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	WHIDBEY TELEPHONE COMPANY	**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:	WHIDBEY TELEPHONE COMPANY	**1h. Award Identification Number:**	53-40-MM408					
1b. Recipient Street Address:	14888 STATE ROUTE 525	**1i. Report Date (MM/DD/YYYY):**	12/03/2025					
1c. City, State, and Zip Code:	LANGLEY, Washington 98260-9708	**1j. Final Report:**	**Yes**		**No**	X		
1d. Unique Entity Identification (UEI) Number:	FKPTJRRJNJ62	**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:	Moanalei McManus							
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.	Whidbey Telephone Company is working to provide high quality telecommunications and high speed internet services to South Whidbey Island and Point Roberts, Washington. Whidbey Telephone Company will endure adherence to buildout timeslines and milestons, financial targets, subscription rates and community engagement, as well as environmental safety and adherence to local and state regulations.							

2b. An overview of the significant outputs and outcomes to be accomplished in the project.	Whidbey Telephone Company Middle Mile Infrastructure project will provide funding for construction, improvement, and acquisition of middle mile infrastructure for the underserved community of Point Roberts, Washington, and surrounding areas. This will include marine and terrestrial infrastructure.
2c. How would the project meet the recipient's business and/or administrative need(s)?	This project will provide broadband connectivity between geographically isolated locations.
2d. Provide an overview of key accomplishments achieved for this reporting period on the MM infrastructure project.	We received our final construction permit for the State Route 20 and State Route 525. It frees our team to start the construction phase of this project. We got the final marine survey completed for the marine cable. As well, we received an initial response to our cable ship RFI.
2e. Provide any roadblock experienced during this reporting period impacting the expansion of the MM infrastructure project (i.e., supply chain, availability of labor).	Our roadblocks for this period, was one specific construction permit. This roadblock was finally cleared at the end of the reporting period. We are still waiting on City of Oak Harbor and subsequent permitting. Whidbey Telecom is acquiring right of way permits from the naval air station to access the base.
2f. Provide any barriers to improving job quality experienced during this reporting period.	None at this time.

C. INFRASTRUCTURE MILESTONE CATEGORIES AND PROJECT TIMELINE

Please use the chart below to provide the start date and end date of your project.

	PROJECT DURATION	3a. PROJECT START DATE	3b. PROJECT END DATE
OVERALL PROJECT	1826	07/01/2023	06/30/2028

Please provide the start and end dates for each milestone category of your project. The duration is be based on the start and end dates of each category.

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

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

*** Period 1 ends September 30 and Period 2 ends March 31.

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	1826	2023-07-01	2028-06-30	6%	6%	12%	23%	44%	86%	91%	100%	100%	100%
Environmental Assessment	460	2023-08-21	2024-11-23	75%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Network Design	119	2023-10-06	2024-02-02	10%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Rights Of Way	119	2023-10-06	2024-02-02	10%	100%	100%	100%	100%	100%	100%	100%	100%	100%
Construction Permits And Other Approvals	119	2023-10-06	2024-02-02	%	%	%	%	%	%	%	%	%	%
Site Preparation	1017	2024-03-18	2026-12-30	0%	5%	11%	21%	40%	77%	82%	90%	95%	100%
Equipment Procurement	1017	2024-03-18	2026-12-30	0%	5%	11%	21%	40%	77%	82%	90%	95%	100%
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	1017	2024-03-18	2026-12-30	0%	5%	11%	21%	40%	77%	82%	90%	95%	100%

Equipment Deployment	1017	2024-03-18	2026-12-30	0%	5%	11%	21%	40%	77%	82%	90%	95%	100%
Network Testing	-363	2028-01-06	2027-01-08	0%	0%	10%	20%	40%	80%	100%	100%	100%	100%
Status of Procurement				%	%	%	%	%	%	%	%	%	%

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**
Overall Project	1826	2023-07-01	2028-06-30	%	%	%	%	%	%	%	%	%	%
Environmental Assessment	460	2023-08-21	2024-11-23	%	%	%	%	%	%	%	%	%	%
Network Design	119	2023-10-06	2024-02-02	%	%	%	%	%	%	%	%	%	%
Rights Of Way	119	2023-10-06	2024-02-02	%	%	%	%	%	%	%	%	%	%

Construction Permits And Other Approvals	119	2023-10-06	2024-02-02	%	%	%	%	%	%	%	%	%	%
Site Preparation	1017	2024-03-18	2026-12-30	%	%	%	%	%	%	%	%	%	%
Equipment Procurement	1017	2024-03-18	2026-12-30	%	%	%	%	%	%	%	%	%	%
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	1017	2024-03-18	2026-12-30	%	%	%	%	%	%	%	%	%	%
Equipment Deployment	1017	2024-03-18	2026-12-30	%	%	%	%	%	%	%	%	%	%
Network Testing	-363	2028-01-06	2027-01-08	%	%	%	%	%	%	%	%	%	%
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.

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	State Right of Way permitting is still in progress. Landing site finalization is nearing completion. Overall percentage completion has not changed.	6%	18%	18%	18%	18%					%
Environmental Assessment	Marine survey completed pending final design to support the environment project description. Draft of the project description written up by subcontractor, Environmental Science Associates.	75%	80%	69%	69%	69%					%
Network Design	Marine surveys completed. Final design underway by Wopschall Consulting.	10%	20%	50%	50%	50%					%
Rights Of Way	All Rights of Way with the exception of the City of Oak Harbor is complete.	10%	20%	11%	11%	75%					%
Construction Permits And Other Approvals	Terrestrial construction permits are approximately 90% but no submarine construction permits at this time.	10%	20%	11%	11%	11%					%
Site Preparation	N/A	0%	0%	0%	0%	0%					%

Equipment Procurement	Purchased optical power meter and fusion splicer.	0%	0%	0%	0%	9%					%
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	N/A	0%	0%	0%	0%	0%					%
Equipment Deployment	N/A	0%	0%	0%	0%	0%					%
Network Testing	N/A	0%	0%	0%	0%	0%					%
Status of Procurement	N/A	0%	0%	0%	0%	0%					%

ACTUAL PROJECT MILESTONES* **		**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**
4a. MILESTONE	**4b. DESCRIPTION**	**Actual Milestone Completion (Cumulative)**									
Overall Project	State Right of Way permitting is still in progress. Landing site finalization is nearing completion. Overall percentage completion has not changed.										%
Environmental Assessment	Marine survey completed pending final design to support the environment project description. Draft of the project description written up by subcontractor, Environmental Science Associates.										%
Network Design	Marine surveys completed. Final design underway by Wopschall Consulting.										%

Rights Of Way	All Rights of Way with the exception of the City of Oak Harbor is complete.										%
Construction Permits And Other Approvals	Terrestrial construction permits are approximately 90% but no submarine construction permits at this time.										%
Site Preparation	N/A										%
Equipment Procurement	Purchased optical power meter and fusion splicer.										%
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	N/A										%
Equipment Deployment	N/A										%
Network Testing	N/A										%
Status of Procurement	N/A										%

Subrecipient and Subawards

List of Subrecipient(s) that received a subaward or subcontract from the eligible entity and a description of the specific project for which grant funds were provided.

Associate projects names to any subrecipient or subaward associated with grant, approved grant funds, and expenditures to date.

5a. Project Name	Status	5b. Project Description	5c. Subrecipient	5d. Minority Business Enterprise (MBE)	5e. Women's Business Enterprise (WBE)	5f. Labor Surplus Area Firm	5g. Awarded Funds	5h. Expenditures to Date	5i. Remaining Grant Balance	5j. % of work complete
							$	$	$	%

D. INFRASTRUCTURE BUDGET EXECUTION DETAILS

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

6a. Projected Budget Element	6b. Federal Funds	6c. Non-Federal Funds	6d. Total Project Budget	6e. Total Federal Funds Expended to Date	6f. Total Non-Federal Funds Expended to Date	6g. Total Funds Expended	6h. Percent of Federal Funding Expended to Date (Cumulative)
6a. Administrative and legal expenses	$470,291.30	$201,553.40	$671,844.70	$366,804.44	$157,201.90	$524,006.34	78%
6a. Land, structures, rights-of way, appraisals, etc.	$267,778.14	$114,762.06	$382,540.20	$775,766.22	$332,471.24	$1,108,237.46	290%

6a. Relocation expenses and payments	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	N/A
6a. Architectural and engineering fees	$650,446.27	$278,762.69	$929,208.96	$185,116.96	$79,335.84	$264,452.80	28%
6a. Other architectural and engineering fees	$529,861.82	$227,083.64	$756,945.46	$53,216.86	$22,807.22	$76,024.08	10%
6a. Project inspection fees	$385,839.63	$165,359.84	$551,199.47	$0.00	$0.00	$0.00	0%
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	$9,267,991.07	$3,971,996.17	$13,239,987.24	$0.00	$0.00	$0.00	0%
6a. Equipment	$210,000.00	$90,000.00	$300,000.00	$19,676.09	$8,432.61	$28,108.70	9%
6a. Miscellaneous	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	N/A
6a. Subtotal	$11,782,208.23	$5,049,517.80	$16,831,726.03	$1,400,580.57	$600,248.81	$2,000,829.38	12%
6a. Contingencies	$0.00	$0.00	$0.00	$0.00	$0.00	$0.00	N/A

6a. Totals	$11,782,208.23	$5,049,517.80	$16,831,726.03	$1,400,580.57	$600,248.81	$2,000,829.38	12%

E. COMMUNITY BENEFIT AGREEMENT

As stated in the MM Grant Program NOFO a Community Benefit Agreement (CBA) is an agreement signed by community benefit groups and a developer, identifying the community benefits a developer agrees to deliver, in return for community support of the project.

Please use the fields below to state the Community Benefit Group and Developer Name and describe the activities in how this partnership has supported with the Middle Mile Infrastructure project (i.e. wage agreements, targeting hiring of apprentices and disadvantaged groups in labor marker, education and training opportunities, sub-contracting to local small business for construction, services, and supply chain needs).

Description of Community Agreement

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

F. CLIMATE RESILIENCE

Recipients must demonstrate that they have sufficiently accounted for current and future weather and climate related risks to new MM infrastructure projects. At present, weather and climate related risks to broadband networks include wildfires, extreme heat and cold, inland and coastal flooding, and the extreme winds produced by weather events such as tornadoes, hurricanes, and other weather events. Because retrofitted and new infrastructure for broadband might be expected to have a lifetime of 20 years or more, recipients must account not only for current risks but also for how the frequency, severity, and nature of these extreme events may plausibly evolve as our climate continues to change over the coming decades.

Climate Resiliency Risk Mitigation

This purpose of this section is for the recipient to demonstrate that they have sufficiently accounted for current and future weather and climate-related risks to new MM infrastructure projects. In particular, each recipient should demonstrate how they've addressed the known and identifiable risks of current and future projected weather and climate conditions through measures such as (but not limited to) choice of a technology platform suitable to the climate risk of the region, reliance on alternatives siting of facilities (i.e., underground construction where appropriate), retrofitting, or hardening of existing assets, and use of network redundancy to safeguard against threats to infrastructure.

8a. Were any geographic areas identified for this reporting period subject to an initial and/or updated hazard screening for future weather and climate related risk? If so, please provide the date of the screening and provide related documentation as an attachment to this report.

No

8b. Climate Resilience Category	8c. Date of Most Recent Hazard Screening	8d. Name and Title of Representative Completing Most Recent Hazard Screening	8e. Date of Report Completion

No files uploaded for Hazard Screening.

8f. Identified Risk: For your MM project, what are the potential weather and climate hazards that may be most important to be addressed that could impact the resiliency of the middle mile infrastructure deployed (i.e. wildfires, extreme heat and cold, inland and coastal flooding, extreme winds: tornadoes, hurricanes and other weather events)?

According to the State Route Climate Impact Vulnerability Assessment, the impact category for Whatcom County is low. However, as a coastal area prone to earthquakes, tsunami risk is high. Whidbey Telephone Company will ensure every measure is taken to provide sustainable, solid infrastructure and will work diligently with Atco during the award period to aid in safeguarding the natural, wildlife, and cultural resources of Point Roberts

8g. Weather and Climate Hazards: Were any significant climate or weather hazards experienced during this reporting period (i.e., floods, tornados) impacting infrastructure buildout or service? Briefly describe how you monitored for weather and climate caused issues for the reliability of the system. If so, please provide the date of the disaster, location and backup documentation related (i.e., news articles).

No

No weather or climate risks were experienced during the reporting period.

8h. Risks to Deployment of New Infrastructure: Has the team identified any risks impacting the deployment of new or repaired infrastructure due to current and future weather and climate-related threats during this reporting period?

Yes

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

Whidbey Telephone Company will ensure every measure is taken to provide sustainable, solid infrastructure and will work diligently with Atco. during the award period to aid in safeguarding the natural, wildlife, and cultural resources of Point Roberts.
Use of Horizontal Directional Drilling (HDD): HDD is employed to avoid disturbing sensitive areas, including wetlands and cultural sites, and to minimize surface disruption.
Best Management Practices (BMPs): The project includes erosion control measures such as silt fences, wattles, and other devices to prevent sediment runoff and protect water quality.
Avoidance of Contaminated Areas: The route avoids direct disturbance of known contaminated zones (e.g., Superfund sites near Naval Air Station Whidbey Island). Coordination with the EPA and Navy ensures that construction does not mobilize legacy contaminants.
Health and Safety Planning: Site-specific Health and Safety Plans are required to address potential chemical and physical hazards, including those related to historic contamination. This ensures worker and community safety in the face of environmental risks.
Cultural and Ecological Sensitivity: The project includes tribal consultation and monitoring to protect cultural resources, which also supports broader environmental stewardship goals.

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?

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

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 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

G. Workforce	
For projects receiving over $5,000,000 (based on expected total cost), as determined by the U.S. Secretary of Labor by subchapter IV of chapter 31 of title 40, United States Code (commonly known as the "Davis-Bacon Act"), all laborers and mechanics employed by contractors and subcontractors in the performance of such project are paid wages at rates not less than those prevailing.	
Davis-Bacon Certification	
9a. Does the recipient have access to the information requested (all laborers and mechanics employed by contractors and subcontractors in the performance of such project are paid wages at rates not less than those prevailing?)	Yes
Local Hire Prioritization and Impact	
Local hiring is a goal or requirement to hire people who live close to the place of work. This aim is often more specifically structured as a requirement for contractors awarded certain types of publicly funded projects to recruit a certain proportion of the people working on the project from a particular area. Please **provide all direct hires and contractors supporting** the MM Infrastructure project. Please use the table below to describe how the project prioritizes local hiring.	
Hires by Race,	**Number of Hires**

Ethnicity and Sex	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	0	0		0	0	0	0	0	0	0	0	0	0	0	0						0
Percentage of Local Direct Hires on Award	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%						
Number of Local Subcontractors	0	0		23	0	0	1	0	1	11	0	0	1	0	0						37
Number of Non-Local Subcontractors	0	0		2	0	0	0	0	0	1	0	0	0	0	0						3
Percentage of Local Subcontractors on Award	0%	0%		92%	0%	0%	100%	0%	100%	92%	0%	0%	100%	0%	0%						

Davis-Bacon Act Wages	
Please confirm if wages are at least prevailing*	
*As stated in the MM NOFO as determined by the U.S. Secretary Labor in accordance with subchapter IV of chapter 31 of title 40, United States Code (commonly known as the "Davis-Bacon Act"), for the corresponding classes of laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the State (or the District of Columbia) in which the work is to be performed.	
10a. Are wage rates at least the Davis-Bacon prevailing wage for all laborers?	Yes
10b. Please cite your source of how this information was gathered (for 10a).	None hired to date
10c. Are wage rates at least the prevailing wage for all mechanics?	Yes
10d. Please cite your source of how this information was gathered (for 10c).	None hired to date
10e. If you answered "No" to either 10a. or 10c., please provide an attachment reporting the wages and benefits of workers on the project by job classification, and whether those wages are less than the prevailing wage.	

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

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.

Whidbey Telecom has hired a contractor to provide a turnkey solution for the engineering, permitting, and environmental/cultural reviews. The contractor, Atco, has vetted all subcontractors for the project, providing oversight with these portions of the middle mile project. Each subcontractor is an expert in their field. Any additional engineering, including verifying the work provided by Atco, is provided in-house, where substantial training opportunities are given to new and existing staff members. Non-unionized Whidbey Telecom employees are utilized for this project on a part-time (PTE) basis during the project timeline.

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

Whidbey Telecom will work collaboratively with its employees, partners, contractors, and subcontractors to ensure the project workforce is aptly skillful and credentialed according to the federal and state standards for the physical component of the middle mile infrastructure. The physical project workforce will consist of non-unionized Whidbey Telecom employees, utilized for this project on a part-time (PTE) basis during the project timeline.

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

N/A

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.

Whidbey Telecom has policies and procedures set forth for all employees to mitigate labor disputes and disruptions to ongoing projects. All contractors are bound by these policies.

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.

All Whidbey Telecom employees, partners, contractors, and subcontractors will be trained at the onset of the project on the OSHA and Washington State Department of Labor & Industries' safety standards and when appropriate, traffic control, to ensure safety of the project workforce and the community.
13d. For your MM project, please provide a brief description below of efforts made to ensure a safe and healthy workplace.
All contractor benefits are provide by the individual companies, not Whidbey Telecom. Internally, Whidbey Telecom offers a complete benefit package which includes medical services, retirement, and other benefits.
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
Whidbey Telecom has policies and procedures set forth for all employees to ensure a safe and healthy work environment. Additionally, Whidbey Telecom requires that all contractors must be certified in their respective fields and comply will all pertinent WACs and OSHA standards.

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
Jen-Jay Inc.	Inactive	3	Environmental Surveys
ATCO	Active	15	Primary Engineering Contractor
Westland	Active	7	Environmental and Archeological Surveys
Marker Offshore	Active	4	Submarine Surveys and Engineering
JSI	Inactive	3	Terrestrial Engineering and Staking

ESA	Active	6	Permitting and Licensing
Wopshall Consulting	Active	1	Submarine Surveys and Engineering
Wetland Resources	Active	2	Environmental Consultation

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.

No change from last report 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	No files were uploaded for this nonobligatory section.
14b. Street Address	
14c. City	
14d. State	
14e. Type of Anchor Institution	
14f. Interconnection with 1,000 Feet of AI Enabling Gig Symmetrical Service	
14g. Narrative Description of how the Anchor Institution may benefit from the Grant Funded Infrastructure	

J. BROADBAND ACCESS KEY INDICATOR: SUBSCRIBERS AND SPEED

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

*** Period 1 ends September 30 and Period 2 ends March 31.

PROJECTED NUMBER OF SUBSCRIBERS AND SPEED	Year 1		Year 2		Year 3		Year 4		Year 5	
ACCESS TYPE	**Period 1**	**Period 2**	**Period 1**	**Period 2**	**Period 1**	**Period 2**	**Period 1**	**Period 2**	**Period 1**	**Period 2**
15a. Anchor Institutions (AIs)* **										
15a-1. Total Number of AIs passed	0	0	0	0	0					
15a-2 Number of AIs within 1,000 feet of the middle mile infrastructure	0	0	0	0	0					
15a-3. Total number of AIs served	0	0	0	0	0					
15a-4. AIs with new access	0	0	0	0	0					
15a-5. AIs with improved access	0	0	0	0	0					
15a-6. Total number of AIs served with speeds of at least 1/1Gbps	0	0	0	0	0					
15b. Broadband Wholesalers or Last Mile Providers* **										
15b-1. Total number of broadband wholesalers or last mile providers served	0	0	0	0	0					%
15b-2 Broadband wholesalers or last mile providers with new access	0	0	0	0	0					%
15b-3. Broadband wholesalers or last mile providers with improved access	0	0	0	0	0					%
15b-4. Total number of broadband wholesalers or last mile providers offering speeds of at least 25/3 Mbps	0	0	0	0	0					%

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

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

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

K. BROADBAND ACCESS KEY INDICATOR: NETWORK BUILD PROGRESS

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

*** Period 1 ends September 30 and Period 2 ends March 31.

NETWORK BUILD PROGRESS***	Year 1		Year 2		Year 3		Year 4		Year 5	
KEY INDICATOR	**Period 1**	**Period 2**	**Period 1**	**Period 2**	**Period 1**	**Period 2**	**Period 1**	**Period 2**	**Period 1**	**Period 2**
16a. Total of new fiber miles (aerial or buried)	0	0	0	0	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					

16f. Total number of new interconnection points	0	0	0	0	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					

NETWORK BUILD PROGRESS* **	**Year 6**		**Year 7**		**Year 8**		**Year 9**		**Year 10**	
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)										
16b. Total of fiber miles leased										
16c. Total of existing fiber miles upgraded										
16d. Total number of new microwave links										
16e. Total number of new towers										
16f. Total number of new interconnection points										
16g. Total number of signed agreements with broadband wholesalers or last mile providers										

16h. Total of potential agreements (i.e., agreements currently being negotiated) with broadband wholesalers or last mile providers (This Total should NOT be reported cumulatively)										

L. QUANTIFIABLE METRICS

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

*** Period 1 ends September 30 and Period 2 ends March 31.

17a. Fiber Optic Based * **	**Year 1**		**Year 2**		**Year 3**		**Year 4**		**Year 5**	
	Period 1	**Period 2**	**Period 1**	**Period 2**	**Period 1**	**Period 2**	**Period 1**	**Period 2**	**Period 1**	**Period 2**
17a-1. Is the fiber a buried/aerial or undersea application?	0	0	Buried	Both buried and undersea	Buried and undersea					
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					

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)	N/A
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).	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**	**Period 1**	**Period 2**	**Period 1**	**Period 2**	**Period 1**	**Period 2**	**Period 1**	**Period 2**

17c-1. What satellite provider is being used?	N/A	N/A	None	0	N/A					
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)	N/A
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.

Whidbey certifies compliance with Federal labor and employment laws and requirements of the Infrastructure Investment and Jobs Act and Middle Mile Program for the current 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.
Per administrative letter, not subject to BABA. **File Uploaded:** MMG Inventory Report_10.30.25 OCC 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:	Moanalei McManus
20b. Signature of Certifying Official:	Moanalei McManus
20c. Telephone (area code, number and extension):	3603210068
20d. Email Address:	lei.mcmanus@whidbeytel.com
20e. Date:	12/03/2025