting period.

19. Please provide certification evidencing compliance with the Build America, Buy America Act. The Build America, Buy America Act requires that all of the iron, steel, manufactured products (including but not limited to fiber-optic communications facilities), and construction materials used in the project or other eligible activities are produced in the United States unless a waiver is granted.

Please see uploaded file for additional information. Thank you.

File Uploaded: WANRack, LLC BABA Certification 11.6.2025.pdf

20. I certify to the best of my knowledge and belief that this report is correct and complete for performance of activities for the purposes set forth in the award documents.

20a. Typed or Printed Name and Title of Authorized Certifying Official: Sherry Harrison

20b. Signature of Certifying Official: Sherry Harrison

20c. Telephone (area code, number and extension):

20d. Email Address:	sherry.harrison@wanrack.com
20e. Date:	11/06/2025