

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	ZAYO GROUP 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:		ZAYO GROUP LLC			1h. Award Identification Number:		08-40-MM216			
1b. Recipient Street Address:		1401 Wynkoop St Ste 500			1i. Report Date (MM/DD/YYYY):		12/15/2025			
1c. City, State, and Zip Code:		Denver, Colorado 80202-1729			1j. Final Report:		Yes		No	X
1d. Unique Entity Identification (UEI) Number:		EACWBKJV6636			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):		06/30/2026								
1g. Name of Person Completing Report:		Mayank Goel								
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.		Founded in 2007, Zayo Group, LLC is the leading independent provider of fiber communications infrastructure in North America. Zayo has over 3,400 employees and delivers an unmatched network that covers 133,000 fiber route miles and 15 million miles of fiber, serving 44,000 one-net buildings, 1,400 on-net data centers, and over 370 cloud on-ramps. The purpose of this project is to provide a unique middle mile fiber network that will serve rural areas that currently have inadequate broadband services. Our network will provide the necessary backbone to deliver broadband to these communities. For many of these communities, the lack of a reliable fiber middle mile network has been the main inhibitor of access to broadband services. The benefits of this project								

	<p>will be profound for these communities. The availability of robust broadband will make possible remote educational opportunities, telemedicine, and reliable public safety communications.</p> <p>Zayo's proposed rescope of this project is to construct 193 route miles of fiber and 2 Intermediate Line Amplifiers (ILAs) huts in California. Zayo is entering a change of scope process with NTIA to request funding for only the California portion of the entire route, however, Zayo will still support the intent of the NTIA Middle Mile Grant Program (MMGP) from Umatillia, Oregon to Reno, Nevada (622 miles and 33 total access points). The route will stretch from Northern Oregon, traveling South through the eastern portion of the State, then through a large section of Northeast California and, ultimately to Reno, Nevada. The entire project will traverses vast regions of underserved communities in Oregon, California, and Nevada where there are high rates of unserved and underserved households, businesses, and community anchor institutions in need of broadband. Additionally, Zayo is partnering with Vertical Bridge, another service provider, to construct middle mile infrastructure in the form of two 180-foot towers that can host up to four last mile wireless Internet Service Providers that will provide fixed and mobile 5G wireless broadband. The cell tower infrastructure enables fixed wireless broadband as well as expanding mobile 5G broadband. Vertical Bridge will contruct two towers along the route.</p> <p>The proposed rescoping includes a Digital Expansion Access Network ("DEAN") that aims to connect last-mile Internet Service Providers in rural areas to more communities at lower costs (similar to metro area pricing). Zayo will provide dedicated fibers as an In-kind IRU and install lit services equipment at Intermediate Line Amplifiers (ILAs) to support this network. This allows ISPs to interconnect at handholds and splice points along the Middle Mile route without requiring costly fiber pairs for backhaul to Tier 1 or Tier 2 Point of Presence (PoPs). This approach simplifies expansion into unserved and underserved areas as demand grows, promoting equitable connectivity.</p>
2b. An overview of the significant outputs and outcomes to be accomplished in the project.	<p>The final outcome of this project is to provide a unique middle mile fiber network that will serve rural areas that currently have inadequate broadband services. Zayo's network will provide the necessary backbone to deliver broadband to these communities. For many of these communities, the lack of a reliable fiber middle mile network has been the main inhibitor of access to broadband services. Zayo worked towards this outcome during this reporting period.</p>
2c. How would the project meet the recipient's business and/or administrative need(s)?	<p>Zayo is committed to reducing the cost of bringing high-speed internet to unserved and underserved communities and to help bridge the digital divide. Zayo accomplishes this goal through strategic partnerships with Vertical Bridge, Education Networks of America (ENA@Zayo) and other leading network providers. Zayo has a created a Government Stimulus Prorams team to apply for, secure, and manage the implementation of government grant opportunities. The NTIA MMGP award furthers Zayo's commitment to be part of the solution in unserved and underserved communities across the United States. This project is major milestone in Zayo's commitment to support nationwide initiatives to bridge the digital divide and enhance network infrastructure.</p>
2d. Provide an overview of key accomplishments achieved for this reporting period on the MM infrastructure project.	<p>Zayo has achieved the following key accomplishments during this reporting period:</p> <ol style="list-style-type: none">1. Completed construction of Fiber Network2. Provided quotes to last-mile carriers under Zayo's Broadband Infrastructure Deployment Alliance (zBIDA). zBIDA empowers broadband providers to secure government funding by leveraging Zayo's expertise and NTIA-funded Middle Mile networks to deliver reliable and affordable Internet access to unserved and underserved communities.3. Catex Approved for 2 towers4. DEAN Network implementation started
2e. Provide any roadblock experienced during this reporting period impacting the expansion of the MM infrastructure project (i.e., supply chain, availability of labor).	<p>No significant roadblocks during this period</p>
2f. Provide any barriers to improving job quality experienced during this reporting period.	<p>No barriers during this period</p>

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	
	1095	07/01/2023	06/30/2026	

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.

[illegible]

Equipment Procurement	488	2023-07-01	2024-10-31	%	%	%	%	%	%	%	%	%	%
Network Build (all components - owned, leased, Infeasible Rights of Use, etc.)	351	2023-11-15	2024-10-31	%	%	%	%	%	%	%	%	%	%
Equipment Deployment	183	2024-07-01	2024-12-31	%	%	%	%	%	%	%	%	%	%
Network Testing	91	2024-10-01	2024-12-31	%	%	%	%	%	%	%	%	%	%
Status of Procurement	365	2024-01-01	2024-12-31	%	%	%	%	%	%	%	%	%	%
Other	820	2024-04-01	2026-06-30	%	%	%	%	%	%	%	%	%	%

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
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		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	Middle Mile infrastructure Project in California (Part of UPR)	15%	25%	65%	97%	98%					%
Environmental Assessment	Completed EA, Desktop Biological Assessment	95%	100%	100%	100%	100%					%
Network Design	Revised New Network Design Complete	80%	95%	100%	100%	100%					%
Rights Of Way	Obtain RoW through Caltrans, BLM, Tribal and Private lands	80%	98%	100%	100%	100%					%
Construction Permits And Other Approvals	Obtain contruction permits	50%	98%	100%	100%	100%					%
Site Preparation	ILA foundation and grading	0%	0%	100%	100%	100%					%
Equipment Procurement	Purchasing of ILA, fiber and materials	80%	80%	80%	90%	95%					%
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	Construct 193 routes miles in CA & build 2 new ILAs	0%	10%	60%	80%	98%					%
Equipment Deployment	Onsite electronic equipment	0%	0%	0%	0%	0%					%

Site Preparation	ILA foundation and grading										%
Equipment Procurement	Purchasing of ILA, fiber and materials										%
Network Build (all components - owned, leased, Indefeasible Rights of Use, etc.)	Construct 193 routes miles in CA & build 2 new ILAs										%
Equipment Deployment	Onsite electronic equipment										%
Network Testing	Verify new circuits and equipment are ready for turn-up										%
Status of Procurement	Fiber Procured, Lit service equipment partially procured										%
Other	Construction of 2 towers										%

Subrecipient and Subawards
List of Subrecipient(s) that received a subaward or subcontract from the eligible entity and a description of the specific project for which grant funds were provided. Associate projects names to any subrecipient or subaward associated with grant, approved grant funds, and expenditures to date.

6a. Architectural and engineering fees	\$1,497,435.46	\$1,244,839.96	\$2,742,275.42	\$1,497,435.45	\$1,244,839.96	\$2,742,275.41	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	\$184,566.87	\$153,433.13	\$338,000.00	\$184,566.87	\$153,433.13	\$338,000.00	100%
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	\$16,741,604.56	\$14,372,046.47	\$31,113,651.03	\$16,741,604.56	\$14,372,046.47	\$31,113,651.03	100%
6a. Equipment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Miscellaneous	\$0.00	\$3,088,800.00	\$3,088,800.00	\$0.00	\$3,088,800.00	\$3,088,800.00	N/A
6a. Subtotal	\$21,092,259.41	\$21,092,259.40	\$42,184,518.81	\$20,542,259.40	\$20,653,203.29	\$41,195,462.69	97%
6a. Contingencies	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	N/A
6a. Totals	\$21,092,259.41	\$21,092,259.40	\$42,184,518.81	\$20,542,259.40	\$20,653,203.29	\$41,195,462.69	97%

E. COMMUNITY BENEFIT AGREEMENT

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

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

Description of Community Agreement

- 7a. Community Benefit Group Name: Please provide the name of the Community Benefit Group
- 7b. Developer Name: Please provide the name of the Developer.
- 7c. Community Benefit Group and Developer Partnership: Please describe in the space below the nature of the partnership and how the MM grant funds being used are assisting to provide community support for the infrastructure project.

These questions were answered via file upload.
Number of Community Agreements: 0
File(s) Uploaded with Responses: 10.20.25 bi-annual Community Benefit Agreement.xlsx

F. CLIMATE RESILIENCE

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

Climate Resiliency Risk Mitigation

- This purpose of this section is for the recipient to demonstrate that they have sufficiently accounted for current and future weather and climate-related risks to new MM infrastructure projects. In particular, each recipient should demonstrate how they've addressed the known and identifiable risks of current and future projected weather and climate conditions through measures such as (but not limited to) choice of a technology platform suitable to the climate risk of the region, reliance on alternatives siting of facilities (i.e., underground construction where appropriate), retrofitting, or hardening of existing assets, and use of network redundancy to safeguard against threats to infrastructure.
- 8a. Were any geographic areas identified for this reporting period subject to an initial and/or updated hazard screening for future weather and climate related risk? If so, please provide the date of the screening and provide related documentation as an attachment to this report.

No			
8b. Climate Resilience Category	8c. Date of Most Recent Hazard Screening	8d. Name and Title of Representative Completing Most Recent Hazard Screening	8e. Date of Report Completion
Files Uploaded for Hazard Screening Information: 10.30.25 bi-annual Climate Resilience.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)?			
At this time Zayo sees no major foreseeable climate events from the climate data in/around/near for the route. Potential risk identified includes Earthquakes and wildfires. In the next 20 years, this route may have the following risks: 1. Flooding Hazard, 2. Wildfire Hazard, 3. Earthquake Hazard, and 4. Hail, Wind, and Tornado Hazards. What may change is the frequency of these events due to global warming and changing weather patterns. As a result, Zayo has implemented standard operating procedures to avoid/or mitigate these risks including a continuous improvement program ensuring Zayo is implementing the best contingency plans to adapt to any changes.			
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 Zayo's Network Operations Center (NOC) monitors all weather events in and around Zayo infrastructure utilizing the latest NOAA/National Weather Service Live update feeds. Zayo also utilizes GE Smallworld interactive maps/tools for all of the owned infrastructure.			
8h. Risks to Deployment of New Infrastructure: Has the team identified any risks impacting the deployment of new or repaired infrastructure due to current and future weather and climate-related threats during this reporting period?			

No
8i. Risk Mitigation: How will the project avoid and/or mitigate the risk identified? If not applicable, please explain why.
<p>Zayo's NOC (Network Operations Center) in Tulsa, OK, assists our Outside Plant (OSP) Teams, contractors and vendors throughout the construction phases by identifying and highlighting any potential climate events that could potentially affect the project. Additionally, Zayo monitors its network to identify repeating occurrences such as outages on the network. Zayo also uses big data with AI technology for trend analysis to recognize location(s) repeatedly on system outage tickets.</p> <p>Additionally, Zayo has Standard Operating Procedures (SOPs) that mitigate all weather and climate risks including those already identified. The SOPs include: 1. Bury the majority of the fiber. Buried fiber is the best protection against any severe climate event, particularly those identified as weather and climate risks along this route. More than 98% of the fiber is buried at a design specification of three feet. 2. Deploy high-density polyethylene (HDPE) conduit. Zayo’s design includes use of HDPE conduit which protects fiber from chemical erosion and provides protection from primary and secondary climate risks (floods, fires, winds, severe weather, and earthquakes). 3. Deploy hardened above ground telecom shelters with back-up power. Zayo’s hardened above ground infrastructure shelters consist of precast, lightweight reinforced concrete enclosures that are fire resistant, as well as insulated from extreme temperatures. The shelters are designed with onsite power sources and back-up power. Each shelter is designed with four-hour battery backup and 24-hour generator back-up. Investment in an environmental study. Zayo has also invested in and completed an environmental study which optimized the route against climate hazards protections (designing the safest route path) verified by 3rd party engineering firms. By investing in and completing an environmental study Zayo is able to avoid potential weather- and climate-related risks through the intentional path of the route.</p>
8j. Additional Information: Is there any additional information you would like to share during this reporting period that the grant team should be aware of regarding the management of sustainable climate resiliency for your MM project?
No additional information to share.
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
<p>Yes</p> <p>2018 National Climate Assessment NOAA's 2022 State Climate Summaries NOAA Disaster and Risk Mapping Tool NOAA's Storms Event Database</p>

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, Ethnicity and Sex	Number of Hires				
	Race/Ethnicity				
	9b. Hispanic or Latino	9c. Non-Hispanic/Non-Latino			Totals
		9c-1. Men	9c-2. Women		

	9b-1. Men	9b-2. Wome n		White	Black or African America n	Native Hawaii an or Pacific Islande r	Asian	Native Americ an or Alaska Native	Two or More Races	White	Black or African America n	Native Hawaii an or Pacific Islander	Asian	Native America n or Alaska Native	Two or More Races							
Number of Local Direct Hires	0	0		0	0	0	0	0	0	0	0	0	0	0	0							0
Number of Non-Local Direct Hires	1	1		17	0	0	0	0	0	10	0	0	0	0	0							29
Percentage of Local Direct Hires on Award	0%	0%		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%							
Number of Local Subcontract ors	7	3		38	2	0	4	0	9	28	3	0	2	0	5							101
Number of Non-Local Subcontract ors	32	3		64	2	0	3	2	32	7	0	0	0	0	1							146
Percentage of Local Subcontract ors on Award	18%	50%		37%	50%	0%	57%	0%	22%	80%	100%	0%	100%	0%	83%							

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).	LCP Tracker Certified Payroll reports. During this reporting period, prevailing wage was paid to contractors however certifications were not approved until after this reporting period.
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).	LCP Tracker Certified Payroll reports. During this reporting period, prevailing wage was paid to contractors however certifications were not approved until after this reporting period.
10e. If you answered "No" to either 10a. or 10c., please provide an attachment reporting the wages and benefits of workers on the project by job classification, and whether those wages are less than the prevailing wage.	

Workforce Demographic Data	
Jobs by Race, Ethnicity and Sex	Number of Jobs
	Race/Ethnicity

Workforce Demographic Data																						
	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 America n	Native Hawaiia n or Pacific Islander	Asian	Native America n or Alaska Native	Two or More Races	White	Black or African Americ an	Native Hawaiian or Pacific Islander	Asian	Native America n or Alaska Native	Two or More Races							
Jobs Created	19	4		60	2	0	2	0	4	17	2	0	1	0	0							111
Jobs Retained	21	3		59	2	2	5	2	37	28	1	0	1	0	6							167

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.

Zayo is committed to cultivating a high-performing and collaborative work environment where all employees are supported in achieving their professional goals. Our success begins with the active involvement of our Board of Directors and leadership team, who ensure our workforce strategies align with the company's long-term goals.

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

Zayo offers an internship program designed to develop local talent in alignment with our business needs. We conduct regular in-house training and support employees in pursuing professional certifications relevant to their roles. Our tuition reimbursement program allows employees to choose additional training, certifications, or college coursework to enhance their expertise and career development. Zayo also engages with local organizations and workforce development partners to attract and retain highly qualified candidates who can contribute to our future growth.

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

Internship Programs
In-House Training
Professional Certifications
Workforce Partnerships

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.

"Zayo maintains a Code of Conduct, Employee Handbook, and an Outside Plant Manual that every contractor and subcontractor is required to follow which includes specific safety and wage requirements under these statues. These manuals detail equal employment opportunity requirements, pay scales, overtime eligibility, employee benefits, and worker safety requirements. Also, the Code of Conduct explicitly states that Zayo retains the right to monitor and ensure compliance with each contractor and subcontractor. Zayo considers occupational health and safety to be of primary importance. Zayo is committed to providing a safe and healthy work environment for employees, customers, contractors and visitors. All the Master Construction Services Agreements with construction contractors require them to comply with our OSP Manual, Code of Conduct, and Safety Requirements and all employment and safety laws. We ensure a safe work environment by effective administration, education and training in compliance with legal requirements and industry standards concerning workplace safety. Each employee is expected to obey safety rules and to exercise caution in all work activities. Employees must immediately report any unsafe condition to their immediate manager. For ongoing

<p>maintenance, our local team of field operations professionals work hand in hand with local groups.</p> <p>All Zayo contractors must comply with all applicable laws and regulations regarding, among other things, environmental matters, occupational health and safety, labor and employment practices, human rights, immigration, anti-corruption, privacy protection, product safety, shipping and product labeling. Each contractor must provide employees with all safety equipment required by OSHA, Zayo, and the various governing agencies."</p>
<p>13c. Please describe below the steps to ensure a safe and healthy workplace that avoids delays and costs associated with workplace illnesses, injuries, and fatalities.</p>
<p>All protection equipment will satisfy the appropriate OSHA, ANSI, and/or MIOSH standards. All personnel working on-site will be certified as having completed a course in safety training. OSHA regulations require that precautions be observed to avoid cave-ins when digging boring pits and trenches, especially under wet soil conditions. This is a matter of law and safety. All contractors are required to abide by applicable regulations of the OSHA Act of 1970 and any subsequent revisions. Each contractor must provide employees with all safety equipment required by OSHA, Zayo, and the various governing agencies. Questions regarding compliance with the various regulating agencies will be the responsibility of the Safety Director of each contact company.</p>
<p>13d. For your MM project, please provide a brief description below of efforts made to ensure a safe and healthy workplace.</p>
<p>Safety Training - All protection equipment will satisfy the appropriate OSHA, ANSI, and/or MIOSH standards. All personnel working on-site will be certified as having completed a course in safety training. OSHA regulations require that precautions be observed to avoid cave-ins when digging boring pits and trenches, especially under wet soil conditions. This is a matter of law and safety. All contractors are required to abide by applicable regulations of the OSHA Act of 1970 and any subsequent revisions. Each contractor must provide employees with all safety equipment required by OSHA, Zayo, and the various governing agencies. Questions regarding compliance with the various regulating agencies will be the responsibility of the Safety Director of each contact company.</p> <p>Certifications - Contractors involved with the Middle Mile job includes: Plant Workers, Plant Engineers, Fiber Splicers, traffic controllers, and site supervisors. After awarding the work, Zayo can support further information on size of workforce selected, entity selected, and information on professional certification to ensure work is done on high standard. Any contractor must be trained in compliance with the before mentioned local, state, and federal regulations. The latest editions of the following codes and regulations define the minimum safety and construction standards required by Zayo: National Electrical Safety Code (NESC), National Electrical Manufacturers Association (NEMA), Code of Federal Regulations, Title 29, Occupational Safety and Health Standards (OSHA), National Electrical Code (NPFA No. 70), Underwriters Laboratories, Inc., Lightning Protection Code (ANSI-5.1), Applicable Local, State, and County Ordinances, Applicable Safety Codes Required from Right-Of Way Vendors (e.g., Highway, DOT, Railroad, etc.), RBOC and other operating companies Regulations and Requirements</p> <p>Workforce committes and resolutions - There have been no issues or concerns rasied during this reporting period.</p>
<p>Has the team offered any of the following resources to assist with maintaining a safe and healthy workplace for this reporting period? If so, which resources (please provide a brief description of any of the following that apply): 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</p>
<p>Safety Training Certifications Workforce Comittees</p>

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
Stantec	Active	109	Environment Assessment, Permitting, Inspection & Monitoring
e-Copernicus	Active	3	Project Management
Vertical Bridge	Active	6	Sub-recipient (Towers) - Vertical Bridge was mistakenly added as a subcontractor, unable to delete from this section
Robins Brothers Construction	Active	136	Construction Vendor
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.			
To ensure an appropriately skilled workforce, qualified vendors must participate in Zayo’s strict procurement selection process that includes multiple rounds of written and verbal evaluation. For this project we have selected Robins Construction company who is currently employing majority works from local and regional labor markets. Zayo uses LCP Tracker, a certified payroll compliance tool commonly used among States and Municipalities, to capture vendor wage, job classification, prevailing wages and fringe benefit information. The Zayo OSP team approves the certified payrolls based on their knowledge of the project.			

I. ANCHOR INSTITUTIONS	
Please provide Anchor Institution (AI) data for the current period only (not cumulative). Please add rows as needed.	
14a. Anchor Institution Name	These questions were answered via file upload. File Uploaded with Responses: 10.30.25 bi-annual Anchor Institutions.xlsx
14b. Street Address	
14c. City	
14d. State	

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	193					
16b. Total of fiber miles leased	0	0	0	429	429					

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?	Buried	buried	Buried	Buried	Buried					
17a-2. Number of strands deployed	0	0	0	12	432					
17a-3. Number of miles of buried fiber deployed	0	0	0	0	193					
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-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)	Fiber Deployment Cost includes all cost from the construction cost category									
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: VerticalBridge_UMA_REN_121025.kmz									

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-10. Please provide the digital mappings (e.g., CAD, Revit, KMZ, KML) for the microwave nodes created during this reporting period.	
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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	NA	N/A	NA					
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)	None to Report									

17c-5. Please provide the digital mappings (e.g., CAD, Revit, KMZ, KML) for the satellite network accessed during this reporting period.	
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Certifications
18. Please provide certification evidencing compliance with Federal labor and employment laws along with the requirements of Infrastructure Investment and Jobs Act and Middle Mile Grant Program, for the bi-annual period for which this report is being filed.
"I certify that Zayo Group, LLC is in compliance with Federal labor and employment laws along with the requirements of the Infrastructure Investment and Jobs Act and Middle Mile Grant Program, for the biannual period for which this report is being filed. "
19. Please provide certification evidencing compliance with the Build America, Buy America Act. The Build America, Buy America Act requires that all of the iron, steel, manufactured products (including but not limited to fiber-optic communications facilities), and construction materials used in the project or other eligible activities are produced in the United States unless a waiver is granted.
Not Applicable
File Uploaded: _UPR Inventory Report 10.30.25.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:	Mayank Goel
20b. Signature of Certifying Official:	Mayank Goel
20c. Telephone (area code, number and extension):	7206712992
20d. Email Address:	mayank.goel@zayo.com
20e. Date:	12/15/2025