Grant Request Number	GRN-001414
Funding Program Name	Middle Mile Broadband Infrastructure Grant Program
Funding Request Name	County of Cumberland - Middle Mile - GRN-001414
Applying Organization	County of Cumberland
Applicant Name	Jeffrey Ridgway

Primary Applicant Type

Identify the primary applicant type:

Single Entity

———

Primary Entity Type

Type of entity: Primary entity type, (A) a State, political subdivision of a State, Tribal government, technology company, electric utility, utility cooperative, public utility district, telecommunications company, telecommunications cooperative, nonprofit foundation, nonprofit corporation, nonprofit institution, nonprofit association, regional planning council, Native entity, or economic development authority; or (B) a partnership of two (2) or more entities described in (A).

What is the primary applicant's entity type?

Political subdivision of a state

———

Is parent/owner of applicant a foreign entity?

No

———

Managerial Capability

Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.

Key Personnel - Carolyn Zumpino; Triad Associates; Grant Administration;

[redacted]

KeyPersonnel_Resume_Carolyn_Zumpino

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Managerial Capability

Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.

Key Personnel - David Stern; V-COMM; Engineering; [redacted]
KeyPersonnel_Resume_David_Stern

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Managerial Capability

Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.

Key Personnel - Dominic Villecco; V-COMM; Engineering; [redacted]
KeyPersonnel_Resume_Dominic_Villecco

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Managerial Capability

Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.

Key Personnel - Donald Coover; V-COMM; Engineering; [redacted]
KeyPersonnel_Resume_Donald_Coover

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Managerial Capability

Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.

Key Personnel - Doug Albrecht; County of Cumberland; AOR; [redacted]
KeyPersonnel_Resume_Doug_Albrecht

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Managerial Capability

Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.

Key Personnel - Jake Botticello; Triad Associates; Grant Administration;
[redacted]
KeyPersonnel_Resume_Jake_Botticello
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Managerial Capability

Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.

Key Personnel - James Shelton; V-COMM; Engineering; [redacted]
KeyPersonnel_Resume_James_Shelton
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Managerial Capability

Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.

Key Personnel - Jeffrey Ridgway; County of Cumberland; Financial Contact;
[redacted]
KeyPersonnel_Resume_Jeffrey_Ridgway
———
Managerial Capability

Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.

Key Personnel - Jerry Velazquez; Cumberland County Improvement Authority; Project Manager;
[redacted]
KeyPersonnel_Resume_Jerry_Velazquez
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Managerial Capability

Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.

Key Personnel - Jody Hirata; County of Cumberland; Deputy County Administrator;
[redacted]
KeyPersonnel_Resume_Jody_Hirata

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Managerial Capability

Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.

Key Personnel - Michael Webster; V-COMM; Engineering; [redacted]
KeyPersonnel_Resume_Michael_Webster

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Managerial Capability

Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.

Key Personnel - Ryan Feaster; Cumberland County Improvement Authority; Construction Manager;
[redacted]
KeyPersonnel_Resume_Ryan_Feaster

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Managerial Capability

Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.

Key Personnel - Scott Armato; Triad Associates; Grant Administration; [redacted]
KeyPersonnel_Resume_Scott_Armato

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Managerial Capability

Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.

Key Personnel - Stanley Field; County of Cumberland; Chief Technology Officer;

[redacted]

KeyPersonnel_Resume_Stanley_Field

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Managerial Capability

Applicants shall submit to the Assistant Secretary one-page resumes for (a) all key management personnel and (b) all key personnel of subcontractors or other entities that will play substantial roles in building, managing, or operating the middle mile network built using Middle Mile Grant (MMG) Program funding.

Key Personnel - Tammy Wetzel; Triad Associates; Grant Administration;

[redacted]

KeyPersonnel_Resume_Tammy_Wetzel

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Organizational Charts

Each applicant shall submit any necessary organizational chart(s) detailing all of its parent companies, subsidiaries, and affiliates.
This upload section should also be used for any letters of support from the organizations that will be involved in the project as a community stakeholder.

LOS Middle Mile Grant Program - Cumberland Co-09-29-2022 03-50-County of Cumberland-GRN-001414..pdf, Fairfield Twp-09-29-2022 03-50-County of Cumberland-GRN-001414..pdf, Congressman Van Drew LoS - NTIA Cumberland-Sa-09-29-2022 03-59-County of Cumberland-GRN-001414.pdf, CumberlandCounty_MiddleMile_ApplicationLetter-09-29-2022 03-52-County of Cumberland-GRN-001414.pdf, Project Organizational Chart-04-10-2023 07-38-County of Cumberland-GRN-001414.pdf, Project Organizational Chart-04-10-2023 09-52-County of Cumberland-GRN-001414.pdf

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Organizational Details

Each applicant must also provide a narrative describing the applicant's readiness to manage a middle mile broadband network. This narrative should describe the experience and qualifications of key management set to undertake this project, the applicant's experience undertaking projects of similar

size and scope, recent and upcoming organizational changes including mergers and acquisitions, relevant organizational policies, and ownership information consistent with 47 CFR § 1.2112.

This narrative shall denote who will own the assets at the end of award period. This response is limited to 6000 characters as an open field narrative.

As lead applicant, the County of Cumberland has a long history of successfully managing large construction projects and overseeing the equitable distribution of services to its 154,152 residents. The County provides services in Aging and Disability, Consumer Affairs, Homeless and At Risk Services, Alcohol and Substance Abuse Services, Recovery Support, Veterans' Services, Mental Health, Mosquito Mitigation, Jail Inmate Services, as well as numerous other Social Services. In addition, the County has successfully supervised various projects funded through public monies.

Jeff Ridgeway, Jr., CPA, RMA, Chief Financial Officer/County Treasurer at Cumberland County, has over a decade of experience in accounting, having spent five years as Senior Accountant at Petroni & Associates LLC of Glassboro, NJ. At Cumberland County, Mr. Ridgeway performs all statutory responsibilities, including but not limited to preparation of the annual financial statement, audit schedules, Single Audit schedules, annual and supplementary debt statements, and annual budget (approximately $200 million inclusive of grants).

Stanley Field, Chief Information Security Officer and Director of Information Technology at Cumberland County, has nearly thirty years of experience in information technology, having spent twenty-six years with the New Jersey State Police, eventually working his way to Captain and the Bureau Chief of the High Technology Crimes Bureau. At Cumberland County, Mr. Field actively represents Cumberland County in all matters pertaining to information security and spearheaded Cumberland County's 700mhz Radio Project.

As the project manager, the Cumberland County Improvement Authority ("The Authority") has extensive experience in overseeing public and private infrastructure and building projects. Since its creation in 2014, The Authority's work has resulted in an estimated 4,389 jobs; 580 of which are new, full-time positions. With an operating budget of $35 million, over time, The Authority has leveraged their investment of $337,953,128 dollars into generating more than $700,000,000 in economic impacts. The Authority owns and operates over 750,000 square feet of office, warehouse, and manufacturing space. The organization has established an exceptional track record regarding contact compliance, delivering projects that are both on time and within established budgetary constraints. The Authority is responsible for the implementation of $100 million in projects annually.

President and CEO of The Authority, Gerard Velázquez, has over 30 years of public and private development experience, leading all development and redevelopment initiatives and coordinating the overall economic development strategy for Cumberland County. With extensive practical experience in community redevelopment and business attraction and in leveraging financial and technical resources

to revitalize communities, he leads a team with more than 100 years of collective construction management expertise.

Ryan Feaster, Senior Vice President of Construction Management, has been with Cumberland County for 24 years and with the Improvement Authority for 8 years. He currently serves as a Senior Vice President of Construction Management specializing in technology infrastructure, furnishings, and specialty equipment.

V-COMM, the multi-disciplinary telecommunications engineering firm engaged in the design and execution of this project, was founded in 1996 by Dominic Villecco and David Stern. Currently, the organization's executive leadership has more than 75 years' combined experience in engineering, followed by a group of professional, certified employees. V COMM has numerous past and present clients across multiple industries including Carrier, Government, Transportation, Enterprise, Education, and Healthcare.

Dominic Villecco is a veteran and leader in the telecommunications industry, with more than 40 years' experience. He founded V-COMM, a top engineering consulting firm in the Northeast, in 1996, after working as the Vice President of Comcast Cellular Communications for almost a decade. Mr. Villecco is a recognized expert in wireless systems, design, implementation and operation for the FCC.

David Stern is a 34-year veteran and leader in the telecommunications industry. He co-founded V-COMM, a top engineering consulting firm in the northeast, in 1996 after working for both Comcast Cellular and Motorola Solutions. Mr. Stern is a recognized expert in all wireless transmission formats and wireless data technologies.

Michael Webster has been part of V-COMM's engineering team for more than a decade, using his engineering expertise to lead in the design and testing of systems. Mr. Webster has aided in the system design and development of a multitude of projects.

James Shelton has more than 30 years' experience in wireless engineering. He has extensive experience in wireless system design, implementation, testing and optimization for wireless systems utilizing APCO 16, APCO 25, ECADS™, SMARTNET™, 5G LTE, OFDM, CDMA, EVDO, TDMA, GSM and AMPS wireless technologies.

Donald Coover is a 39-year veteran of the telecommunications industry and a member of the Association of Public Safety Officials – International, Inc. (APCO). Mr. Coover holds an FCC General Radio-Telephone license and is versed in various RF, transport and switching technologies.

As grant administrator, Triad Associates has 44 years of experience in developing public and private partnerships and coordinating project funding and implementation. Since 1978, Triad Associates has successfully secured over $1.3 billion in funding on behalf of both public and private sector clients.

At the end of the award period, the assets will be owned by their respective Counties.

47 CFR 1.1.2112 does not apply as there is no transfer of control. The County will control the property discussed before and after the donation to this project has taken place.

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Form CD-511 (Certification Regarding Lobbying)

The applicant must upload a completed form that certifies that Federal funds have not and will not be used for lobbying in connection with this request for Federal financial assistance. A fillable Form CD-511 can be found in the MMG ZIP folder.

CD-511-09-29-2022 11-07-County of Cumberland-GRN-001414.pdf, 511-04-06-2023 10-40-County of Cumberland-GRN-001414.pdf, LLL-04-06-2023 10-38-County of Cumberland-GRN-001414.pdf

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Standard Form-LLL (Disclosure of Lobbying Activities)

Standard Form-LLL must be completed and submitted for those applicants that need to disclose lobbying activities that have been secured to influence the outcome of a Federal action. A fillable Form SF-LLL can be found in the MMG ZIP folder.

SF-LLL-09-29-2022 11-07-County of Cumberland-GRN-001414.pdf, LLL-04-06-2023 10-39-County of Cumberland-GRN-001414.pdf

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SAM.gov Registration

Applicants are asked to upload a screenshot of their SAM.gov registration.

EntityInformation-20220923-110513-09-23-2022 11-05-County of Cumberland-GRN-001414.pdf, EntityInformation-20230411-104839-04-11-2023 11-01-County of Cumberland-GRN-001414.pdf

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Executive Summary

Please describe how the applicant's proposal will advance the objectives of the MMG Program, as well as the specific objectives of outlined in the Notice of Funding Opportunity (NOFO);

An overview of the proposed route or service area(s), including information regarding rurality and socio-economic indicators in the area to be served by the proposed project.
This response is limited to 12000 characters as an open field narrative.

Cumberland County, New Jersey, is seeking $24,176,692 from the Middle Mile Grant (MMG) Program from the National Telecommunications and Information Administration (NTIA) of the United States Department of Commerce to create an interconnecting series of middle-mile rings, servicing

Cumberland and adjacent Salem County, New Jersey. This application is being facilitated by the Cumberland County Improvement Authority ("The Authority") with Salem County a partner in its development.

This project represents a unique partnership between two neighboring counties in southern New Jersey: Cumberland and Salem Counties. These two counties have long had a strong working relationship; however, this project marks a genuine step forward in collaboration between the two Counties.

Throughout the two-County region, there are significant swaths of the area which feature underserved and unserved residents living with incredibly slow internet access or with no Broadband access at all. As with many unserved or underserved populations, these pockets tend to be somewhat sparsely populated with high levels of low- or moderate-income residents.

Within this region, there are significant national assets which require greater access to broadband connectivity. The Salem Nuclear Power Plant is a two-unit pressurized water reactor nuclear power plant located in Salem County. The New Jersey Wind Port, also in Salem County, is the nation's first purpose-built offshore wind marshaling port, providing marshalling space, heavy-lift wharfs and component laydown areas, and open access to the Atlantic Ocean. It is the only facility of its kind in the western hemisphere, and its operation is essential to supporting the nation's nascent wind industry and reducing our nation's reliance on fossil fuels.

Nominally, there are nine last-mile service providers throughout the project area: four satellite providers, two fixed-wireless providers, one fiber provider, one ADSL provider, and one cable provider. Of these, the four satellite providers, the ADSL provider, and the two fixed-wireless providers typically do not offer service at the 100 Mbps downstream /25 Mbps upstream speeds provided for by this program.

According to residents of the region, the two companies providing high-speed service generally provide sub-par, inconsistent, and unreliable internet services, backing them up with a lack of customer service and a lack of respect for their subscribers. Further, it is believed by residents throughout the project area that the two companies fail to compete for customers, instead choosing to allow the other company a monopoly on the service provided in a particular area, down a specific street, or even on opposing sides of the same street. It's been noted that, in areas where one major service provider has a stronghold, the other tends to scale back the locations they service. In response, the service provider with the established customer base charges higher prices than in areas with stronger competition.

The residents of this area are all too familiar with the lack of competition among high-speed internet service providers. For these residents, frustration is only one aspect of living with slow internet: their existence is impacted by their lack of access to reliable high-speed internet. As covered in more detail elsewhere in this application, the economic and educational attainment levels of the region are

incredibly low. These issues are difficult to overcome without access to reliable internet service; these residents' reduced opportunities for employment, difficulties in schooling, and struggles with healthcare are continually exacerbated by their lack of internet service. The inequity of service provided limits residents' success and access to upward mobility while creating obstacles to improving their standard of living, as the simple act of finding a new place to live now requires internet access.

Due to the lax rules governing the reporting of data, current FCC 477 maps vastly overstate the coverage in the region. As this data is provided by the last-mile internet service providers and they can claim service to an entire census block while only providing service to one address within, many unserved and underserved areas tend to be counted as being served. The partners in this project know from the public that the situation in Cumberland and Salem Counties is much worse than can be accurately documented through the current FCC reporting.

Based upon the 2010 Census urban definitions, most of this project is in rural areas. With large swaths of farmland and miles of forests, outside of the major urban areas the population in this region dwindles. The Vineland, NJ Urbanized Area 90730 is within the project area, as well as the Urban Clusters of Bridgeton, NJ 10189; Laurel Lake, NJ 48124; Salem, NJ 78175; and Woodstown, NJ 97183.

Generally, Cumberland and Salem Counties are among the poorest in the State of New Jersey. Further detailed in the Level of Need, the combined poverty rate throughout these Counties sits at 15.3%, far higher than New Jersey's 9.4%. In addition, Median Household Income (MHI) lags far behind the State of New Jersey, as well. While New Jersey's MHI is $85,245, the MHI in Cumberland County sits at $55,709 (65.4% of the State MHI) and Salem County at $64,234 (75.4% of the State MHI).

The educational attainment of the two Counties similarly lags behind the rest of the State, as well, with a combined rate of bachelor degree attainment sitting at 18.1%. These low educational attainment rates will be further impacted by the recent COVID-19 pandemic, as many students struggled with internet connectivity issues while schooled from home. With the middle-mile infrastructure in this proposal, should another pandemic happen, the educational impacts on our youngest students will be mitigated.

The two Counties have had ongoing conversations with numerous stakeholders throughout the development of this project, including the New Jersey Board of Public Utilities, which oversees the NTIA-funded State Broadband Office, and the New Jersey Office of Information Technology (OIT). There have been significant conversations with – and support for this project from – Senator Cory Booker and Congressman Jefferson Van Drew. In addition, residents of the two Counties have expressed strong support during the several public meetings held on the topic.

This project is expected to be completed, lit, and operating well less than the statutorily required five years. Currently, this project is expected be completed twenty-three (23) months and two (2) weeks after the grant agreement has been finalized and the funds have been obligated.

The partners in this project have a long history of successfully marshalling projects funded with public monies, as well as those with fair labor practice requirements. As project manager, the Cumberland County Improvement Authority ("The Authority") has extensive experience in successfully managing construction projects throughout the area. With almost 100 employees over a variety of disciplines, the construction management division at The Authority consists of six full-time construction managers and one part-time construction manager. As part of their employee base, 34 employees are dedicated to the facilities management team, and the organization maintains over 1 million square feet of academic, office, and warehouse space along with over 360 acres; the largest of which is the Rowan College of South Jersey Cumberland Campus at 385,000 square feet and 39 acres. Throughout their many projects, The Authority has coordinated multiple professionals during the planning and design stages and multiple trades for construction through a multi-prime bid process.

The Authority will lead the bidding and construction process, ensuring that this process is fair and open, conducted in accordance with Federal procurement regulations found in 2 CFR 200. Further, The Authority customarily includes fair labor language as part of their procedures for procuring bids. In the documents for the bid for this project, The Authority will include Equal Employment Opportunity language and Affirmative Action Compliance language as provided in N.J.S.A. 10:5-31 et seq. (P.L. 1975, C. 127) N.J.A.C. 17:27 et seq., as well as Americans with Disabilities Act mandatory language.

With the assistance of V-COMM, L.L.C., the engineer contracted for this project, the Counties have developed a plan to ensure all entities engaged in construction of the project are properly trained, certified, and licensed. The Authority will partner with the Cumberland County Center for Workforce and Economic Development (CCCWED) to ensure that organization will direct their activities to ensure that appropriate apprenticeships and other training programs are developed to create the appropriately trained workforce necessary to complete this project. They have a long history of working in collaboration, not only to ensure that County projects are properly staffed, but also that the initiatives spearheaded by The Authority will have appropriately staffed and credentialed workforces.

A thorough review of climate- and weather-related risks was conducted for this project. With the two Counties' location along the Delaware River and Delaware Bay, the greatest risk for the eventual middle-mile infrastructure is flooding; steps have been taken in this design to mitigate this possibility.

The fiber plant is planned to terminate in 24 new outdoor equipment shelters, most of which are on properties that already have County-owned communication facilities. The fiber huts have space planned for leasing to at least one carrier, and large-footprint equipment is not expected to be housed there. If a last-mile ISP provider would like to lease additional space, we are able to negotiate and make arrangements. As a large majority of this project is on existing rights-of-way and properties with existing facilities, it is not anticipated that any adverse environmental concerns would be encountered during deployment.

The ISP interconnection points are planned in Philadelphia and Wilmington colocation hotels/ datacenters. The fiber huts and fiber splice points in Salem and Cumberland Counties are for build-out of interconnected last-mile architecture.

The proposed middle-mile infrastructure will offer interconnection in perpetuity where technically feasible without exceeding current or reasonably anticipated capacity limitations on reasonable rates and terms to be negotiated with requesting parties. Such interconnection includes both the ability to connect to the public internet and physical interconnection for the exchange of traffic. Neutral traffic routing will be employed, with connections maintained without respect to carrier.

When complete, it is expected that this middle-mile infrastructure will not only provide service to the un- and underserved populations of Cumberland and Salem Counties, but it will also serve to increase competition among the areas of the Counties that have service, ultimately lowering the price to the end user. With the advent of this middle-mile infrastructure, it is expected that smaller broadband internet service providers will choose to enter the two-County market – as evidenced by the letter of commitment provided by the Vineland Municipal Electric Utility. These new actors can easily make their case for better service – both broadband internet service and customer service – to the difficult-to-service areas. With greater competition, the companies currently providing service can be expected to increase their level of service, providing more consistent delivery and increased customer service, as well as lower prices. The completion of this middle-mile network will allow real competition to take place in Cumberland and Salem Counties while providing much needed broadband internet service throughout the region.

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Level of Need

A description of the level of need in the proposed service area(s), including but not limited to communities considered unserved and/or underserved in the proposed service area(s), discussion of the competitive landscape in the area, variations among service areas if there are any, or the general economic conditions in the proposed funded service area.

This response is limited to 12000 characters as an open field narrative.

This shared service partnership seeks to provide a middle-mile infrastructure ring throughout two counties in southern New Jersey: Cumberland County and Salem County. Throughout these counties, there are substantial swaths of the region featuring underserved and unserved residents living with incredibly slow internet access or with no Broadband access at all. As with many unserved or underserved populations, these pockets tend to be somewhat sparsely populated with high levels of low- or moderate-income residents.

This project will advance both of the Middle Mile Grant program’s key objectives. By creating four

interlocking rings through the unserved and underserved areas in the two-county region, the project will “encourage the expansion and extension of middle mile infrastructure to reduce the cost of connecting unserved and underserved areas to the backbone of the internet.”

In addition, this new network has been designed by one of the top engineers in the field with an eye toward resiliency and will be installed professionally, and connects to two first-mile internet connections – one in Philadelphia and one in Delaware – providing redundant service. Built-in laterals and redundant node points further increase these redundancies, ensuring that, should outages happen, they will be minimized in scope. Further, the project engineers are building climate resilience into the design, and node points in existing structures are climate resistant. As such, this project is expected to “promote broadband connection resiliency through the creation of alternative network connection paths that can be designed to prevent single points of failure on a broadband network.”

The project engineers have devised a series of four interconnecting middle-mile rings measuring approximately 220 miles throughout the two-county region. The route of these rings has been devised to ensure connectivity to the unserved or underserved populations in the region. Beginning at its westernmost connection in Salem County, connecting to the submarine first-mile connection (“pigtail”) in Delaware, the northwestern ring runs north through Carneys Point Township, the Borough of Penns Grove, and into Oldmans Township before turning south into Mannington Township and north into Woodstown. The ring travels east through Upper Pittsgrove Township and the Borough of Elmer, moving south near the Township of Pittsgrove and turning west, connecting through Upper Deerfield Township, the Township of Quinton, and the City of Salem. The southeastern ring begins at its westernmost point in the Township of Shiloh, travels east through the Township of Hopewell and the City of Bridgeton, then turns southeast, connecting the City of Millville before turning south to Maurice River Township. The ring then turns northwest, connecting the Townships of Downe, Lawrence, and Fairfield before turning westward to connect the Township of Greenwich. There are two spurs into the southwestern-most reaches of Cumberland County along the Delaware Bayshore, connecting some of the most underserved populations in the region. The ring then turns toward the northeast to reconnect in Shiloh. A middle connecting ring has a lower arm connecting Lower Alloways Creek Township to Shiloh and an upper arm connecting Pittsgrove through the Census Designated Place of Alliance before turning south and meeting the southeastern ring in the Township of Deerfield. An additional, smaller ring begins in Deerfield and moves east, then north into the center of the City of Vineland before turning east, then south through Vineland and into the City of Millville, continuing south and reconnecting with the southeast ring. This ring will connect with the “pigtail” at Route 55 in Vineland.

While the rings measure approximately 220 miles, this project budgets for 250 miles of fiber. This difference is due to fiber overages allotted for the two river crossings, slack in each hut and splice box, and to allow for the sag of the fiber between each pole. Total overage was estimated between 10%-11% bringing the total fiber budgeted to 1,335,000 feet, or approximately 253 miles. We believe ample fiber slack is allotted in our estimated lengths.

It should be noted that all anchor institutions within 1,000 feet of the proposed infrastructure are in served areas.

While definitions of the 2020 Census's urban areas have not yet been defined, based upon the 2010 definitions, most of this project is in rural areas. With large swaths of farmland and miles of forests, outside of the major urban areas, the population in this region dwindles. The Vineland, NJ Urbanized Area 90730 is within the project area, as well as the Urban Clusters of Bridgeton, NJ 10189; Laurel Lake, NJ 48124; Salem, NJ 78175; and Woodstown, NJ 97183.

Cumberland and Salem Counties are typically considered to be the poorest counties in one of the richest states in the Union.

According to the 2020 Census, the combined population of the two counties is 218,989, with 154,152 residents in Cumberland County and 64,837 residents in Salem County. This is an area with extraordinary poverty: while New Jersey's poverty rate sits at 9.4%, Cumberland County has a poverty rate of 14.4% and Salem County a rate of 13.0%. Calculated together, the poverty rate in the two-county region is 15.3%. In addition, Median Household Income (MHI) lags far behind the State of New Jersey, as well. While New Jersey's MHI is $85,245, the MHI in Cumberland County sits at $55,709 (65.4% of the State MHI) and Salem County at $64,234 (75.4% of the State MHI).

The region's educational attainment similarly lags behind the rest of the State. In the population of New Jersey over 25 years old, 40.7% of residents have achieved a bachelor's degree or higher. These numbers are considerably lower in the project area, with Salem County's rate an abysmal 21.7% and Cumberland County's even lower at 16.6%. Combined, the two-county region has a bachelor's degree attainment rate of 18.1%. These low educational attainment rates are expected to be further impacted by the recent COVID-19 pandemic, as many students struggled with internet connectivity issues while they were schooled from home. With the middle-mile infrastructure in this proposal, should another pandemic happen, the educational impacts on our youngest students will be mitigated.

This is an incredibly racially diverse region, as well, particularly within Cumberland County. For example, New Jersey's White Alone, Not Hispanic population sits at 53.5% of the population, whereas Cumberland County's rate is considerably lower at 44.3%. New Jersey's percentage of the population claiming Black Alone sits at 15.3%, while Cumberland County's rate is 22.4% and the two-county region's rate is 20.3%. These underserved populations are among the most impacted by the lack of competition between the current internet service providers in the two-county region. The development of the proposed network will promote equitable access to Broadband internet connection across these populations, while simultaneously providing this access at an affordable cost to these residents.

When examining the faulty FCC 477 mapping data, there are a total of 806 underserved and unserved

census blocks, representing a population of 7,039 residents. The vast majority of these census blocks are unpopulated farmland or forest; however, there is, nonetheless, a very large percentage of the area without sufficient, reliable internet service.

For the residents of these areas, frustration is only one aspect of living with slow internet: their existence is immeasurably impacted by their lack of access to reliable high-speed internet access. As highlighted previously, the economic and educational attainment levels of the two-county region are incredibly low. These issues are difficult to overcome without access to reliable internet service; these residents' reduced opportunities for employment, difficulties in schooling, and struggles with healthcare are continually exacerbated by their lack of internet service. The inequity of service provided to these residents limits residents' success and access to upward mobility while creating obstacles to improving their standard of living, including but not limited to the simple act of finding a new place to live now requires internet access.

Due to the outdated and unreliable rules governing the reporting of data, current FCC 477 maps vastly overstate the coverage in the two-county region. As this data is provided by the last-mile internet service providers themselves, and they can claim service to an entire census block while only providing service to one address within, many unserved and underserved areas tend to be counted as being served. The partners in this project know from numerous discussions with the public that the situation in Cumberland and Salem Counties is much worse than can be accurately documented through the current system.

Additionally, residents and business owners in this community are all too familiar with the lack of competition among potential and actual high-speed internet service providers, due to the fact that only a handful of companies provide last-mile service to area residents. According to the rosy picture painted by the FCC data, there are a number of last-mile service providers who claim service in the area: in the better served areas, there are up to nine providers while there may only be three providers in some of the areas farther afield, and these companies do not provide service at speeds which satisfy the conditions of this program.

However, in practice, residents' choices for providers are much more limited. Even in some of the areas with the most choice in service providers according to the FCC data, in practice, individual households really only have one choice for provider. This allows the companies with service in the area to provide sub-par, inconsistent, and unreliable broadband internet services, knowing that residents in the region have nowhere else to turn to gain access to the internet. However, as residents in the two-county region will attest, the providers who claim service throughout the area will fail to compete for subscribers in an almost concerted fashion.

It is expected that the introduction of this middle-mile infrastructure will foster competition among Broadband providers, enhancing access, increasing connectivity, and reducing costs throughout the region. As will be discussed elsewhere in this application, the Vineland Municipal Electric Utility –

currently operating the only municipal-run electric utility in the State of New Jersey – has committed their intent in entering the market as a last-mile internet service provider.

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State Collaboration Acknowledgement

NTIA strongly encourages prospective non-state applicants to coordinate and consult with the State Broadband Office or other coordinating body located in the jurisdiction in which the eligible entity proposes to deploy middle mile infrastructure to ensure that the proposal is consistent with the state's broadband plan and priorities. Please confirm collaboration and consultation.

Do you confirm collaboration and consultation with the appropriate organization?

Yes

———

State and Local Collaboration Narrative

Please provide information on the applicant's coordination with applicable State, Territory, Tribal, and local governments, including their awareness of the proposed project and any potential impact to respective service areas; and

Information regarding the applicant's involvement and coordination with community organizations or other relevant partners in the proposed service area.

This response is limited to 6000 characters as an open field narrative.

This project represents a unique shared service partnership between two neighboring counties in southern New Jersey: Cumberland and Salem Counties. These two counties have long had a strong working relationship; however, this project marks a genuine step forward in collaboration between the two Counties. Working together, the Counties' plan of bringing low-cost, high-speed Broadband access to their residents will be realized.

Throughout the development of this project, the two counties have had significant conversations with numerous stakeholders throughout the local area and on the State level.

The partners in this project have had ongoing and fruitful conversations with the New Jersey Board of Public Utilities (BPU), which oversees the NTIA-funded State Broadband Office, and the New Jersey Office of Information Technology (OIT). Throughout the development of this project, the project partners have remained in relatively constant contact with the appropriate State offices, enlisting the BPU for assistance in mapping and other technical support, as well as seeking guidance on the development of the project, specifically with Joseph Rivera, Head of the State Broadband Office at the NJ BPU.

The partners in this project have been in discussion with Senator Cory Booker's office as well as Congressman Jefferson Van Drew's office, as evidenced by their letters of support. Both legislators have been incredibly supportive of this project and have been particularly engaged with the leadership among the Counties.

This project has garnered strong support among the residents of the two Counties. Public meetings regarding the project were held in both Counties, with the public duly notified. Those in attendance were generally positive about the project. A presentation on this project was given at meetings of the respective Counties' Board of Commissioners, primarily to ensure that these essential leaders were fully apprised of the intent of the project, the timing, and the eventual cost share that will fall to the Counties. As these meetings are open to members of the public, many of them have since reached out with questions, recommendations, and support.

The City of Vineland in Cumberland County has been particularly engaged with this project from its inception. For the past several years, the City has been developing a network of City-provided middle- and last-mile Broadband infrastructure. Home to the only municipal electric company in the State of New Jersey, Vineland Municipal Electric Utility (VMEU) currently has the experience, capacity, capability, and infrastructure to provide these services throughout the City of Vineland. With the VMEU's over 100 years in business, extending this service throughout the two-County region will be an undertaking well within their organizational and financial capacity.

Further, the partners in this project have been in contact with the mayors of the various municipalities within the two counties. In addition to the mayors of the larger cities of Vineland, Millville, Bridgeton, and Salem, the leadership of all of the municipalities within the two Counties are supported, as are evidenced by the included letters of support.

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Will the project connect middle mile infrastructure to last mile networks that provide or plan to provide broadband service to households in unserved areas?

Yes

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Is the project connecting non-contiguous trust lands?

No

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Do you commit to offering wholesale broadband service at reasonable rates on a carrier-neutral basis?

Yes

———

The eligible entity adopts fiscally sustainable middle mile strategies. This strategy should be described in the Budget Narrative.

Do you attest to this?

Yes

———

The eligible entity commits to offering non-discriminatory interconnect to terrestrial and wireless last mile broadband providers and any other party making a bona fide request. This policy will be described in the Interconnect Policy.

Do you attest to this?

Yes

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The eligible entity identifies specific terrestrial and wireless last mile broadband providers that have(i) expressed written interest in interconnecting with middle mile infrastructure planned to be deployed by the eligible entity; and ii) demonstrated sustainable business plans or adequate funding sources with respect to such interconnection. This may be demonstrated in the Level of Need narrative of the Exec Summary.

Do you attest to this?

Yes

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The eligible entity has identified supplemental investments or in-kind support (such as waived franchise or permitting fees) that will accelerate the completion of the planned project. Such acceleration may be described in the Project Timeline narrative.

Do you attest to this?

Yes

———

The eligible entity has demonstrated that the middle mile infrastructure will benefit national security interests of the United States and the Department of Defense. The benefits may be explained in the Benefitting National Security Interests Narrative.

Do you attest to this?

Yes

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Please describe:

This project is intended to connect to all major network assets, including the two-county region's E911 and public safety radio towers, throughout the project area. The E911 system provides dispatchers not only with a voice connection with incoming calls but information as to the caller's location as well, decreasing response times and allowing first responders to more easily reach the location of the incident.

Currently, due to the lack of broadband coverage, the un- and underserved regions of the project area have no E911 functionality. There, the emergency response system is an unenhanced 911 system, with dispatchers needing to verbally ascertain callers' locations before first-response services can be sent. Extending the middle-mile infrastructure into these areas will enable connectivity to the E911 system.

Additionally, this network will connect all County-owned public safety radio towers as another level of redundancy. This connectivity will enhance voice and data communications between these towers and the County 911 Dispatch Center. Additionally, these towers will also serve as hub points on this network, allowing third-party service providers to service residents and businesses with wireless and/or fiber connectivity for their last mile connection.

These connections will strengthen the nation's resilience, providing enhanced emergency responsiveness during a disaster, whether naturally occurring or through the result of terrorist action. The increased connectivity will allow agencies to respond quickly to emergencies of all kinds, whether individual or national assets are at risk, including a local nuclear power plant. The connection to these towers will strengthen response times, providing a significant national security benefit resulting from this project.

These towers will also serve as potential last-mile connection points for wireless Broadband, further strengthening the last-mile capabilities of the middle-mile infrastructure.

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Project Duration

Number of Years

2

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Project Timeline Narrative

The narrative requires the Applicant to describe a project with critical path, including key milestones for implementation of the project, preparations, and risk factors; and a capital investment schedule evidencing that the applicant will complete build-out and the initiation of service within five years of the date on which the entity receives the grant and will meet interim buildout requirements set

forth herein and in any other binding document.
If the project is able to be accelerated with supplemental investments or in-kind support to meet a statutory purpose, this should be explained.

This response is limited to 6000 characters as an open field narrative.

This project is expected to be completed, lit, and operating well less than the statutorily required five years. Currently, this project is expected be completed twenty-three (23) months and two (2) weeks after the grant agreement has been finalized and the funds have been obligated.

Post-award, the first month will be spent fine-tuning the fiber route, with field surveys and preliminary engineering commencing roughly two weeks after the start of the project. Field surveys are expected to last approximately four-and-a-half months, with the preliminary engineering expected to be complete after three-and-half months.

One month into the project, the engineers will engage in make ready activities and O-Calc pole evaluations. O-Calc is a highly accurate and productive application for performing comprehensive pole loading analyses for joint use, equipment or line upgrades, system hardening, and pole replacement. These activities are expected to last approximately five months.

The engineers on this project expect to enter the final design phase two months after the grant agreement has been finalized, with this process lasting approximately five months. Concurrently, the permitting process, expected to last six months, will be undertaken.

Three-and-a-half months into the project, the contract documents will be prepared. Two months later, the bid process will be undertaken. Both will extend until eight months after the project has begun.

One month into the bid process, the partners in this project anticipate that construction will begin. There will be numerous contracts to bring this project to completion within 24 months, and, as such, the construction on the first awarded contract may begin while the bidding process continues throughout the first several weeks of construction. Construction of the middle-mile infrastructure is expected to last seventeen-and-a-half months, with closeout of the project taking place less than two years after it is initiated.

This project will be using eight (8) pre-existing towers as node points within the network, provided by the Counties as an in-kind match, thus significantly accelerating the schedule of completion.

The project assumes a two-year capital investment schedule, well in advance of the five-year statutory limit of funds on this program. In the first year, the partners in this project will expend $7,253,001 in grant funding and $2,094,692 in local match funds. In the second year, this project will expend $16,923,647 in grant funding and $4,887,616 in local match funds. Together, these two years will completely expend grant and match funding. The project becomes self-sufficient thereafter, with

revenues from sales of services supporting the operations and infrastructure.

This calendar is subject to change based on the award of the design contract, with revisions taking place during the initial kick-off meeting.

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Project Timeline File

Applicants are asked to upload a timeline which will denote key milestones for implementation of the project, including but not limited to field survey, network design, equipment/material procurement, environmental assessment, permitting, construction, network testing, network activation and completion.

Cumberland Salem Middle Mile Schedule 2022-09-09-29-2022 04-18-County of Cumberland-GRN-001414.xlsx

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Is an extension being requested?

No

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Special Rules for Tribal Governments and Native Entities

The Infrastructure Investment and Jobs Act permits the Assistant Secretary, in consultation with Tribal governments and Native entities, to waive, or specify alternative requirements, in connection with most directives governing the MMG Program if the Assistant Secretary finds that waiver or modification of the requirement is necessary for (a) the effective delivery and administration of middle mile grants to Tribal governments or (b) the construction, improvement, or acquisition of middle mile infrastructure on trust land.

Is a waiver or alternative requirements requested?

No

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Fair Labor Practices

Applicants must have a demonstrated record of and plans to be in compliance with federal labor and employment laws as described in III.H in the NOFO. This will help ensure that projects are carried out in accordance with the law, assist NTIA in ensuring that a prospective awardee is capable of carrying out activities funded by an award in a competent manner in compliance with all applicable federal, state, and local laws; and promote the effective and efficient completion of high-quality middle mile broadband infrastructure projects by ensuring a reliable supply of skilled workers and minimizing disruptive and costly delays.

This response is limited to 6000 characters as an open field narrative.

The partners in this project individually each have a long history of successfully marshalling projects funded with public monies, as well as those with fair labor practice requirements.

As project manager, the Cumberland County Improvement Authority (“The Authority”) will lead the bidding and construction process, ensuring that this process is fair and open process conducted in accordance with Federal procurement regulations found in 2 CFR 200. Further, The Authority customarily includes such language as part of their standard operating procedures for procuring all bids. In the documents for the bid for this project, The Authority will include Equal Employment Opportunity language and Affirmative Action Compliance language as provided in N.J.S.A. 10:5-31 et seq. (P.L. 1975, C. 127) N.J.A.C. 17:27 et seq., as well as Americans with Disabilities Act mandatory language.

In addition, pursuant to P.L. 2021, c. 301, all Contractors engaged by The Authority are duly notified that their contract is for a public work subject to the provisions at N.J.S.A. 34:11-56.25 et seq., the New Jersey Prevailing Wage Act (PWA). In addition, all Contractors are expected to post the prevailing wage rates for each craft and classification involved in the project in prominent and easily accessible places at the site of work and at such other places as are used by employer to pay workers.

Except as otherwise provided under 41 CFR Part 60, all contracts that meet the definition of "federally assisted construction contract" in 41 CFR Part 60-1.3, including the contracts for this project, will include the equal opportunity clause provided under 41 CFR 60-1.4(b), in accordance with Executive Order 11246, "Equal Employment Opportunity" (30 FR 12319, 12935, 3 CFR Part, 1964-1965 Comp., p. 339), as amended by Executive Order 11375, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," and implementing regulations at 41 CFR part 60, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor."

When required by Federal program legislation, all prime construction contracts in excess of $2,000 awarded by non-Federal entities will include a provision for compliance with the Davis-Bacon Act (40 U.S.C. 3141-3144, and 3146-3148) as supplemented by Department of Labor regulations (29 CFR Part 5, "Labor Standards Provisions Applicable to Contracts Covering Federally Financed and Assisted Construction"). In accordance with the statute, contractors must be required to pay wages to laborers and mechanics at a rate not less than the prevailing wages specified in a wage determination made by the Secretary of Labor. In addition, contractors must be required to pay wages not less than once a week. The non-Federal entity must place a copy of the current prevailing wage determination issued by the Department of Labor in each solicitation. The decision to award a contract or subcontract must be conditioned upon the acceptance of the wage determination. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency.

The engineering firm on this project, V-COMM , upon accepting the bid offered by The Authority, has

attested that they will abide by their fair labor and employment law requirements.

As grant administrator, Triad Associates has over forty years of experience in ensuring that projects funded from public sources comply with all necessary wage and fair labor laws, having overseen over $1.3 billion in projects throughout the organization's four decades. They will continue this work overseeing the implementation of this grant.

The Authority will direct all contractors and subcontractors to ensure the implementation of workplace safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment projects. In addition, all grant funds will be expended in accordance with the Build America, Buy America Act.

As lead applicant, Cumberland County has had one Occupational Safety and Health Act (OSHA) violation in the past three years. Upon an inspection on November 4, 2021, the following four citations were issued:

1. Serious: 29 CFR 1910.134(c)(1): A written respiratory protection program that included the provisions in 29 CFR 1910.134(c)(1)(i) - (ix) with worksite specific procedures was not established and implemented for required respirator use.

2. Serious: 29 CFR 1910.134(e)(1): The employer did not provide a medical evaluation to determine the employee's ability to use a respirator, before the employee was fit tested or required to use the respirator in the workplace.

3. Serious: 29 CFR 1910.134(f)(5): Respirator fit tests were not administered using an OSHA-accepted qualitative fit test or quantitative fit test protocol.

4. Serious: 29 CFR 1910.134(k)(5): Respiratory protection retraining was not conducted annually.

As attested to in the attached documents , all four citations were certified as abated on March 11, 2022.

No other entities involved in this project have been found to have violated laws such as the Occupational Safety and Health Act, the Fair Labor Standards Act, or any other applicable labor and employment law in the past three years.

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Officer Certification

In order for NTIA to evaluate an applicant's demonstrated record of and plans to be in compliance with federal labor and employment laws, each applicant must provide examples of items described in III.H in the NOFO. Applicants are asked to upload a Certification from an Officer/Director-level employee (or equivalent) of the applicant evidencing consistent past compliance with federal labor

and employment laws by the applicant, as well as contractors and subcontractors.

Labor Law Compliance-09-29-2022 11-22-County of Cumberland-GRN-001414.pdf, 1560937 Closing letter citations abated-09-29-2022 04-23-County of Cumberland-GRN-001414.pdf, 1560937 Cumberland Co Sheriffs OTC-09-29-2022 04-23-County of Cumberland-GRN-001414.pdf
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Highly Skilled Workforce

To ensure that applicants have the technical and operational capacity to carry out the project, applicants must submit a plan for ensuring that the project workforce will be an appropriately skilled and credentialed workforce (including by the applicant and each of its contractors and subcontractors). The plan for a highly skilled workforce should include the information described in III.I in the NOFO.

This response is limited to 6
000 characters as an open field narrative.

With the assistance of V-COMM, L.L.C., the Counties have developed a plan to ensure all entities engaged in construction of the project are properly trained, certified, and licensed.

V-COMM will assist the Counties with not just development of the technical standards of the fiber plant, but also the development of the criteria to select contractors capable of completing the project. As these contractors have not yet been identified, a public bid process will be used to solicit highly skilled electrical and civil contractors capable of efficiently building the proposed middle-mile fiber project. To ensure bid respondents are qualified, requirements for prior work on similar size and scope projects and proof of licensing and professional certifications of all members of the workforce will be required.

The Authority will partner with the Cumberland County Center for Workforce and Economic Development (CCCWED) to ensure that organization will direct their activities to ensure that appropriate apprenticeships and other training programs are developed in order to create the appropriately trained workforce necessary to successfully complete this project. The two entities have a long history of working in collaboration with one another, not only to ensure that County projects are properly staffed, but also to ensure that the development initiatives spearheaded by The Authority will similarly have appropriately staffed and credentialed workforces.

The construction of this middle-mile infrastructure will be completed by a subcontracted workforce; however, the eventual maintenance of the final project will be overseen by The Authority and their directly employed workforce.

As the subcontractors for this project have yet to be determined, the unionization status of the workforce cannot be determined. However, it is common practice for The Authority to hire unionized

workers. Should this not be the case in this instance, the requirements set out in section III.J. of the NOFO will be supplied prior to the initiation of work.

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Advancing Workforce Development

A skilled workforce is critical to meeting infrastructure buildout timelines under the Infrastructure Act and connecting households across the country to reliable, affordable, high-speed broadband. A well-trained workforce will also allow for the safe deployment of sustainable networks. To meet the workforce needs of the MMG Program, applicants must make appropriate investments to develop a skilled, diverse workforce. Each applicant must provide as part of its application examples of items described in III.J in the NOFO.

This response is limited to 6000 characters as an open field narrative.

Identified as the first recommendation in the Cumberland County Improvement Authority's Economic Development Strategic Plan for Cumberland County, the construction of the middle-mile infrastructure proposed in this application has been in development for several years. As such, the plan's other initiatives – including to "create and support an innovation culture" – will be leveraged to support this project.

The partners in this project will support the development and use of a highly skilled workforce capable of carrying out the execution of this project in a manner that is safe and effective. Cumberland County will partner with the local workforce board, the Cumberland County Center for Workforce and Economic Development (CCCWED), and their educational stakeholders to attract, train, retrain, or transition workers to meet the local workforce needs and increase high-quality job opportunities.

The CCCWED has numerous incentive programs, including for employers who hire for full-time positions that pay at least the New Jersey state minimum wage. These programs reimburse the employer for 50% of the workers' salaries in exchange for providing training for a period of up to 26 weeks to an unemployed jobseeker or public assistance recipient. Employers who hire individuals receiving public assistance may also be eligible for no-cost, six-month, $25,000 Federal bonds.

The job opportunities created by this project will be available to a diverse pool of workers, including for women and people of color. Employment initiatives have traditionally targeted three populations of need: dislocated workers, low-income adults, and disengaged youth. As outlined in the Level of Need, the rates of poverty throughout the project area point to a sizeable population of low-income adults

who require remedial training, job opportunities, and new career paths.

The partners in this project will create equitable on-ramps into broadband-related jobs through assistance to employers to seek a Federal tax credit ranging from $2,400 to up to $9,600 for employers who hire and retain veterans and individuals from other target groups with significant barriers to employment, including SNAP and TANF recipients, ex-felons, social security recipients, and the long-term unemployed.

In addition, the CCCWED facilitates the disbursement of grant funds, competitively awarded to New Jersey employers to provide cost reimbursement assistance to train incumbent frontline employees to meet the current and future occupational skill requirements of available high-wage, middle-skill and high-skill jobs in New Jersey. Grant funds are intended to achieve measurable outcomes for employees, “seed” occupational skills training, and support New Jersey businesses to acquire a skilled workforce. Training the highly skilled workforce necessary for the successful completion of this project – as well as the continued maintenance thereof – will qualify for assistance under this program.

Cumberland County and the Cumberland County Improvement Authority have engaged in a number of workforce-development and job-quality activities through an ongoing shared service agreement. There are four key components that address the needs of both county Workforce Development and Economic Development: Business Retention, Enhanced Business Services, Special Events, and other Business Relations/Development.

This provides a single point of contact for the full range of County, Workforce Development, and Economic Development services. It eliminates duplicative employer efforts and advances a One Stop location for all the prospective employer’s site development, financing, and workforce development needs. This makes the process of economic development much more efficient, providing the delivery of services in a much more timely fashion. This type of collaborative approach to development has historically impressed prospects seeking to locate to the region and is a valuable asset in an increasingly competitive economic environment.

Further, both organizations have partnered with the Rowan University of South Jersey on numerous apprenticeships geared toward preparing the unskilled worker for gainful employment. These apprenticeships span a variety of industries; however, existing programs in utility training and technical education will prove beneficial to this program.

As project manager, The Authority will utilize its extensive experience and capacity to account for and satisfy parts II and III of Executive Order 11246, Equal Employment Opportunity (30 Fed. Reg. 12319), which requires that federally assisted construction contracts incorporate and fulfill the nondiscrimination provisions of §§ 202 and 203 of Executive Order 11246 and Department of Labor regulations implementing Executive Order 11246 (41 C.F.R. § 60-1.4(b)). The Authority will account for and satisfy Executive Order 13166, Improving Access to Services for Persons with Limited English

Proficiency (65 Fed. Reg. 50121), which requires federal agencies to examine the services that they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. As Cumberland County has a high percentage of Spanish speakers, The Authority is well accustomed to ensuring that LEP persons are included in any and all processes. In addition, The Authority will account for and satisfy Executive Order 13798, Promoting Free Speech and Religious Liberty, and Office of Management and Budget, M-20-09 – Guidance Regarding Federal Grants and Executive Order 13798 (January 16, 2020), which provide that States or other public grantees may not condition sub-awards of federal grant money in a manner that would disadvantage grant applicants based on their religious character.

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Climate Resiliency

Please demonstrate that the applicant has sufficiently accounted for current and future weather- and climate-related risks to new MMG Program infrastructure projects. In particular, each applicant should clearly demonstrate how it is conducting the items listed in III.K in the NOFO.

This response is limited to 6000 characters as an open field narrative.

Cumberland and Salem Counties are situated on the Delaware Bay in southern New Jersey, and both counties score “Relatively High” on the Coastal Flooding and High Wind Hazard Types according to the FEMA National Risk Index.

A hazard screening will be performed over the entire fiber route, considering a 20-year project life; and will include both desktop and field evaluations. The desktop screening will include the use of the 2018 National Climate Assessment, NOAA’s 2022 climate summaries, NOAA’s disaster and risk mapping tool, and FEMA’s National Risk Index and Mapping. Aerial mapping will also be reviewed to determine approximate topography, distances to streams and coast lines, and determining if certain areas are susceptible to wildfires. Each utility pole and or supporting structure will be visited, inspected, and evaluated during the initial phase. This initial phase will be completed within six weeks of the start of the project.

Weather / climate hazards that must be accounted for over the project’s life cycle of 20 years will be identified utilizing various resources. The regional chapters of the 2018 National Climate Assessment and NOAA’s 2022 state climate summaries will be utilized to understand current weather characteristics in the region as well as project future weather intensity levels. FEMA’s National Risk

Index and flood risk maps will serve to identify areas which are currently susceptible to flooding and those that could be impacted by rising sea levels or increased water runoff. As part of the evaluation, NOAA's Disaster and Risk mapping tools as well as their Climate Explorer and Digital Coast tools will play a vital role in determining current and future weather and climate related risks.

As the proposed method for running the fiber optic cables are pole attachments, the cable plant will not have any immediate issues due to flooding. High winds have a risk of toppling trees onto the right-of-way where the fiber plant is to be installed. Routes will have to reviewed to determine where utility poles need to be replaced due to structural concerns to support the extra stress due to a fallen tree. Deployed fiber optic cables will have the physical characteristics to withstand the stress of fallen tree limbs. These physical characteristics will also mitigate against ice buildup in the winter months.

Flooding will present a problem for the proposed shelters that will house patch panels and other optical electronics. These shelters are normally constructed as weather-proof and controlled environments but are not sealed to prevent floodwaters from entering. If they are in a flood plain, these structures can be built on elevated platforms to mitigate floodwaters damaging the shelter.

To further mitigate outages due to weather and climate-related risks, the fiber plant is being designed and deployed in a ring configuration. Should a section of the fiber plant be damaged, an alternate pathway will be available to complete connectivity to disconnected fiber shelters. These redundant pathways are also being developed out to the datacenters in Wilmington, DE, and Philadelphia, PA to ensure connectivity to entities providing last-mile internet services is not interrupted.

As the fiber plant will primarily be installed on utility poles on the right-of-way, periodic inspection of the utility poles will have to be conducted to identify poles that require replacement. As these poles are primarily owned by other entities (Verizon, Vineland Municipal Electric Utility, and Atlantic City Electric), the Counties will work with these entities to continue with their periodic inspection of poles.

As part of designing and developing a Middle Mile Program within Cumberland and Salem Counties, an Operation and Maintenance Manual will be created. This manual is a detailed written description of systematic procedures for ensuring that the network is operated and maintained properly. This document will provide timing of inspection and maintenance of key areas of the broadband infrastructure. This will include the fiber plant, supporting structures, and telecommunications equipment. The manual will also detail the periodic reevaluation of the entire system. The reevaluation will include all aspects of the original design and include a review of the weather and climate risks and determine if those risks need to be recharacterized from the original design.

Once the weather and climate risks have been formally identified, a plan and design will be formalized to reduce or eliminate the impact. For inundation risk factors, equipment and shed elevations will be set such that they are no longer a factor. For wind-related risk factors, current and future loading considerations will be incorporated to future-proof the design. For brushfire related risk factors a

vegetation management plan will be developed and heat resistant materials and equipment this will be considered during the selection process.

The Operation and Maintenance manual will provide the timing of inspection and maintenance of key areas of the broadband infrastructure. To ensure that the installation performs throughout the life of the project, it will be recommended that the entire fiber installation be inspected annually to ensure it is still being properly supported and functioning as intended. In addition, every five years the original design criteria will be checked to confirm that it has not changed, and the hazard screening will be confirmed and or updated. The telecommunications equipment will be remotely monitored and inspected in accordance with the manufacturer's recommendation.

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Civil Rights and Nondiscrimination Law Compliance

Prior to distributing any MMG Program funding to a prospective awardee, NTIA will require the prospective awardee to agree, by contract or other binding commitment, to abide by the non-discrimination requirements set forth in III.J in the NOFO.

Do you agree to abide by the non-discrimination requirements?

Yes

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Certification of Technical Capability

Each applicant must supply a certification attesting that it is technically qualified to complete and operate the proposed project.

Technical Capability-09-29-2022 11-24-County of Cumberland-GRN-001414.pdf, Certifications by Director-04-10-2023 02-43-County of Cumberland-GRN-001414.pdf

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Interconnect Policy

The Applicant must describe in detail the nondiscrimination, interconnection, and network management practices that would be adopted for the project facilities. The Applicant should describe how it will comply with nondiscrimination and interconnection obligations, particularly with connectivity to the public Internet and physical interconnection for the exchange of traffic. In addition to describing network management practices, the Applicant should disclose any practices in place to block access to illegal or harmful content.

This response is limited to 6000 characters as an open field narrative.

The proposed middle-mile infrastructure, as directed by Section 60401(e)(3)(D) of the Infrastructure Act, will offer interconnection in perpetuity, where technically feasible without exceeding current or

reasonably anticipated capacity limitations, on reasonable rates and terms to be negotiated with requesting parties. Such interconnection must include both the ability to connect to the public internet and physical interconnection for the exchange of traffic.

The partners in this project will meet or exceed the requirements set forth by the FCC's Internet Policy Statement, FCC 05-151, adopted August 5, 2005 regarding non-discrimination. Further, the partners will actively encourage Broadband deployment and the preservation and promotion of the open and interconnected nature of the public Internet. State bidding requirements include nondiscrimination for construction as well as the operations of publicly developed projects.

The middle-mile infrastructure proposed will be high-capacity, point-to-point private line transport services. The content of communications traffic will not be monitored, managed, or limited in any way, except to the extent necessary to maintain service on a reliable basis. The partners in this project intend to employ management practices that will not involve the preferential routing of traffic on the basis of provider or content. Neutral traffic routing will be employed, with connections maintained without respect to carrier.

Additionally, traffic on the proposed middle-mile network will be exchanged from a likewise agnostic standpoint, without respect to network carrier, technology, or pricing. This network will be maintained according to the principles set forth in Executive Order 2021-15069, Promoting Competition in the American Economy, instructing the FCC to restore New Neutrality.

The partners in this project will negotiate with requesting parties to interconnect on reasonable terms and conditions, subject to the prevailing market conditions.

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Technical Overview

Please describe targeted last mile service objectives, including last mile service provider letters of commitment, agreements, or contracts; and a description of the proposed service offerings, including the pricing of the services to be offered over the proposed facility.

This response is limited to 6000 characters as an open field narrative.

It is the intent of the shared service partners in this project to make this middle-mile infrastructure available to whichever entities seek to use it.

Currently, as explained further in the Competitive Landscape section, there are as many as nine last-mile service providers claiming service in the two-county region. Four of these providers are satellite service providers. While the service provided by these satellite providers may be accessed by anyone, anywhere, the service they provide does not satisfy the upload/download speed requirements to be considered high-speed broadband. Further, as much of the terrain throughout this region is heavily wooded, connections to satellite last-mile service is practically impossible for many in the project area.

As satellite providers, they are not expected to utilize the proposed middle-mile infrastructure.

The partners in this project have received commitments from last-mile service providers in the region to interconnect with the proposed middle-mile network to provide last-mile Broadband internet services at speeds that will satisfy the MMG program requirements.

In addition, as the included letter will attest and is explored in further detail below, the Vineland Municipal Electric Utility is in the process of developing their own middle- and last-mile infrastructure and service. They have likewise committed to interconnect with the proposed middle-mile network to provide last-mile Broadband internet service at speeds of no less than 100 Mbps downstream and 20 Mbps upstream throughout the project area.

This project proposes to construct approximately 220 route miles of dark-fiber middle-mile infrastructure. This infrastructure will be offered to whichever companies wish to utilize this network to construct their own last-mile infrastructure. The two counties involved in this proposal wish to provide this network without respect to provider, as explained further in the Interconnect Policy provided as part of this application, as a benefit to their respective residents.

The Counties plan to price the connections to the middle-mile network incredibly competitively. The fiber cable will contain 1,728 strands of fiber; however, due to the redundant bi-directional design of the proposed network, half of the total number of strands are expected to be available for use by third parties, or 864. These are priced at $1,000/month, whereas, according to data provided by V-COMM, the market rate for such connections is closer to $1,500/month for the project area. Conservatively, it is expected that the Counties will sell 5% of the available strands per year, beginning in the third year of the project, after construction is complete, and adding an additional 5% each year until all possible strands are sold.

Additionally, the project is expected to generate colocation revenue, as the last-mile providers will likely need to rent space from the Counties inside each fiber network hub shelter to provision last mile connections to nearby residents and businesses. The Counties are likewise pricing this colocation at an incentive, at $100/month, while the market rate is usually $300-500/month.

Furthermore, there are six towers in this project with leasable space. The Counties are pricing these at an incentive, as well to entice providers to offer wireless last mile services to hard-to-reach areas which have been historically overlooked due to Return on Investment (ROI) concerns of the providers. Typically, the market rate for such a lease is approximately $1,500/month; the Counties are pricing this at $500/month. Since these towers also have the potential to be used for cellular service – and the areas marked un- and underserved for broadband are typically un- or underserved for cellular service – this project has the potential to increase cellular coverage in these far-flung areas, as well, particularly along the Delaware Bayshore. In addition to last mile wireless connections, cellular connections are expected to improve which also assists First Responders when assisting residents in these outlying

areas.

The towers would be potential leasing opportunities for last-mile providers. WISPs and FWA providers will be the targeted tenants. At the time of the application, T-Mobile and the City of Vineland supplied letters of support stating their interest in using the middle-mile architecture once it is built.

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Applicants are encouraged to upload supplemental documentation.

Vineland-09-29-2022 03-29-County of Cumberland-GRN-001414.pdf, T-Mobile-09-30-2022 12-05-County of Cumberland-GRN-001414.pdf

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Competitive Landscape

The Applicant should describe existing middle mile offerings in the area, if any, including competitor data if applicable. This should include a description of the proposed service offerings, including the pricing and technology of the services to be offered over the proposed facility. Where possible, Applicant's project should be able to demonstrate a decline in middle mile costs that are likely to flow through to consumer broadband prices.

This response is limited to 6000 characters as an open field narrative.

Currently, the middle-mile offerings in the project area are minimal, inconsistent, and substandard. There are a few miles of fiber middle-mile infrastructure in the larger cities of Vineland and Millville as well as some nominal infrastructure in the westernmost towns along the Delaware River in Salem County. There is no middle-mile infrastructure in the rural areas of the two-county region, nor is there any middle-mile infrastructure that extends into the more populous areas along the Delaware Bayshore. As such, these are the areas with the most unserved and underserved populations: the intent of this project is to mitigate this problem.

According to FCC 477 mapping data, there are approximately nine last-mile service providers who claim service in the project area: four satellite providers, two fixed-wireless providers, one fiber provider, one ADSL provider, and one cable provider.

Four satellite internet service providers claim service; however, the service they provide typically does not satisfy the download/upload speed requirements of the program, with download speeds ranging between 2 Mbps and 100 Mbps with upload speeds ranging between 1.3 Mbps and 10 Mbps. These companies are not expected to utilize the proposed middle-mile infrastructure.

There are two fixed-wireless service providers, as well. The service provided by these companies generally fail to satisfy the download/upload speed requirements: both companies claim 25 Mbps download speeds and either 3 or 4 Mbps upload speeds. One company advertises download speeds "between 33-182 Mbps" with no data caps for $50/month with AutoPay ($55/month without). As

wireless interconnections will be provided, these companies are expected to utilize this middle-mile infrastructure.

One company provides ADSL service which does not satisfy the download/upload speed requirements of the program. Depending on the census block, this company claims between 5 and 10 Mbps download speeds and upload speeds between 0.384 and 0.768 Mbps.

One of the major service providers fills the last-mile service through fiber; numerous residents avail themselves of this service. The company claims 940 Mbps download speeds and 880 Mbps upload speeds, offering “1 Gbps” service for $89.99/month with the price guaranteed not to change for four years, 500/500 Mbps plans are $69.99/month with the price guaranteed not to change for three years, and 300/300 Mbps plans for $49.99/month with the price guaranteed not to change for two years. They offer discounts for current cellular customers.

The other major service provider in the area fills the last-mile service connection through cable, fulfilling the speed requirements of the program, providing download speeds of 1200 Mbps and upload speeds of 35 Mbps. Their “affordable” plans provide either 50 or 100 Mbps download speeds, and they offer to connect customers through the federal Affordable Connectivity Program (ACP); however, not all of these speeds satisfy the speed requirements of the MMG program. In addition, this company advertises 6000 Mbps download speeds for $299.95/month for two years, 1200 Mbps for $89.95/month for the first 24 months, 900 Mbps for $79.99/month for 24 months, 600 Mbps for $69.99/month for 24 months, and 300 Mbps for $49.99/month.

For even the most basic plans in the project area, customers are expected to pay approximately $50/month. According to residents in the project area, the companies with speeds and plans satisfying the MMG requirements provide lackluster customer service with frequent service interruptions. Further, it is strongly believed by residents throughout the project area that the two companies fail to compete for customers, instead choosing to allow the other company a monopoly in a particular area, down a specific street, or even on opposing sides of the same street. Based on data from V-COMM, it’s been noted that, in areas where one major service provider has a stronghold, the other tends to scale back the locations they service. In response, the service provider with the established customer base charges higher prices than they charge in areas with stronger competition.

With this investment, these companies will be able to provide better service to their current subscribers, as the design of this modern network is superior to current offerings and will be far less prone to service interruptions. In addition, the nondiscriminatory nature of this middle-mile infrastructure is expected to encourage new providers who will be able to offer truly reduced rates that will satisfy the speed requirements of the program, providing equity for potential end-users. Further, the construction of this middle-mile infrastructure will ultimately provide considerable network-wide cost savings that is expected to directly benefit the end user.

The City of Vineland – the most populous city in the project area – has spent the past several years developing a network of City-provided middle- and last-mile Broadband infrastructure. Home to the only municipal electric company in the State of New Jersey, the Vineland Municipal Electric Utility (VMEU) currently has the infrastructure to provide this service throughout the City. With the VMEU's over 100 years in business, extending this service throughout the two-County region will be an undertaking well within their organizational and financial capacity.

The Vineland Municipal Electric Utility, in conjunction with the City, is currently in the process of finalizing Shared Services Agreements with the two Counties to provide last-mile infrastructure to residents and businesses and act as an ISP to provision broadband services throughout the proposed project area. The partners in this project fully expect these agreements to be adopted prior to the issuance of any grant agreement. Please see the included letter from the City of Vineland.

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Type of technology to be used in proposal:

Fiber Optic Technology

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Each applicant of an award to build middle mile infrastructure using fiber optic technology shall certify that the proposed project, upon completion, will include direct interconnection facilities that will facilitate the provision of lit broadband service, at speeds not less than 1 Gigabit per second for downloads and 1 Gigabit per second for uploads to anchor institutions located within 1,000 feet of the middle mile infrastructure, as detailed in the Template CAI below.

Do you agree to certify to the above?

Yes

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Upload Template CAI. Required for Fiber Optic Technology, optional for Wireless or Other.

MMG Community Anchor Institution Final-09-29-2022 11-27-County of Cumberland-GRN-001414.xlsx

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An eligible entity applying for a middle mile grant may seek, and the Assistant Secretary may grant, a waiver of the requirements set out in the previous paragraph, in full or in part, to the extent the eligible entity demonstrates that the requirement is not technically or economically feasible.

Do you plan to apply for a waiver? If yes, please attach the waiver application in the Application Workspace, the Application Information section, Required Documents under Required Document Question 4 "Additional Waiver Upload".

No

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Network Route Maps

Applicants should provide a physical network map that includes the following (if applicable):

The Project Area and those unserved and underserved areas which it will enable.
Applicant‘s pre-existing service area that demonstrates current service levels.
The physical path of the network‘s transmission medium (e.g., backbone and lateral cable routes, microwave links), transmission type, technology, operating bandwidth, capacity (e.g., dark vs. lit strand count), and cable placement (e.g., aerial, burial) should be displayed.
Points of interconnection (purely passive and non-environmentally controlled nodes, e.g., splice points are optional):Provider Facilities
Collocation Facilities
Private Interconnection Points with partnering service provider/private network

Wireless towers and associated coverage areas.
Anchor institutions within 1,000 feet, if desired.
Additionally, the maps should delineate between network and facilities that are:Part of the Applicant's/key partners' existing network;
Proposed as part of this project;
Leased from a third party;
Utilized under some alternative arrangement; or
Relevant to interconnection with either Last Mile or Middle Mile service providers.

PLEASE NOTE: Only ESRI Shapefiles will be accepted and uploaded.

MMG Route Miles-09-29-2022 04-46-County of Cumberland-GRN-001414.zip
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Data Submission Specification

There is a template “Upload Template Data Submission Specification” which shall be uploaded. Applicants must complete the table with information for all interconnection points proposed for the network. This table has three required fields: Point Name, Latitude and Longitude. This should accommodate all of the points of interconnection (passive, non-environmentally controlled points of interconnection, e.g., splice points, may be excluded), collocation facilities, central offices, head ends, and other centralized facilities, network access points to Last Mile service providers, Internet peering points, and towers.

MMG Interconnection Points-09-29-2022 04-45-County of Cumberland-GRN-001414.xlsx

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Network Diagram

The Applicant must provide a high-level network diagram to be uploaded for the project that is a representation of the network, capacities, and facilities. The diagram must clearly denote which of the network elements already exist. The diagram should show:

The links between the network nodes. The types of facilities used in connecting the network elements (fiber, wireless microwave, etc.).

The points of interconnection and collocation facilities, including Internet peering points, access to local exchange carriers, central offices, or cable head ends.

The proposed aggregation node facilities that will provide the egress point(s) from the broadband backbone to the networks of the selected service provider(s), named Last Mile service providers, and the selected named Internet Service Provider(s) in the new infrastructure.

The Applicant should show which technologies are used and include bandwidth capacity constraints.

Cumberland Salem MMG Fiber Ring Map-09-29-2022 04-52-County of Cumberland-GRN-001414.pdf

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Environmental Narrative

Any project-related activity that may adversely affect the environment must not be undertaken prior to the completion of the environmental review process prescribed by NTIA. Doing so may jeopardize consideration of the application.

All Applicants for MMG projects must comply with the National Environmental Policy Act, the National Historic Preservation Act, and the Endangered Species Act, and other applicable environmental regulations.

Please provide a service-area environmental description that describes the physical project area and its surroundings (e.g., disturbed or developed land vs. open space; adjacent natural resources, such as rivers, wetlands, or forestlands; and any protected lands or resources in or near the project area), including site photographs and aerial photographs (e.g., Google Earth or Google Maps images), if the project includes construction and/or ground disturbing activities.

This response is limited to 12000 characters as an open field narrative with image files to be uploaded.

The project will entail deployment of a middle mile dark fiber network. This will encompass approximately 220 route miles of fiber optic cable attached to the existing utility poles along existing utility rights-of-way. The fiber plant is planned to terminate in 25 new outdoor equipment shelters, most of which are on properties that already have County-owned communication facilities. As a majority of this project is on properties with existing facilities and using existing rights-of-way, new ground disturbances will be limited, and it is not anticipated that any adverse environmental concerns would be encountered during deployment of the fiber. Before the commencement of any new construction activities, the Counties will complete all applicable environmental screening, including those outlines in the National Environmental Policy Act (NEPA), the National Historic Preservation Act, the Endangered Species Act, and other applicable environmental regulations.

Farmland and forest pervade the service area. Agriculture has long been one of the most prevalent industries in the two-County region, and, while the region has substantially diversified its economic base, farming remains a significant industry, with food processing and packaging beginning to make inroads into the Counties' diversification. Further, while there are pockets of development and even some urban areas, much of the area within the two Counties that isn't farmland is forested.

As the two Counties lie along the Delaware River and Delaware Bay, there are considerable wetlands throughout the service area. Historically, this has been one of the mitigating factors in the lack of service along the Delaware Bayshore. This middle-mile infrastructure has been designed to interact with this resource as little as possible. In the locations where it is not possible to avoid wetlands, Coastal Area Facility Review Act (CAFRA) permitting will be necessary, in addition to NEPA compliance. Please see the included map for wetlands interaction.

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Upload Map Images:

MMG Satellite-09-29-2022 05-30-County of Cumberland-GRN-001414.zip

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Negotiated Indirect Cost Rate Agreement

This is a document published to reflect an estimate of indirect cost rate negotiated between the Federal Government and a Grantee's organization which reflects the indirect costs (facilities and administrative costs) and fringe benefit expenses incurred by the organization. This must be completed, if applicable.

Not Applicable-09-30-2022 11-41-County of Cumberland-GRN-001414.docx

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Template Table of Funded Partners and Unfunded Collaborators

List all funded and unfunded project collaborators, including partners, subrecipients, match providers, major contractors/supplies, details on role/scope of work for project. A fillable Template

of Funded Partners and Unfunded Collaborators can be found in found in the MMG ZIP folder.

MMG Template Table of Funded Part-09-29-2022 01-17-County of Cumberland-GRN-001414. and Unfunded Collaborators Final.xlsx

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Certificate of Operational Capability

Each applicant must supply a certification from an officer-level employee (or individual of comparable rank) attesting to the applicant's operational capability to complete and operate the proposed project.

If the applicant has provided a voice and/or broadband internet access service, it must supply a certification from an officer-level employee (or individual of comparable rank) attesting that it has filed FCC Form 477s and the Broadband DATA Act submission, if applicable, to the extent required during this time period and otherwise complied with the Commission's rules and regulations. Alternatively, the applicant must explain any pending or completed enforcement action, civil litigation, or other matter in which it was alleged to have failed to comply with Commission rules or regulations.

If the applicant has operated only an electric transmission or distribution service, it must submit qualified operating or financial reports that it has filed with the relevant financial institution for the relevant time period along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution.

If applicable, the applicant must submit a certification from an officer-level employee (or individual of comparable rank) that is has operated a middle mile broadband network for at least two years or that it is a wholly owned subsidiary of such an entity and must specify the number of years the applicant or its parent company has been operating.

Operational Capability-09-29-2022 11-44-County of Cumberland-GRN-001414.pdf

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Certification of Financial Capability

Each applicant must supply a certification from an officer-level employee (or individual of comparable rank) attesting that it is financially qualified to meet the obligations associated with a project, that they will have available funds for all project costs that exceed the amount of the grant, and that they will comply with all MMG Program requirements, including service milestones.

Financial Certification and Salem Match Commi-09-29-2022 01-21-County of Cumberland-GRN-001414.pdf

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Letter of Credit

During the application process, each applicant must submit a letter from a bank meeting eligibility requirements consistent with those set forth in 47 C.F.R. § 54.804(c)(2) committing to issue an irrevocable stand-by letter of credit, in the required form, to the applicant. The letter shall at a minimum provide the dollar amount of credit offered and the issuing bank's agreement to follow the terms and conditions of NTIA's model letter of credit. NTIA shall publish on its website a model letter of credit substantially similar to the model letter of credit established by the Federal Communications Commission in connection with the Rural Digital Opportunity Fund (RDOF - Rural Digital Opportunity Fund Order, 35 FCC Rcd at 773-77, Appx. C.).

NTIA will ensure, prior to issuing a middle mile grant award, that each eligible entity obtains an acceptable, irrevocable standby letter of credit in a value of no less than 25 percent of the award amount.

Each eligible entity shall provide with its letter of credit an opinion letter from its legal counsel clearly stating, subject only to customary assumptions, limitations, and qualifications, that in a proceeding under Title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the "Bankruptcy Code"), the bankruptcy court would not treat the letter of credit or proceeds of the letter of credit as property of the winning bidder's bankruptcy estate under Section 541 of the Bankruptcy Code.

Cumberland Couunty - Broadband Grant Waiver o-09-29-2022 01-38-County of Cumberland-GRN-001414.pdf, Ms-09-29-2022 02-14-County of Cumberland-GRN-001414. Sarah Bleau Letter.pdf, Cumberland County Moody's Credit Opinion 2022-09-30-2022 01-10-County of Cumberland-GRN-001414.pdf, S&P Rating Report 6-7-22 (SALEM COUNTY)-09-30-2022 01-11-County of Cumberland-GRN-001414.pdf, local_bond_qualified_bond_11-09-11-15-2022 11-29-County of Cumberland-GRN-001414.pdf, LOC Waiver Clarification - NTIA Middle Mile 0-03-08-2023 02-26-County of Cumberland-GRN-001414.08.2023.pdf, NTIA LOC Waiver - Cumberland County 03-03-16-2023 07-48-County of Cumberland-GRN-001414.16.2023.pdf

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Audited Financial Statement (Previous 3 Years)

Each applicant shall submit financial statements from the most recent fiscal year that are audited by an independent certified public accountant. If the applicant is not audited in the ordinary course of business, in lieu of submitting audited financial statements it must submit unaudited financial statements from the three prior fiscal years and certify that it will provide financial statements from the three prior fiscal years that are audited by an independent certified public accountant by an NTIA specified deadline.

***You must provide 3 years of audited financial statements.**

Audited Financial Statements-09-29-2022 01-48-County of Cumberland-GRN-001414.pdf

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Historical Financial Statements (Previous 3 Years)

Each applicant shall submit financial statements from the three prior fiscal years that are audited by an independent certified public accountant. If the applicant is not audited in the ordinary course of business, in lieu of submitting audited financial statements it must submit unaudited financial statements from the three prior fiscal years and certify that it will provide financial statements from the three prior fiscal years that are audited by an independent certified public accountant by an NTIA specified deadline.

***You must provide 3 years of historical financial statements.**

Audited Financial Statements-09-30-2022 01-14-County of Cumberland-GRN-001414.pdf

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Budget Narrative

Applicants will create and submit a budget narrative that adequately describes all proposed activities and costs for their grant-funded project. Applicants must complete the file template, fill in all required information, and upload the file
. The file must be uploaded as a Word file, and not converted to a PDF. You can find additional guidance in the MMG Application Guidance.

MMG Budget Narrative Final-09-30-2022 01-29-County of Cumberland-GRN-001414.docx, Budget Narrative-04-06-2023 10-47-County of Cumberland-GRN-001414.pdf, Update Budget Narrative-04-06-2023 12-37-County of Cumberland-GRN-001414.pdf

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Template Detailed Budget Justification

The Detailed Budget Justification spreadsheet must reflect the cost categories that appear on the SF-424 and SF-424C and include itemized calculations for each cost placed under those categories. A fillable Template Detailed Budget Justification can be found in found in the MMG ZIP folder.

MMG Template Detailed Budget Justification Fi-09-30-2022 12-02-County of Cumberland-GRN-001414.xlsx, Detailed Budget Justification-04-06-2023 10-46-County of Cumberland-GRN-001414.pdf

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Any other funding provided for this project?

No

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Template Pro Forma

Pro forma financial projection and analysis related to the project's sustainability, inclusive of subscriber (e.g., last mile network connections, other wholesale services), across an eight-year forecast period. A fillable Template Pro Forms can be found in the MMG ZIP folder.

Cumberland and Salem Counties_MMG Proforma In-09-29-2022 02-51-County of Cumberland-GRN-001414.xlsx, Pro Forma Info-04-06-2023 10-49-County of Cumberland-GRN-001414.pdf

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