September 12, 2022

Office of Internet Connectivity and Growth
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

Dear National Telecommunication and Information Administration,

This letter is being written to express our support of Dairyland Power Cooperative's (DPC) Tri-State Fiber Deployment Project; a multifaceted endeavor that will bring about much needed middle mile infrastructure to predominately rural communities in south-east Minnesota, northern Iowa, south-west Wisconsin, and northwest Wisconsin through the NTIA's Middle Mile Grant Program.

Founded in 1939 by a group of farmers in Jo Daviess and Carroll Counties in Illinois, Jo-Carroll Energy, Inc. (NFP), hereafter referred to as JCE, is a not-for-profit cooperative, founded and built by the members we serve to deliver safe, reliable and affordable energy and broadband internet services.

Today, JCE provides services to over 26,500 rural members in Jo Daviess, Carroll, Whiteside and Henry counties in Illinois, which includes world-class high speed fiber internet to enhance overall quality of life and ensure rural prosperity throughout our service area.

To date, JCE has been awarded over $24M in grant funds from both state and federal programs such as USDA-RUS Community Connect and ReConnect Grant Programs, and the Connect Illinois Program to build out last mile fiber optic infrastructure. Collectively, these buildouts will provide much needed high speed internet services to over 3,500 rural homes, farms, and businesses with a focus on many more buildout areas to remaining unserved and underserved areas via applications from various grant funding programs, including NTIA's Broadband Equity, Access, and Deployment (BEAD) Program.

DPC's Tri-State Fiber Deployment Project would greatly benefit JCE, for the following reasons:

a. Access to new regional transport circuits providing more options for JCE to secure best value wholesale bandwidth costs through access to more major data centers. As a provider of the FCC's Affordable Connectivity Plan (ACP) and Lifeline Program, JCE understands the need to maintain affordable services. It is vital to have access to low-cost wholesale bandwidth to ensure long term affordable high-speed internet to our member consumers.

b. Access to new regional middle mile infrastructure will allow JCE to greatly improve overall reliability to its last mile network by interconnecting to larger, geographically diverse fiber rings. This will allow JCE's last mile network to provide the level of service required to attract and

support all types of last mile connections, especially businesses and those with critical uptime requirements.

c. Access to new regional middle mile infrastructure will allow JCE to have access to high-capacity circuits needed to interconnect a growing bandwidth demand, specifically the mobile cellular sector. JCE believes that a robust rural communications service area should include both future-proof Fiber-to-the-Premise and access to reliable mobile cellular coverage. Major cell carriers are now requesting up to 10 Gbps lit ethernet circuits at each tower that are only possible with interconnections to major data centers. Middle mile projects such as DPC's Tri-State Fiber Deployment Project help make this possible for rural providers like JCE.

d. Access to middle mile infrastructure such as DPC's Tri-State Fiber Deployment Project would demonstrate the significant value of utilizing a middle mile grant program to support last mile fiber systems made possible via other grant programs such as JCE's aforementioned USDA-RUS and Connect Illinois awarded projects. JCE truly understands the value of access to robust middle mile infrastructure. In fact, JCE currently has fifteen (15) points on its network that utilize middle mile fiber from a 2010 NTIA Broadband Technology Opportunity Program (BTOP) award to then lead applicant Northern Illinois University and now operated by iFiber.

Jo-Carroll Energy, Inc. (NFP) is fully cognizant of the significance of middle mile infrastructure to expand internet networks closer to unserved and underserved communities while offering equal opportunity for internet service providers to connect to last mile infrastructure in a cost-effective manner, ultimately promoting economic prosperity and closing the digital divide. DPC is committed to having a positive impact to the JCE service area and surrounding areas by implementing middle mile infrastructure that will increase competition among local internet service providers, and subsequently lower costs and offer increased options for rural citizens.

In this respect, we commit to interconnecting with DPC's Tri-State Fiber Deployment Project to effectively meet the needs of the community by providing reliable, affordable, high-speed broadband connection to all.

Sincerely,

Michael J. Casper
President & CEO
Jo-Carroll Energy, Inc. (NFP)