


FORM CD-450 (REV. 10/18)		U.S. DEPARTMENT OF COMMERCE		X GRANT		COOPERATIVE AGREEMENT	
FINANCIAL ASSISTANCE AWARD				FEDERAL AWARD ID NUMBER			
				13-40-MM531			
RECIPIENT NAME Dovetel Communications LLC				PERIOD OF PERFORMANCE 07/01/2023 - 06/30/2026			
STREET ADDRESS 1090 Pacific Avenue STE A				FEDERAL SHARE OF COST \$12,234,350.00			
CITY, STATE ZIP Bremen, GA 30110-2292				RECIPIENT SHARE OF COST \$20,012,223.54			
AUTHORITY 47 U.S.C. Sec. 1741				TOTAL ESTIMATED COST \$32,246,573.54			
CFDA NO. AND NAME 11.033 Middle Mile (Broadband) Grant Program							
PROJECT TITLE: West and Northwest Georgia Middle Mile Broadband Backbone							
<p>This Award Document (Form CD-450) signed by the Grants Officer constitutes an obligation of Federal funding. By signing this Form CD-450, the Recipient agrees to comply with the Award provisions checked below and attached. Upon acceptance by the Recipient, the Form CD-450 must be signed by an authorized representative of the Recipient and returned to the Grants Officer. If not signed and returned without modifications by the Recipient within 30 days of receipt, the Grants Officer may unilaterally withdraw this Award offer and de-obligate the funds.</p> <p>X DEPARTMENT OF COMMERCE FINANCIAL ASSISTANCE STANDARD TERMS AND CONDITIONS</p> <p>R & D AWARD</p> <p>FEDERAL-WIDE RESEARCH TERMS AND CONDITIONS, AS ADOPTED BY THE DEPT. OF COMMERCE</p> <p>X SPECIFIC AWARD CONDITIONS</p> <p>X LINE ITEM BUDGET</p> <p>X 2 CFR PART 200, UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS, AS ADOPTED PURSUANT TO 2 CFR § 1327.101</p> <p>X 48 CFR PART 31, CONTRACT COST PRINCIPLES AND PROCEDURES</p> <p>MULTI-YEAR AWARD. PLEASE SEE THE MULTI-YEAR SPECIFIC AWARD CONDITION.</p> <p>X OTHER(S): GENERAL TERMS AND CONDITIONS for the NTIA MIDDLE MILE GRANT PROGRAM, April 2023</p>							
SIGNATURE OF DEPARTMENT OF COMMERCE GRANTS OFFICER						DATE	
 DARREN OLSON Digitally signed by DARREN OLSON Date: 2023.06.15 08:31:27 -06'00'						Darren Olson Date: 2023.06.15 08:31:27 -06'00'	
PRINTED NAME, PRINTED TITLE, AND SIGNATURE OF AUTHORIZED RECIPIENT OFFICIAL						DATE	

Award Number: 13-40-MM531, Amendment Number 0

Federal Program Officer: Mike Tibodeau

Requisition Number: MM531

Employer Identification Number: 582654437

UEI Number: NJZHHJFLBLP4

Recipient ID:

Requestor ID:

Award ACCS Information

Bureau	FCFY	Project-Task	Organization	Object Class	Obligation Amount
61	2023	4720001-000	06-00-0000-00-00-00-00	41-19-00-00	\$12,234,350.00

Award Contact Information

Contact Type	Contact Name	Email	Phone
Administrative			



NIST Financial Assistance Award Number: 13-40-MM531

Amendment: NEW

Recipient: Dovetel Communications LLC

**NATIONAL INSTITUTE OF STANDARDS AND TECHNOLOGY
MIDDLE MILE GRANT PROGRAM
FINANCIAL ASSISTANCE
SPECIFIC AWARD CONDITIONS**

1. Introduction:

The National Institute of Standards and Technology (NIST), servicing for the National Telecommunications and Information Administration (NTIA), hereby enters into this Grant number 13-40-MM531 with Dovetel Communications, LLC to support the work described in the proposal entitled “West and Northwest Georgia Middle Mile Broadband Backbone” dated September 29, 2022 and April 10, 2023, which is hereby incorporated into this award by reference. Where the terms of this award and the proposal differ, the terms of this award shall prevail.

2. Recipient Contact Information:

Technical/Administrative:

[REDACTED]

CEO

Dovetel Communications, LLC

1090A Pacific Avenue

Bremen, GA 30110-2292

Telephone: [REDACTED]

Email: [REDACTED]

3. NTIA Contact Information:

Federal Program Officer

Mike Tibodeau

National Telecommunications and Information Administration

US Department of Commerce

1401 Constitution Ave., NW, Ste. 4078

Washington, DC 20230

Telephone: [REDACTED]

[REDACTED]

4. NIST Contact Information:

Grants Officer:

Andrew Rittgers

National Institute of Standards and Technology

325 Broadway

Boulder, CO 80305

Telephone: 303-497-7307

Email: andrew.rittgers@nist.gov

NIST Financial Assistance Award Number: 13-40-MM531

Amendment: NEW

Recipient: Dovetel Communications LLC

Grants Specialist:

Kelley Boatwright

National Institute of Standards and Technology

100 Bureau Drive, Mail Stop 1650

Gaithersburg, MD 20899-1650

Telephone: 301-975-4201

Email: kelly.boatwright@nist.gov

5. Award Payments:

This award is hereby funded through advanced payments using the Department of Treasury's Automated Standard Application for Payments (ASAP) system. Payments will be issued in accordance with 2 CFR § 200.305 and the Department of Commerce Financial Assistance Standard Terms and Conditions, B.02, dated November 12, 2020.

Payments for allowable costs may be drawn down as needed by the Recipient enrolled in ASAP. Funds may be requested through ASAP by the authorized *Payment Requestor* who is the individual designated by the Recipient to access Federal funds.

This award has the following control or withdrawal limits set in ASAP:

☐ None
☐ Agency Review required for all withdrawals (see explanation below)
☐ Agency Review required for all withdrawal requests over \$_____ (see explanation below)
☒ Maximum Draw Amount controls (see explanation below)
 \$_____ each month
 \$_____ each quarter
 \$0.00 Max drawdown amount

Explanation:

Environmental Assessment & National Historic Preservation Act Compliance Requirements restriction

The total amount of Federal funding is hereby withheld until the requirements identified in the National Institute of Standards and Technology General Terms and Conditions for the NTIA Middle Mile Grant Program, Term #11 – Environmental Assessment and #12 – National Historic Preservation Act (Six-Month Expenditure Plan), are satisfied.

6. Return Payments for Funds Withdrawn through ASAP:

Funds that have been withdrawn through ASAP may be returned to ASAP via the Automated Clearing House (ACH) or via FEDWIRE. The ACH or FEDWIRE transaction may only be completed by the Recipient's financial institution. Full or partial amounts of payments received by a Payment Requestor/Recipient Organization may be returned to ASAP. All funds returned to the ASAP system will be credited to the ASAP Suspense Account. The Suspense Account allows the Regional Financial Center to monitor returned items and ensure that funds are properly credited to the correct ASAP

account. Returned funds that cannot be identified and classified to an ASAP account will be dishonored and returned to the originating depository financial institution (ODFI). The Payment Requestor/Recipient Organization should notify the NIST Grants Office and provide a reason whenever return payments are made.

It is essential that the Payment Requestor/Recipient Organization provide its financial institution with ASAP account information (ALC, Recipient ID and Account ID) to which the return is to be credited. Additional detailed information is accessible at: <https://www.fiscal.treasury.gov/asap/>.

7. Period of Performance and Funding Limitations:

The period of performance and budget incorporated into this award cover a **3** year period of performance and provide for a maximum total amount of **\$12,234,350.00** in Federal funding. This award is being fully funded via this award action.

The maximum amount of NTIA funding in support of this award will not exceed the amount specified in the award documents, unless otherwise amended in writing by the NIST Grants Officer. The Department of Commerce is not liable for any obligations, expenditures, or commitments which involve any amount in excess of the Federal funds being made available pursuant to this award.

8. Federal and Non-Federal Cost Sharing:

As directed by Section 60401(f) of the Infrastructure Act, each recipient must commit to a non-federal cost share of no less than 30 percent of the total project cost, unless exempted through a partial or complete waiver for Tribal governments and Native entities.

Pursuant to this award, NIST hereby approves the committed non-federal cost share in the amount of \$20,012,223.54 per the proposal's budget on the part of the recipient and becomes a binding requirement under subject award (*see* 2 CFR §200). The cost sharing ratio for this award is **37.94%** Federal share and **62.06%** Non-Federal share. See 2 CFR §200.306 and Department of Commerce Financial Assistance Standard Terms and Conditions, Section B.03 for the treatment of cost sharing.

9. Letter of Credit and Opinion Letter

Pursuant to the NOFO, the recipient must submit an irrevocable standby letter of credit in a value of no less than 25% of the award amount. The recipient also must 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.

The recipient may obtain a new letter of credit or renew its existing letter of credit to reduce its value in accordance with the following limitations:

- Upon demonstrating to the satisfaction of the Assistant Secretary that it has completed the buildout of 40 percent of project miles, an eligible entity may obtain a new letter of credit or renew its existing letter of credit so that it is valued at no less than 20 percent of the award amount.
- Upon demonstrating to the satisfaction of the Assistant Secretary that it has completed the buildout of 60 percent of project miles, an eligible entity may obtain a new letter of credit or renew its existing letter of credit so that it is valued at no less than 15 percent of the award amount.
- Upon demonstrating to the satisfaction of the Assistant Secretary that it has completed the buildout of 80 percent of project miles, an eligible entity may obtain a new letter of credit or renew its existing letter of credit so that it is valued at no less than 10 percent of the award amount.

10. Notice of Funding Opportunity – Middle Mile Grant Program

The Department of Commerce, National Telecommunications Information Administration Notice of Funding Opportunity (NOFO) No. NTIA-MMG-2-2022, Middle Mile Grant Program, dated May 13, 2022, is incorporated by reference into this award. It is accessible at: <https://www.grants.gov/web/grants/view-opportunity.html?oppId=340300>. Select “Closed” or “Archived” Opportunity Status to view the NOFO.

11. Department of Commerce Pre-Award Notification Requirements for Grants and Cooperative Agreements:

The Department of Commerce Pre-Award Notification Requirements for Grants and Cooperative Agreements as published in the Federal Register on December 30, 2014 (79 FR 78390) is incorporated by reference into this award. It is accessible at: <http://www.gpo.gov/fdsys/pkg/FR-2014-12-30/pdf/2014-30297.pdf>.

12. Department of Commerce Financial Assistance Standard Terms and Conditions:

As indicated on the Form CD-450 for this award, the Department of Commerce Financial Assistance Standard Terms and Conditions (ST&C) issued November 12, 2020 are incorporated by reference into this award. The Department’s ST&C, as well as a link to 2 CFR Part 200, are accessible at: <https://www.commerce.gov/oam/policy/financial-assistance-policy>

13. Bi-annual Performance and Financial Reporting Requirements

The Recipient must submit a Federal Financial Report (SF-425), and Performance Progress Report on a semi-annual basis for the periods ending March 31 and September 30, or any portion thereof.

Reports are due no later than 30 calendar days following the end of each reporting period. A final SF-425 and Performance Progress Report (Closeout) must be submitted within 120 days after the expiration of the period of performance. Subrecipients are required to

NIST Financial Assistance Award Number: 13-40-MM531

Amendment: NEW

Recipient: Dovetel Communications LLC

submit their final performance report to the pass-through entity within 90 calendar days unless an extension has been granted.

All SF-425 and Performance Progress Reports must, at minimum, comply with the reporting requirements and contain all information and certifications specified in the NOFO.

All SF-425 and Performance Progress Reports must be submitted to the NTIA Grants Portal at <https://grants.ntia.gov/>, with copy to the Federal Program Officer, within the prescribed timeframes identified in the terms and conditions of the award.

The Recipient organization name, NIST award number, and reporting period must be included in the submission. The Recipient contact information should be included in the body of the message. To the greatest extent possible, SF-425 and Performance Progress Reports should be submitted together in the same submission.

SF-425 and Performance Progress Reports must not be sent directly to NIST/NTIA personnel, other than when copying the Federal Program Officer on submissions to the <https://grants.ntia.gov/> Portal.

Any SF-425 or Performance Progress Reports sent directly to NIST/NTIA personnel will be returned to the sender with instructions on how to submit through the <https://grants.ntia.gov/> Portal.

No other correspondence may be sent through this Portal; timely responses to any other inquiries received in this mailbox are not guaranteed. The Portal will not be used for any other purpose except for purposes identified above.

Eligible entities that receive an award shall comply with any other reasonable reporting requirements determined necessary by the NTIA Assistant Secretary.

**14. Department of Commerce Financial Assistance Standard Terms and Conditions
Section B.06 Indirect or Facilities and Administrative Costs:**

NIST will reimburse the Recipient for indirect or F&A costs in accordance with 2 C.F.R. § 200.414 and Section B.06. of the Department of Commerce Financial Assistance Standard Terms and Condition, dated November 12, 2020.

If an indirect cost rate has not been established, and NIST is identified as the cognizant agency for indirect costs in accordance with 2 C.F.R. § 200.1, “Cognizant agency for indirect costs,” within 90 calendar days of the award start date, the Recipient must electronically submit to gmdaudit@nist.gov the documentation (indirect cost rate proposal, cost allocation plan, etc.) necessary to allow NIST to perform an indirect cost rate proposal review. Organizations that have previously established indirect cost rates with NIST must submit a new indirect cost rate proposal for indirect costs within six months after the end of the organization’s fiscal year.

NIST Financial Assistance Award Number: 13-40-MM531

Amendment: NEW

Recipient: Dovetel Communications LLC

If your submission includes Personally Identifiable Information (PII) or Business Identifiable Information (BII), please send an email to gmdaudit@nist.gov to request a secure link.

The requirements for determining the relevant cognizant agency and for developing and submitting indirect (F&A) cost rate proposals and cost allocation plans are contained in 2 C.F.R. § 200.414 and in Appendices III-VII to 2 C.F.R. Part 200. For additional guidance on preparing indirect cost proposals, please review the Department of Labor's Guide for Indirect Cost Determination at: <https://www.dol.gov/oasam/boc/dcd/np-comm-guide.htm>. Section I.B and I.C lists the various types of indirect cost rates and the circumstances under which such rates would apply. The guide also addresses common indirect cost problems and contains useful FAQs.

15. Unfunded Grant Actions Mailbox (UGAM):

Requests for unfunded award actions, which include, but are not limited to, requests for no-cost extension, change in key personnel, change in scope of work, budget revisions, award transfer, and novation, must be submitted to: UGAM@nist.gov, within the prescribed timeframes identified in the terms and conditions of the award.

Unfunded award action requests and related correspondence, including justification to support the request, sent to the mailbox **must** contain the following information in the email subject line: (1) Recipient name; (2) NIST award number; (3) Principal Investigator/Project Director; and (4) Action being requested (e.g. no cost extension, change in key personnel, etc.).

Unfunded award action requests must not be sent directly to NIST personnel (e.g. Grants Specialist, Grants Officer, Administrative Assistant, GMD Division Chief, Federal Program Officer, etc.).

Any requests sent directly to NIST personnel will be returned to the sender with instructions on how to submit through the UGAM@nist.gov mailbox.

No other correspondence may be sent through this mailbox; timely responses to any other inquiries received in this mailbox are not guaranteed. The mailbox will not be used for any other purpose **except** for purposes identified above.

Requests that are processed will be authorized via a Form CD-451 Amendment to the Financial Assistance Award or a Non-Funded Administrative Change Letter.

16. Climate Resilience

Because retrofitted and new infrastructure for broadband might be expected to have a lifetime of 20 years or more, the Recipient must account not only for current risks but also for how the frequency, severity, and nature of these extreme events may plausibly evolve as our climate continues to change over the coming decades.

Accordingly, the recipient must develop a plan for regularly assessing the changing weather and climate risks that could impact the network. Such a plan must demonstrate that the risks are understood and characterized to account for and respond to these areas for the 20 years following deployment, utilizing at least one resource or tool at <https://toolkit.climate.gov/content/understanding-climate-risk-resources-ntia-applicants>. The plan should also detail how the weather and climate risks identified are addressed through avoidance and/or mitigation for the network. The plan should articulate how this process of evaluating the updated climate and weather risk and incorporating that information into the network design, maintenance, upgrades, or similar will be performed at least once during the period of performance and periodically over the life of the project.

The recipient is to report on its climate risk reanalysis in the biannual performance reports.

17. No Duplication of Federal Funding

No federal funds may be used to duplicate costs, services, connections, facilities, or equipment that have been authorized through another federal program. To the extent that a Middle Mile Program project is later deemed to include duplicate funding from another federal program, the NIST Grants Office and NTIA reserve the right to disallow the costs associated with the duplication of federal funds or service and/or to reallocate the funds to allowable activities within the project.

18. Signage and Public Acknowledgements:

The Recipient is required to post project signage and to include public acknowledgments in published and other collateral materials (e.g., press releases, marketing materials, webpages, plaques) satisfactory in form and substance to NIST, that identifies the nature of the project and indicates that “the project is funded by the Bipartisan Infrastructure Act. The Recipient employing project signage is required to use the official Investing in America emblem in accordance with the Official Investing in America Emblem Style Guide: <https://www.whitehouse.gov/wp-content/uploads/2023/02/Investing-in-America-Brand-Guide.pdf>. Costs associated with signage and public acknowledgments must be reasonable and limited. Signs or public acknowledgments should not be produced, displayed or published if doing so results in unreasonable cost, expense, or recipient burden. The Recipient is encouraged to use recycled or recovered materials when procuring signs. Any construction site signage should be displayed throughout the construction phase of the project in an easily visible location directly linked to the work taking place. The Recipient is responsible to maintain the signage in good condition throughout the construction period.

19. Pre-Award Costs:

Pre-award costs in the amount of \$50,000 are acceptable only to the extent of reimbursing reasonable pre-application expenses, which include expenses related to preparing an application that are incurred after the publication date of the subject NOFO

NIST Financial Assistance Award Number: 13-40-MM531

Amendment: NEW

Recipient: Dovetel Communications LLC

and prior to the date of issuance of this grant award, except the lobbying costs and contingency fees are not reimbursable. The approved pre-award costs are a portion of, **not in addition to**, the approved total budget.

Pre-award costs are approved for the period 05/13/2022 through 06/30/2023.

20. Equipment:

A. Estimated Useful Life and Compliance with 2 C.F.R. § 200.313. For purposes of this award, the estimated useful life of the equipment to be acquired by the recipient varies from the date that such equipment is placed into service on the project. Additional useful life guidance will be forthcoming. During the estimated useful life of the equipment, the recipient must adhere to the requirements contained in the terms and conditions of the award, including adherence to the use, management, and disposition requirements set forth in 2 C.F.R. § 200.313.

B. UCC-1 Filing & Attorney's Certification. Pursuant to 2 C.F.R. § 200.316, within 30 calendar days of acquiring all or any portion of the equipment under this award, the recipient shall properly file a UCC-1 with the appropriate State office where the equipment will be located in accordance with the State's Uniform Commercial Code (UCC). The UCC filing(s) must include the below or substantively similar language providing public notice of the Federal Interest in the equipment acquired with NTIA Middle Mile funding. Also, a clear and accurate inventory of the subject equipment must be attached to and filed with the UCC-1.

The Equipment set forth at Attachment A hereto was acquired with funding under a financial assistance award (Award Number 13-40-MM531) issued by the National Institute of Standards and Technology, U.S. Department of Commerce. As such, the U.S. Department of Commerce retains an undivided equitable reversionary interest (Federal Interest) in the Equipment for the estimated useful life thereof, from when the equipment is placed into service on the project.

In addition, within 15 calendar days following the required UCC filing(s), the recipient must be ready if requested by the Grants Officer to provide the Grants Officer with complete and certified copies of the filed UCC forms and attachments for the equipment acquired with NTIA Middle Mile funding, along with a certification from legal counsel, licensed by the State within which the filings were made (Attorney's Certification), that the UCC filing was properly executed and filed in accordance with applicable state law. The Attorney's Certification must include the below or substantively similar language:

NIST Award Number: 13-40-MM531

Pursuant to 28 U.S.C. § 1746, I hereby certify as follows:

I am legal counsel at _____.

NIST Financial Assistance Award Number: 13-40-MM531

Amendment: NEW

Recipient: Dovetel Communications LLC

I am licensed to practice law in the State of _____ having been a license holder of said state and in good standing since _____.

Attached hereto is a certified copy of UCC-1 form(s) reflecting that this document was filed in the _____ on _____, 202x, bearing the following filing information [insert filing data, e.g., instrument number, etc.] and consists of _____ recorded pages as certified by the Secretary of State of _____.

I certify that this UCC-1 form(s) has/have been validly executed and properly recorded as noted above.

I certify under the penalty of perjury that the foregoing is true and correct.

Executed on this _____ day of _____.

(Attorney name and title)

(Address and phone number)

In addition, during the estimated useful life of the equipment, the recipient is hereby authorized and directed by the Grants Officer to timely file any necessary UCC-3 continuation statements (or other filings) for the subject equipment consistent with the requirements set forth in this specific award condition. If requested by the Grants Officer, copies of all filed UCC continuation statements, together with an Attorney's Certification, must be submitted to the Grants Officer within 15 calendar days following each such filing. The UCC filing(s) and the accompanying Attorney's Certification(s) must be acceptable in form and in substance to the NIST Grants Officer. If the Grants Officer does not request the UCC filing(s) and Attorney's Certification, the recipient must continue to maintain records of the filing(s) and Attorney's Certification in compliance with 2 CFR § 200.334 Retention requirements for records.

End of Specific Award Conditions

**U.S. DEPARTMENT OF COMMERCE
NATIONAL INSTITUTE OF STANDARDS AND TECHNOLOGY
GENERAL TERMS AND CONDITIONS
for the
NTIA MIDDLE MILE GRANT PROGRAM**

April 2023

Table of Contents

1. Project Management Conference
2. Property Trust Relationship and Public Notice Filings for Grant-Acquired Property
3. Land, Easements, and Rights of Way
4. Project Sign
5. Eminent Domain
6. Construction Contract Security Bond
7. Inspection and Testing of Materials
8. Energy Efficiency
9. Requirements During Construction
10. Recipient and Contractor Compliance with Applicable Requirements
11. Environmental Assessment
12. National Historic Preservation Act
13. Tribal Employment Rights Ordinances
14. Scheduling Inspection for Final Acceptance
15. Build America, Buy America – Required Use of Domestic Fiber Optic Glass and Fiber Optic Cable
16. Contracting with Small and Minority Businesses, Women’s Business Enterprises, and Labor Surplus Area Firms
17. Open Network Requirements
18. Prohibition on Use for Covered Communications Equipment or Services
19. Prevention of Waste, Fraud, and Abuse
20. Protection of Whistleblowers

1. Project Management Conference

Shortly after approval of the award, NIST (on behalf of NTIA) may contact the Recipient to arrange a project management conference. The purpose of the project management conference is to explain to the Recipient its post-approval responsibilities for administration of the award, including its responsibilities with respect to the Terms and Conditions of the award and applicable Federal requirements. The Recipient's authorized representative, architect/engineer, financial representative, and possibly the Recipient's legal counsel should attend.

2. Property Trust Relationship and Public Notice Filings for Grant-Acquired Property

In accordance with 2 CFR § 200.316 (Property trust relationship), real property, equipment, and intangible property, that are acquired or improved with a Federal award must be held in trust by the non-Federal entity (*i.e.*, Recipient or Subrecipient) as trustee for the beneficiaries of the project or program under which the property was acquired or improved. This trust relationship exists throughout the duration of the property's estimated useful life, as determined by the Grants Officer in consultation with the Program Office, during which time the Federal Government retains an undivided, equitable reversionary interest in the property (Federal Interest). The non-Federal entity must comply with all use and disposition requirements and restrictions as set forth in 2 C.F.R. §§ 200.310 (Insurance coverage) through 200.316 (Property trust relationship), as applicable, and in the terms and conditions of the Federal award.

The Grants Officer may require a non-Federal entity (*i.e.*, a Recipient or Subrecipient) to execute and to record (as applicable) a statement of interest, financing statement (Form UCC-1), lien, mortgage or other public notice of record to indicate that real or personal property acquired or improved in whole or in part pursuant to a Middle Mile Grant Program award is subject to the Federal Interest, and that certain use and disposition requirements apply to the property. The statement of interest, financing statement (Form UCC-1), lien, mortgage or other public notice must be acceptable in form and substance to NTIA and to the NIST Grants Officer and must be placed on record in accordance with applicable State and local law, with continuances re-filed as appropriate. In such cases, the NIST Grants Officer may further require the non-Federal entity to provide NTIA and the NIST Grants Officer with a written statement from a licensed attorney in the jurisdiction where the property is located, certifying that the Federal Interest has been protected, as required under the award and in accordance with applicable State and local law. The attorney's statement, along with a copy of the instrument reflecting the recordation of the Federal Interest, must be promptly returned to the Grants Officer. The non-Federal entity may use model documentation made available by NTIA.

Without releasing or excusing the non-Federal entity from these obligations, the non-Federal entity, by execution of the financial assistance award or by expending Federal financial assistance funds (in the case of a subrecipient), authorizes NTIA and/or the NIST Grants Officer to file such notices and continuations as it determines to be necessary or convenient to disclose and protect the Federal Interest in the property. The NIST Grants Officer may elect not to release any or a portion of the Federal award funds until the non-Federal entity has complied with this provision and any other applicable award terms or conditions, unless other arrangements satisfactory to the NIST Grants Officer are made.

3. **Land, Easements, and Rights of Way**

The Recipient must disclose all encumbrances to NIST. NIST will not accept any encumbrance that interferes with the construction, intended use, operation, or maintenance of the project during its estimated useful life.

4. **Project Sign**

The Recipient is responsible for constructing, erecting, and maintaining in good condition throughout the construction phase of the project a sign(s) satisfactory to NIST that identifies the project and indicates that the project is Federally funded. The sign shall:

- Be designed in accordance with the guidelines and design specifications found in the Building A Better America Brand Guide found here: <https://www.whitehouse.gov/wp-content/uploads/2022/08/Building-A-Better-America-Brand-Guide.pdf>
- Be placed in an easily visible location that can be directly linked to the work taking place; and,
- Identify the project as a “project funded by President Biden’s Bipartisan Infrastructure Law.”

The recipient should use best effort to use recycled or recovered materials when procuring signs. The recipient shall also ensure costs associated with signage are reasonable and limited,

NIST also may require that the Recipient maintain a permanent plaque or sign at the project site with the same or similar information.

5. **Eminent Domain**

In accordance with Executive Order 13406, “*Protecting the Property Rights of the American People*” (June 28, 2006), the Recipient agrees:

- (a) Not to use any power of eminent domain available to the Recipient (including the commencement of eminent domain proceedings) for use in connection with the Project for the purpose of advancing the economic interests of private parties;
- (b) Not to accept title to land, easements, or other interest in land acquired by the use of any power of eminent domain for use in connection with the Project for such purposes; and
- (c) Any use of the power of eminent domain to acquire land, easements or interests in land, whether by the Recipient or any other entity that has the power of eminent domain, in connection with the Project without prior written consent of NIST constitutes an unauthorized activity and/or use of funds under the award, and subjects the recipient to appropriate enforcement action by the Grants Officer, including but not limited to the disallowance of award costs and the termination of an award.

6. Construction Contract Security Bond

Pursuant to 2 CFR § 200.326, for construction or facility improvement contracts or subcontracts exceeding the Simplified Acquisition Threshold (currently \$250,000), the Recipient may submit its bonding policy and requirements to the Grants Officer for a determination whether the Federal Government's interest is adequately protected. If such a determination has not been made, the minimum bonding requirements of 2 CFR § 200.326 (Bonding requirements) shall apply.

7. Inspection And Testing of Materials

The Recipient shall ensure that all materials and equipment used in the completion of the work shall be subject to adequate inspection and testing in accordance with accepted standards. Materials of construction, particularly those upon which the strength and durability of any structure may depend, shall be subject to inspection and testing to establish conformance with specifications and suitability for intended uses. The Recipient shall ensure that documentation of same is cataloged and retained.

8. Energy Efficiency

The Recipient shall apply, where feasible, sustainable, and energy efficient, design principles for the purpose of reducing pollution and energy costs and optimizing lifecycle costs associated with the construction.

9. Requirements During Construction

During construction, the Recipient is responsible for:

- (a) Ensuring project completion in accordance with approved plans and specifications;
- (b) Monitoring project progress and reporting progress to NTIA and NIST;
- (c) Providing for required construction permits and adequate construction inspection;
- (d) Promptly paying costs incurred for the project purposes;
- (e) Monitoring contractors' compliance with Federal, State, and local requirements; and
- (f) Constructing and maintaining in good condition throughout the construction period, of a sign or signs, at the project site in a conspicuous place indicating that the Federal Government is participating in the project.

10. Recipient and Contractor Compliance with Applicable Requirements

The Recipient shall comply, and must require each subrecipient or contractor, including lower tier subrecipients or subcontractors, to comply with all applicable Federal, state, and local laws and regulations. The Recipient is responsible for ensuring that all contracts necessary for design and construction of the Project facilities are implemented in compliance with the Terms and Conditions of this Award.

11. Environmental Assessment

The Recipient must comply with all environmental standards and identify to NTIA any impact a proposed infrastructure project may have on the environment. The Recipient may not expend

any federal infrastructure funds other than for engineering design, permitting and work related to environmental, historical and cultural reviews, and limited, preliminary procurement funds, as described below, prior to the following:

- The completion of environmental review and issuance of a Categorical Exclusion (Cat Ex) Decision Memo, Record of Consideration (REC), Finding of No Significant Impact (FONSI), or Record of Decision (ROD) (hereinafter “decision documents”) that meets the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4321, *et seq.*);
- The completion of any required consultations, to include consultations with the State Historic Preservation Office (SHPO) and the appropriate federally recognized Native American tribes, under Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470, *et seq.*) (NHPA), and/or consultations with the U.S. Fish and Wildlife Service (USFWS) under Section 7 of the Endangered Species Act (16 U.S.C. 1531, *et seq.*), and/or consultations with the U.S. Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act (33 U.S.C. 1251, *et seq.*); and/or
- Demonstration of compliance with all other applicable federal, state, and local environmental laws and regulations.

Project implementation (site preparation, demolition, construction, ground disturbance, or any other project implementation activities) may not begin prior to the completion of the above activities. The completion of a draft environmental assessment (EA) or equivalent document, and completion of any required consultations under Section 106 of the NHPA, must be completed no later than six months after the award date unless a formal request for extension is submitted and approved by the Grants Officer. The Recipient must comply with all conditions placed on the project as the result of consultation processes.

Subject to the Grants Officer’s approval of the Recipient’s 6-month expenditure plan (described below), the allowable use of award funds prior to beginning project implementation includes, but is not limited to, activities necessary for the completion of the following:

- Pre-construction project planning, including collecting environmentally-related information;
- Applications for environmental permits;
- Studies such as an Environmental Assessment (EA), and any wetland delineations, biological assessments, archaeological surveys, or other required analyses;
- Administrative costs;
- Pre-award application costs; and/or
- Required consultation activities.

The allowable use of funds for limited, preliminary procurements prior to beginning project implementation includes, but is not limited to, the initiation of activities necessary to meet the project completion requirements as specified in the award, including the following:

- Purchase or lease of equipment, or entering into binding contracts to do so;

- Purchase of applicable or conditional insurance; and/or
- Funds used to secure land or building leases, including right-of-way easements.

The allowable use of preliminary procurement funds is limited; must not result in an irrevocable commitment of resources; and is only allowed after inclusion in and approval of an initial 6-month expenditure plan. The initial 6-month expenditure plan is due in advance of any infrastructure funds draw down from ASAP and will be reviewed by the Federal Program Officer, who will make recommendations to the Grants Officer (who has final approval authority) to ensure all proposed procurement funds are reasonable and necessary to ensure that the project completion deadline requirements are met. All contracts must contain early termination clauses with termination costs clearly specified. All equipment purchased or leased in advance of project implementation and before issuance of the decision documents and completion of applicable consultations must be stored in locations other than the proposed project site and where there will be no impact to the environment, human health, or cultural resources (in most cases, this means equipment must be stored in existing warehouses). Under no circumstances will grant funds be drawn down for clearing or excavating land, or demolition or construction of buildings or towers, before all environmental SACs are completed and cleared. This limited, preliminary allowable use of funds for purchases and leases is designed for recipient flexibility and to streamline preparation for project implementation simultaneously during environmental review and conducting of consultations; the clause, and all applicable restrictions, is lifted once the decision document and applicable consultations are complete and approved.

While this SAC is in effect, the Recipient shall submit, in advance of any drawdowns of funds from ASAP, an initial 6-month expenditure plan that presents the proposed planning and design activities and limited, preliminary procurement activities and costs. The initial 6-month expenditure plan will be submitted via email to the Federal Program Officer, who will review it and provide recommendations to the Grants Officer for final approval to ensure that the proposed activities and expenditures are reasonable and necessary in the context of environmental compliance. The Federal Program Officer must review and recommend, and the Grants Officer must approve the initial 6-month expenditure plan prior to fund drawdowns through ASAP.

The completion of a draft EA will be submitted via email to the Environmental Federal Program Officer and Federal Program Officer. Once the environmental review has been completed, NTIA will review all documentation and determine whether the review sufficiently addresses all resource areas and whether the project may qualify for approval decision. Projects found to have significant impacts to environmental or historic resources may face de-obligation of funding if impacts cannot be mitigated. The Recipient is required to provide any information requested by NTIA to ensure both initial and ongoing compliance with environmental and historic preservation laws, regulations, and best practices. The Recipient shall notify NTIA within 24 hours upon receipt of any notices of foreclosure; notices for continuing consultation received from the SHPO, Tribal Historic Preservation Office (THPO), USFWS, or other consulting party; or notices of noncompliance received from consulting authorities or regulatory agencies.

Any change to the approved project scope that has the potential for altering the nature or extent of environmental or cultural resources impacts must be brought to the attention of NTIA and will be re-evaluated for compliance with applicable regulatory requirements.

For all ground disturbing activities that occur during project implementation in the vicinity of known archaeological sites or suspected or known burials, the Recipient must ensure that an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards monitors ground disturbance, and if any potential archeological resources or buried human remains are discovered, then the Recipient must immediately cease construction in that area and notify NTIA and the interested SHPO, THPO, and tribes. Such construction activities may then only continue with the written approval of NTIA.

A revised 6-month expenditure plan is due within 30 days of submitting a FONSI to NTIA. The revised 6-month expenditure plan must outline how the Recipient plans on expending the remaining budget costs related to construction-type activities. This plan should be submitted via email to the Federal Program Officer who will review it and provide recommendations to the Grants Officer for final approval to ensure that the proposed activities and expenditures are reasonable and necessary. The Federal Program Officer must review and recommend, and the Grants Officer must approve, the revised 6-month expenditure plan prior to fund drawdowns through ASAP.

12. National Historic Preservation Act

The Recipient may not expend any federal infrastructure funds other than for engineering design, permitting and work related to environmental, historical and cultural reviews, and limited, preliminary procurement funds prior to the following:

- The completion of any required consultations, to include consultations with the State Historic Preservation Officer (SHPO) and the appropriate federally recognized Native American tribes, under Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470, *et seq.*) (NHPA); and/or
- Demonstration of compliance with all other applicable Federal, State, and local environmental laws and regulations.

Project implementation (site preparation, demolition, construction, ground disturbance, or any other project implementation activities) may not begin prior to the completion of the above activities. The completion of any required consultations under Section 106 of the NHPA must be completed no later than six months after the award date unless a formal request for extension is submitted and approved by the Grants Officer. The Recipient must comply with all conditions placed on the project as the result of consultation processes.

Subject to the Grants Officer's approval of the Recipient's 6-month expenditure plan (described below), the allowable use of funds for planning and design activities prior to beginning project implementation includes, but is not limited to, activities necessary for the completion of the following:

- Pre-construction project planning, including collecting culturally-related information;

- Applications for cultural resource approvals and/or permits;
- Studies and any archaeological, architectural history, or traditional cultural property surveys, or other required analyses;
- Administrative costs;
- Pre-award application costs; and/or
- Required consultation activities.

The allowable use of funds for limited, preliminary procurements prior to beginning project implementation includes, but is not limited to, the initiation of activities necessary to meet the project completion requirements as specified in the award, including the following:

- Purchase or lease of equipment, or entering into binding contracts to do so;
- Purchase of applicable or conditional insurance; and/or;
- Funds used to secure land or building leases, including right-of-way easements.

While this SAC is in effect, the Recipient shall submit, in advance of any drawdowns of funds from ASAP, an initial 6-month expenditure plan that presents the proposed planning and design activities and limited, preliminary procurement activities and costs. The initial 6-month expenditure plan will be submitted via email to the Federal Program Officer, who will review it and provide recommendations to the Grants Officer for final approval to ensure that the proposed activities and expenditures are reasonable and necessary in the context of environmental compliance. The Federal Program Officer must review and recommend, and the Grants Officer must approve the initial 6-month expenditure plan prior to fund drawdowns through ASAP.

The allowable use of preliminary procurement funds is limited; must not result in an irrevocable commitment of resources; and is only allowed after inclusion in and approval of an initial 6-month expenditure plan. The initial 6-month expenditure plan is due in advance of any infrastructure funds draw down from ASAP and will be reviewed by the Federal Program Officer, who will make recommendations to the Grants Officer (who has final approval authority) to ensure all proposed procurement funds are reasonable and necessary to ensure that the project completion deadline requirements are met. All contracts must contain early termination clauses with termination costs clearly specified. All equipment purchased or leased in advance of project implementation and before completion of applicable consultations must be stored in locations other than the proposed project site and where there will be no impact to the environment, human health, or cultural resources (in most cases, this means equipment must be stored in existing warehouses). Under no circumstances will grant funds be drawn down for clearing or excavating land, or demolition or construction, before all environmental SACs are completed and cleared. This limited, preliminary allowable use of funds for purchases and leases is designed for recipient flexibility and to streamline preparation for project implementation simultaneously during consultations; the clause, and all applicable restrictions, is lifted once the applicable consultations are complete, and decision document is issued.

Consultation documentation will be submitted via email to the Environmental Federal Program Officer and Federal Program Officer. Once the consultation activities have been completed, NTIA will review all documentation and determine whether the consultation activities sufficiently address historical and/or cultural resource impacts. Projects found to have

significant impacts to environmental or historic resources may face de-obligation of funding if impacts cannot be mitigated. The Recipient is required to provide any information requested by NTIA to ensure both initial and ongoing compliance with environmental and historic preservation laws, regulations, and best practices. The Recipient shall notify NTIA within 24 hours upon receipt of any notices of foreclosure; notices for continuing consultation received from the SHPO, Tribal Historic Preservation Officer (THPO), or other consulting party; or notices of noncompliance received from consulting authorities or regulatory agencies.

For all ground disturbing activities that occur during project implementation in the vicinity of known archaeological sites or suspected or known burials, the Recipient must ensure that an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards monitors ground disturbance, and if any potential archeological resources or buried human remains are discovered, then the Recipient must immediately cease construction in that area and notify NTIA and the interested SHPO, THPO, and tribes. Such construction activities may then only continue with the written approval of NTIA.

Any change to the approved project scope that has the potential for altering the nature or extent of cultural resources impacts must be brought to the attention of NTIA and will be re-evaluated for compliance with applicable regulatory requirements.

A revised 6-month expenditure plan is due within 30 days of submitting a FONSI to NTIA. The revised 6-month expenditure plan must outline how the Recipient plans on expending the remaining budget costs related to construction-type activities. This plan should be submitted via email to the Federal Program Officer who will review it and provide recommendations to the Grants Officer for final approval to ensure that the proposed activities and expenditures are reasonable and necessary. The Federal Program Officer must review and recommend, and the Grants Officer must approve, the revised 6-month expenditure plan prior to fund drawdowns through ASAP.

13. Tribal Employment Rights Ordinances

In accordance with Departmental policy, NIST must recognize Tribal Employment Rights Ordinances (TEROs), which may provide for preferences in contracting and employment, in connection with its financial assistance awards. Tribal ordinances requiring preference in contracting, hiring, and firing and the payment of a TERO fee are allowable provisions under Federal awards and is incorporated by NTIA into Middle Mile Grant Program grants with Native American/Alaska Native/Native Hawaiian entities. The payment of the TERO fee, which supports the tribal employment rights office to administer the preferences, should generally be allowable as an expense that is "necessary and reasonable for proper and efficient performance and administration" of an award, as provided under as provided under 2 CFR § 200.403.

14. Scheduling Inspection for Final Acceptance

The Recipient will schedule its final inspection when all construction has been completed, the architect/engineer has conducted its own final inspection, and any deficiencies have been corrected. Representatives of the Recipient, the architect/engineer, and the contractor(s) will make the Recipient's final inspection. NTIA must be given advance notice of the final inspection so that a representative of NTIA may participate.

15. Build America, Buy America – Required Use of Domestic Fiber Optic Glass and Fiber Optic Cable

A. Applicability & Scope: Pursuant to the Infrastructure Investment and Jobs Act, 2021, Pub. L. No. 117-58, 135 Stat. 429 (Nov. 15, 2021) (IIJA) including the Build America, Buy America Act, Pub. L. No. 117-58, §§ 70901-52 (BABA), as well as guidance provided by Memorandum for Heads of Executive Departments and Agencies, Initial Implementation Guidance on Application of Buy America Preference in Federal Financial Assistance Programs for Infrastructure, Executive Office of the President, Office of Management and Budget (April 18, 2022) (OMB M-22-11), recipients of a federal financial assistance award from the U.S. Department of Commerce (DoC) are hereby notified that none of the funds provided under this award may be used for a Middle Mile (MM) infrastructure project unless all of the fiber optic glass and fiber optic cable used in the project is produced in the United States. The Buy America domestic content procurement preference only applies to fiber optic glass and to fiber optic cable that are consumed in, incorporated into, or affixed to a MM infrastructure project. As applicable, the requirements of this subsection must be included in all subawards and contracts, including all contracts and purchase orders for work or products pursuant to this program.

B. Waivers: When necessary, recipients may apply for, and DoC may grant, a waiver from the Buy America domestic content procurement preference applicable to MM awards. When DoC has made a determination that one of the following exceptions applies, the awarding official may waive the application of the Buy America domestic content procurement preference in any case in which DoC determines that:

- 1) applying the Buy America domestic content procurement preference to the fiber optic glass and/or fiber optic cable needed for the MM project would be inconsistent with the public interest;
- 2) the fiber optic glass and/or fiber optic cable needed for the MM project are not produced in the United States in sufficient and reasonably available quantities or of a satisfactory quality; or
- 3) the inclusion of fiber optic glass and/or fiber optic cable needed for the MM project and produced in the United States will increase the cost of the overall project by more than 25 percent.

A request to waive the application of the Buy America domestic content procurement preference must be submitted in writing. The NTIA Federal Program Officer will provide instructions on the format, contents, and supporting materials required for any waiver request. Waiver requests are subject to public comment periods of no less than 15 days and must be reviewed by the Office of Management and Budget Made in America Office. There may be instances where an award qualifies, in whole or in part, for an existing waiver accessible at: <https://www.whitehouse.gov/omb/management/made-in-america/build-america-buy-america-act-federal-financial-assistance/>.

Please note that NTIA has waived the Buy America domestic content procurement preference requirement for all iron, steel, manufactured products, and construction

materials used in MM infrastructure projects, with the exceptions of fiber optic glass and fiber optic cable. See *Limited Applicability Nonavailability Waiver of the Buy America Domestic Content Procurement Preference as Applied to Recipients of Middle Mile Grant Program Awards*, which was issued by the Assistant Secretary of Commerce for Communications and Information on April 18, 2023 and is accessible at: <https://www.commerce.gov/oam/build-america-buy-america>.

Notwithstanding the NTIA waiver and excepting fiber optic glass and fiber optic cable used in a MM project, the Recipient should, as appropriate and consistent with law and to the greatest extent practicable, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States (including, but not limited to, iron, aluminum, steel, cement, and other manufactured products). As applicable, the requirements of this subsection must be included in all subawards, including all contracts and purchase orders for work or products pursuant to this program. See 2 CFR § 200.322, *Domestic preference for procurements*.

C. Definitions:

“Construction materials” includes an article, material, or supply—other than an item of primarily iron or steel; a manufactured product; cement and cementitious materials; aggregates such as stone, sand, or gravel; or aggregate binding agents or additives¹—that is or consists primarily of:

- non-ferrous metals;
- plastic and polymer-based products (including polyvinylchloride, composite building materials, and polymers used in fiber optic cables);
- glass (including optic glass);
- lumber; or
- drywall.

In the case of construction materials, all manufacturing processes for the construction material must have occurred in the United States.²

“Domestic content procurement preference” means all iron and steel used in the project are produced in the United States; the manufactured products used in the project are produced in the United States; or the construction materials used in the project are produced in the United States.

“Infrastructure” includes, at a minimum, the structures, facilities, and equipment for, in the United States, roads, highways, and bridges; public transportation; dams, ports, harbors, and other maritime facilities; intercity passenger and freight railroads; freight and intermodal facilities; airports; water systems, including drinking water and wastewater systems; electrical transmission facilities and systems; utilities; broadband infrastructure;

¹ IJA, § 70917(c)(1).

² *Id.* at § 70912(6)(C).

and buildings and real property. Infrastructure includes facilities that generate, transport, and distribute energy.

“Project” means the construction, alteration, maintenance, or repair of infrastructure in the United States.

D. Recordkeeping and Reporting: In accord with 2 C.F.R. § 200.334, *Retention requirements for records*, the recipient is required to maintain detailed records pertinent to a MM award, including financial records, procurement records, and real property/equipment records. In this connection, the recipient is required to maintain detailed records concerning the acquisition of all iron, steel, manufactured products, and construction materials used in MM projects. For fiber optic glass and fiber optic cable used in a MM project, this includes but is not limited to the: acquisition date; acquisition price; verification of domestic sourcing (unless DoC issues a waiver); how it was used in the project; and current location. Additionally, the recipient is required to maintain detailed records concerning the acquisition of iron, steel, manufactured products, and construction materials from foreign sources that are used in a MM project, including but not limited to: acquisition date; acquisition price; efforts to source domestically; foreign source(s); how it was used in the project; and current location. NTIA may require the recipient to report such information to the Agency at a time and in the format specified by the NTIA Federal Program Officer.

E. Questions: Questions concerning the Buy America domestic content procurement preference requirements applicable to MM awards should be addressed to the NTIA Federal Program Officer.

16. Contracting with Small and Minority Businesses, Women’s Business Enterprises, and Labor Surplus Area Firms

Pursuant to 2 CFR § 200.321, the Recipient and its subrecipients must take all necessary affirmative steps (as described in 2 CFR § 200.321) to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible.

17. Open Network Requirements

The Recipient must comply with NTIA’s open network requirements, which allows all other broadband service providers to interconnect with networks and other broadband infrastructure deployed using funds from this grant program on fair and non-discriminatory terms and conditions. The requirement to interconnect will apply to Recipients that deploy middle mile networks or submarine cable landing stations and not last mile networks.

- **Interconnection**: Recipients shall allow interconnection in perpetuity to grant-funded facilities at any technically feasible point along the network (without exceeding current or reasonably anticipated capacity limitations). This duty includes, at a minimum, the physical interconnection of the Recipient’s facilities to a requesting party’s facilities for the exchange of traffic. In addition, Recipients shall connect to the public Internet directly or indirectly and provide requesting parties with an ability to connect to the

Internet. Rates and terms for interconnection shall be reasonable and nondiscriminatory.

- **Negotiate in Good Faith:** Recipients shall negotiate in good faith with all requesting parties (*i.e.*, public, private, non-profit, or other parties) making a bona fide request for interconnection or wholesale services.
- **Wholesale Broadband Service:** NTIA encourages Recipients to offer wholesale broadband services at rates and terms that are reasonable and nondiscriminatory

18. Prohibition on Use for Covered Communications Equipment or Services

A Recipient or subrecipient may not use grant funds received under the Middle Mile Grant Program to purchase or support any covered communications equipment or service (as defined in section 9 of the Secure and Trusted Communications Networks Act of 2019 (47 U.S.C. 1608)). *See also* 2 C.F.R. 200.216 (Prohibition on certain telecommunications and video surveillance services or equipment), which also applies to this award.

19. Prevention of Waste, Fraud, and Abuse

Consistent with the principles in 2 CFR part 200, at any time(s) during the grant period of performance, NTIA may direct a Recipient's key personnel to take a Government-provided training on preventing waste, fraud and abuse. Key personnel include those responsible for managing the Recipient's finances and overseeing any contractors, sub-contractors or sub-recipients (for financial matters and/or general oversight related to the grant). NTIA will provide instructions on when and how to take such training(s), and costs incurred by a Recipient relative to the training (*e.g.*, staff time) are eligible for reimbursement pursuant to the NTIA award.

Further, recipients must monitor award activities for common fraud schemes, including but not limited to:

- false claims for materials and labor;
- bribes related to the acquisition of materials and labor;
- product substitution;
- mismarking or mislabeling on products and materials; and
- time and materials overcharging.

Should a Recipient detect any fraud schemes or any other suspicious activity, the grant recipient must contact its assigned NTIA Federal Program Officer and the Department of Commerce, Office of Inspector General Hotline, as indicated at <https://www.oig.doc.gov/Pages/Contact-Us.aspx>, as soon as possible. Additionally, in accordance with 2 CFR § 200.113, an applicant or recipient must disclose, in a timely manner, in writing to the Federal awarding agency or pass-through entity all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Non-Federal entities that have received a Federal award are required to report certain civil, criminal, or administrative proceedings to SAM.gov. Failure to make required disclosures can result in any of the remedies described in Section 200.339. (*See also* 2 CFR Part 180, 31 U.S.C. § 3321, and 41 U.S.C. § 2313.)

20. Protection of Whistleblowers

The Department of Commerce Financial Assistance Standard Terms and Conditions are incorporated into every NTIA grant award. Section F.05 of these Terms and Conditions states that each award is subject to the whistleblower protections afforded by 41 U.S.C. § 4712 (Enhancement of contractor protection from reprisal for disclosure of certain information).

Generally, this law provides that an employee or contractor (including subcontractors and personal services contractors) of a non-Federal entity may not be discharged, demoted, or otherwise discriminated against as a reprisal for disclosing to a person or body information that the employee reasonably believes is evidence of gross mismanagement of a Federal award, subaward, or a contract under a Federal award or subaward, a gross waste of Federal funds, an abuse of authority relating to a Federal award or subaward or contract under a Federal award or subaward, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a Federal award, subaward, or contract under a Federal award or subaward.

Non-Federal entities and contractors under Federal awards and subawards must inform their employees in writing of the rights and remedies provided under 41 U.S.C. § 4712, in the predominant native language of the workforce.

A person that believes they have been the subject of retaliation for protected whistleblowing can contact the Department of Commerce, Office of Inspector General Hotline, as indicated at <https://www.oig.doc.gov/Pages/Hotline.aspx>, or the U.S. Office of Special Counsel, toll free at 1-800-872-9855.

CERTIFICATION REGARDING LOBBYING

Applicants should also review the instructions for certification included in the regulations before completing this form. Signature on this form provides for compliance with certification requirements under 15 CFR Part 28, 'New Restrictions on Lobbying.' The certifications shall be treated as a material representation of fact upon which reliance will be placed when the Department of Commerce determines to award the covered transaction, grant, or cooperative agreement.

LOBBYING

As required by Section 1352, Title 31 of the U.S. Code, and implemented at 15 CFR Part 28, for persons entering into a grant, cooperative agreement or contract over \$100,000 or a loan or loan guarantee over \$150,000 as defined at 15 CFR Part 28, Sections 28.105 and 28.110, the applicant certifies that to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, 'Disclosure Form to Report Lobbying,' in accordance with its instructions.

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure occurring on or before October 23, 1996, and of not less than \$11,000 and not more than \$110,000 for each such failure occurring after October 23, 1996.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

In any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, 'Disclosure Form to Report Lobbying,' in accordance with its instructions.

Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure occurring on or before October 23, 1996, and of not less than \$11,000 and not more than \$110,000 for each such failure occurring after October 23, 1996.

As the duly authorized representative of the applicant, I hereby certify that the applicant will comply with the above applicable certification.

* NAME OF APPLICANT

DoveTel Communications, LLC. dba SyncGlobal Telecom

* AWARD NUMBER

NTIA-MMG-2022

* PROJECT NAME

West and Northwest Georgia Middle Mile Broadband Backbone

* Title: CEO / President

Suffix:

* SIGNATURE:

* DATE:

09/12/2022

Grant Request Number	GRN-000531
Funding Program Name	Middle Mile Broadband Infrastructure Grant Program
Funding Request Name	DoveTel Communications, LLC. dba SyncGlobal Telecom - Middle Mile - GRN-000531
Applying Organization	Dovetel Communications, LLC
Applicant Name	[REDACTED]

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?

Telecommunications Company

— — —

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 - [REDACTED] DoveTel Communications, LLC. dba SyncGlobal Telecom; Vice President of

Outside Plant; [REDACTED]

KeyPersonnel [REDACTED]

[REDACTED]

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 - [REDACTED] Dovetel Communications, LLC; Sr. Project Engineer;

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 - [REDACTED] DoveTel Communications, LLC. dba SyncGlobal Telecom; COO;

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 - [REDACTED] DoveTel Communications, LLC. dba SyncGlobal Telecom; CEO;

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 - [REDACTED] Dovetel Communications, LLC; Sr. Operations Manager;

[REDACTED]

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 - [REDACTED] Dovetel Communications, LLC; CFO: [REDACTED]
[REDACTED]
[REDACTED]

Organizational Charts

Each applicant shall submit any necessary organizational chart(s) detailing all of its parent companies, subsidiaries, and affiliates.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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.

SyncGlobal is a registered CLEC, IXC, ISP, and approved Georgia Broadband Partner serving business-class end users since 2001. SyncGlobal serves IRU clients with middle mile, [REDACTED] commercial end user

locations with broadband services, and over [REDACTED] active telephone numbers with local voice service. SyncGlobal's key management team comprised of CEO, COO, CFO, VP Outside Plant, and VP Sales has managed and maintained its long-haul fiber backbone, extended middle-mile routes, developed last mile FTTP solutions, established carrier interconnections, and broadened its facility-based service offerings. SyncGlobal has experience in undertaking other large projects, including an RUS Reconnect project to bring Fiber to the Home to thousands of homes. SyncGlobal has experience working with third-party engineering design teams and third-party installation contractors. For the MMG route, SyncGlobal will provide oversight and management of both internal resources and third-party contract resources. [REDACTED]

[REDACTED] Individuals responsible for management of this work include the following: CEO, CFO, COO, VP of Sales, VP of Outside Plant, network engineers, project managers, and field supervisors. SyncGlobal executes large deployments using a defined process with clear objectives, measurements, and risk management protocols in place to govern the team and subcontractors. The program objectives and measurements are developed and clearly understood by all participants. Weekly tracking of plan to actual performance, risk identification meetings are held with active parties to ensure any impediments are identified in a timely fashion and risk mitigation and problem solving is performed. Monthly operational, financial, quality and compliance metrics are reviewed for plan to actual along with risk mitigation planning and management. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Outside Plant operates dedicated construction and damage prevention teams. The construction group is fully outfitted and trained to perform underground and overhead builds. Over the last two decades, SyncGlobal has earned a reputation for conscientious and efficient outside plant construction. The damage prevention group consists of dedicated damage prevention specialists who are tasked with locating and protecting all fiber facilities. Sales and Customer Support functions include outside sales, marketing, account management, customer care, end user training, wholesale service procurement, telephone number porting, and directory listings.

Financial functions are overseen by the CFO. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] DoveTel Communications, LLC dba SyncGlobal Telecom the applicant [REDACTED]

[REDACTED] (a)(1) DoveTel Communication LLC is a United States of America Georgia corporation with its corporate office located at 1090A Pacific Avenue, Bremen GA, 30110. The managing member of DoveTel Communication LLC [REDACTED]. The only Member of DoveTel Communications LLC [REDACTED] United States of America Georgia corporation with its corporate office located at 1090A Pacific Avenue Bremen GA, 30110. [REDACTED] of DoveTel Communications LLC. [REDACTED] DoveTel

Communications LLC. [REDACTED] the Managing member of DoveTel Communications LLC. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] of all [REDACTED]
[REDACTED] mailing address
is 1090 C Pacific Avenue, Bremen GA, 30110. [REDACTED] is the Treasurer [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] address is 1090 C Pacific
Avenue, Bremen GA, 30110. (3-4) Not applicable. (5) DoveTel Communication LLC is a United States of
America Georgia corporation with its corporate office located at 1090A Pacific Avenue, Bremen GA,
30110. [REDACTED]
[REDACTED]
30110. [REDACTED] (6) Not applicable (7)
(a) (7) DoveTel Communications LLC the applicant is a facilities-based competitive local exchange
carrier, certified by the Georgia Public Service Commission and regulated by the FCC. DoveTel
Communications, LLC a Georgia company is headquartered at 1090A Pacific Avenue, Bremen GA
30110. The applicant owns and operates a fiber network providing broadband services.

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-511final [REDACTED] Dovetel Communications, LLC-GRN-000531.pdf

SAM.gov Registration

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

SAMS Dovetel Communications-[REDACTED]-Dovetel Communications, LLC-GRN-000531.pdf,
Screenshot [REDACTED] Dovetel Communications, LLC-GRN-
000531.png

Additional Waiver Upload

Please upload, as applicable.

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.

DoveTel Communications LLC., dba SyncGlobal Telecom, is excited to present our application for the Middle Mile Grant Program 2022 (MMG). Our proposed approximately 184.77 mile fiber route will provide West and Northwest Georgia with critical middle mile broadband access that does not exist today. This MMG route passes through eight counties between Atlanta and Bremen and Chattanooga. The route in Fulton County will only serve to connect the middle mile to Tier 1 peering providers.

The seven counties with unserved and underserved locations directly serviceable from this route are Douglas, Carroll, Haralson, Polk, Floyd, Chattooga, and Walker. This route will enable one of the most rural quadrants of Georgia with the access needed to connect last mile broadband to unserved and underserved homes and businesses in the areas accessible from the proposed route. The number of unserved and underserved in the seven counties totals 28,566 based upon the 2022 GA Broadband Map.

SyncGlobal is requesting grant funding of \$ 12,234,350. SyncGlobal will provide [REDACTED] match [REDACTED] [REDACTED] which greatly reduces the route's cost per mile and significantly reduces the implementation and construction time. The project timeline is [REDACTED] or less.

SyncGlobal, headquartered in Bremen, GA, is a registered CLEC, IXC, ISP, and approved Georgia Broadband Partner serving end users since 2001. While funding support is needed to make this middle mile route's implementation possible, SyncGlobal's ability to leverage years of experience and investment in GDOT, County, City and Railroad right of ways, network operations, broadband offerings, local voice switching, and back-office support provides significant advantages, reducing risk associated with implementation and ongoing operations and increasing NTIA's return on investment.

The route will be open to all broadband providers offering non-discriminatory interconnections, carrier neutral interconnections, and internet access. Both dark fiber and lit optical transport services will be offered along its path. Access to the main carrier neutral Tier 1 interconnection facilities in Atlanta, Georgia and Chattanooga, Tennessee provides the lowest cost of internet access available. The route also provides access inside the premise and/or into manholes associated with collocation facilities along its entire path. Over [REDACTED] interconnection and/or splicing points providing access to all anchor institutions within 1000 feet along its path are designed into this route. Broadband capability to all

locations far exceeds the NTIA MMG required download and upload speed requirements (not less than 1 Gigabit per second download and upload.) These interconnection points make it easy for any broadband provider to access the MMG route. Internet peering points along the route are spread across its entire path to ensure there is no single point of failure for broadband access.

The backbone route will be implemented [REDACTED]. The underground laterals, connecting the backbone to colocation facilities, are short and will be constructed along previously disturbed dirt minimizing if not eliminating any environmental impact associated with construction.

The buried route makes the project extremely climate resilient to the current and projected hazards for the West, Northwest Georgia Region including inland flooding, severe weather, wildfires, tornadoes, snow and ice, and tree damage. All co-location facilities have battery and generator back up to protect against potential power outages.

The route can provide Terabits of broadband and is scalable, rendering it a sustainable strategy and future proof as the definition of broadband increases over time.

The route will encourage and promote additional extensions and expansions of middle mile and last mile infrastructure and [REDACTED]. Last mile use is demonstrated by SyncGlobal's letter of commitment and associated information in this application, whereby SyncGlobal will use access provided by the route to enable approximately [REDACTED] unserved and underserved homes with retail broadband access. The State of Georgia and other letters of support provided in this application also demonstrate the need and benefit of this route to Georgians.

SyncGlobal will implement and operate the proposed MMG providing quality jobs, a skilled and well-trained workforce ensuring compliance with all Fair Labor practices. SyncGlobal's outreach and recruitment approaches ensure that diverse and underrepresented groups are fully represented and included. We prioritize the hiring of local workers due to the nature of our business.

SyncGlobal has all rights necessary to operate the network making this a permanent solution and fiscally sustainable middle mile strategy.

The West and Northwest Georgia areas associated with the proposed route and service footprint currently have no known commercially available dark fiber service offerings. The proposed middle mile fiber network will significantly reduce future backhaul transport costs associated with bringing broadband from the main Tier 1 peering hubs and locations to the rural end users.

The MMG route's open fiber network promotes broadband connections by providing both dark fiber and lit services supporting current and future broadband needs.

— — —

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 MMG route passes through eight counties between Atlanta and Bremen and Chattanooga. The route in Fulton County will only serve to connect the middle mile to the Tier 1 peering interconnection. The seven counties with unserved and underserved locations directly serviceable from this route are Douglas, Carroll, Haralson, Polk, Floyd, Chattooga, and Walker. The number of unserved and underserved in the seven counties totals 28,566 based upon the 2022 GA Broadband Map (the FCC 2021 data was reviewed on July 2022, the GA Broadband Map 2022 data was used). Two counties, Haralson, and Carroll, are included in the state of Georgia's recent Capital Projects Fund broadband NOFO, listing the most in need Georgia counties. [REDACTED]

[REDACTED] The MMG route can provide the bandwidth capacity needed to support every customer simultaneously using the bandwidth provided to them.

The route has [REDACTED] anchor institutions with access within 1000 feet as illustrated in our route design. The network can facilitate speeds of not less than 1 Gigabit per second download and upload speeds to any of the anchor locations. [REDACTED]

[REDACTED] The underground design will provide climate resilience.

The West and Northwest Georgia areas associated with the proposed route and service footprint currently have no known commercially available dark fiber service offerings for the purposes of providing broadband to end users. The only known commercial offerings of any type at this time are limited bandwidth [REDACTED] lit ethernet transport services, which are sparsely available in the cities but not in the rural areas that this proposed route will serve.

These rural counties need an open fiber network providing both dark fiber and lit services enabling third party providers, [REDACTED] and community organized broadband efforts with a means to access the major [REDACTED] peering interconnection hubs provided by this application's route. No such commercially available route currently exists. Without a middle mile route supported by this grant application, these communities will have limited access to any data services much less broadband services.

The existing environment prohibits the ability to implement broadband offerings that support today's growing broadband and technology needs. The areas served by this MMG route are simply too rural and too far away from the major internet access hubs to attract third party providers.

While some of the counties (Carroll, Douglas, Floyd, and Walker) exceed 50,000 in population, the density maps clearly illustrate that the population density resides in the few cities and that most of the county footprint are rural. Chattooga, Haralson, and Polk are rural counties having a population less than 50,000 and poverty in excess of 10 in poverty with highs in Chattooga 18.8. (2020 Census data).

Education levels in all seven counties are below the state averages of 87.9 for bachelor's degree and higher. Bachelor's degrees and higher are lowest in Chattooga County at 9.7. Industry data shows the services, retail trade and manufacturing as the predominant businesses per 2021 based on the Georgia EMC Demographics.

The MMG infrastructure will benefit high-poverty counties and end users/households in the rural counties traversed by this route. Benefits stemming from the funded middle mile infrastructure will also accrue to high-poverty counties and a substantial number of end users/households that also meet the criteria of:

Household income of or below 200 percent of the Federal Poverty Guidelines
Supplemental Nutrition Assistance Program (SNAP)
Medicaid/Public Health Insurance/VA Insurance recipients
Federal Public Housing Assistance, Supplemental Security Income (SSI), Veterans and Survivors Pension benefit, Special SNAP for Women, Infants, and Children
National School Lunch Program or School Breakfast Program
Federal Pell Grant
Low-income internet program

All Individuals with Income below 200 percent of the poverty ratios per United States Census data:

Carroll County: 38,372
Chattooga County: 12,339
Douglas County: 41,565
Floyd County: 37,129
Haralson County: 8,861
Polk County: 17,288
Walker County: 25,838

Child Welfare: Foster Care Children by county (State Fiscal Year 2021)

Carroll County: 123
Chattooga County: 47
Douglas County: 202
Floyd County: 209
Haralson County: 45
Polk County: 83
Walker County: 131

Medicaid, SNAP, and Supplemental Social Security Income as of June 2022

Carroll County: 13,910 / 9,093 / 3,460

Chattooga County: 3,779 / 2,841 / 991

Douglas County: 16,320 / 11,041 / 3,005

Floyd County: 12,069 / 8,113 / 3,133

Haralson County: 3,816 / 2,822 / 1,033

Polk County: 6,302 / 4,192 / 1,635

Walker County: 8,248 / 4,997 / 1,985

ACP claims by county Jan – Nov 2022

Carroll County: 3,719

Chattooga County: 1,377

Douglas County: 3,448

Floyd County: 2,817

Haralson County: 813

Polk County: 2,117

Walker County: 1,757

Broadly stated, the ability of these financially struggling end-users to afford access to today's highspeed internet will directly impact their ability to seek employment, work from home, seek medical advice and assistance, manage/monitor a variety of their online accounts, seek online education, procure affordable housing options, pay bills, access available government assistance programs, seek transportation and daycare, and provide virtual connections to families/friends. This access to the internet will foster individual growth, education, and financial stability, all of which helps to improve quality of life and overall productivity in the economy and ultimately lessen the need for various government assistance programs.

More specifically, the MMG infrastructure will make it possible for:

Internet Service Providers (ISPs) to support last mile deployment and deliver affordable broadband connectivity for digital inclusion to high-poverty communities and end users/households who meet the criteria for the above listed assistance programs.

- Currently, there is no open access fiber network that offers dark fiber and lit services on a low-cost basis.
- The cost to build an MMG infrastructure without support of this grant isn't feasible. With this grant, third party ISPs, [REDACTED], and community organized broadband efforts will have means to access the major Tier 1 peering interconnection hubs and serve the traversed high poverty areas.
- The MMG infrastructure would remove the high transport cost of legacy (non-broadband) access in

these areas subsequently making broadband access low cost to the providers serving these counties and thus lowering cost to the end users.

Removing limitation on the broadband that can be delivered to the end users/households served.

- The dark fiber and [REDACTED] lit service MMG infrastructure was designed with fiber and lit service capacity exceeding multiples of terabit delivery. It was designed to provide access supporting third party ISPs with middle mile capacity for all of their potential end users to have access to broadband at the same time.

Enabling third party providers to scale their middle mile access to meet the current demand, thus lowering cost to end users / households.

- Removes limitations on how much broadband can be accessed by third party providers on a competitively neutral basis.
- Third party providers can continue to use additional dark fibers and / or lit services as the need and definition of broadband grows over time. This access is scalable, enabling provider cost to remain low and in proportion to what they need at any given time removing unnecessary access cost resulting in lower cost to end users for broadband.

Enables competitive rates and promotes better service to the end users / households served.

- Enables multiple providers to serve the high poverty counties traversed promoting low cost for broadband to end users / households.
- Without this MMG infrastructure the high poverty end users / households in counties traversed by this route will not have a competitive environment. The MMG will enable competition, promote better services, and provide the necessary infrastructure for competitive rates.
- Promotes competitive access to the federal Affordable Connectivity Program, which provides a discount to eligible households, such as the numerous qualified end users located along this MMG route.

The middle mile route of the proposed middle mile infrastructure is designed to enable connection of unserved anchor institutions.

- The design of the MMG route's physical Colocation facilities along this route places these locations at the most logical location from an optical network geographic broadband perspective.

- *This enables unserved anchor institutions the ability to be served with lit or dark fiber services from these strategic locations along the counties traversed by the MMG route.

- *This also enables private broadband WANS to be created between unserved anchor locations such as between schools, police, fire, and first responder locations.

- *The MMG route and infrastructure also enables unserved anchor institutions the ability to connect

to third party providers at these colocation facilities and at the major Peering points at the ends of this route in Chattanooga Tennessee and Atlanta Georgia.

- 1.Provides access to affectively unlimited broadband and the lowest competitive rates.
- 2.Provides access to small and large Telco Providers for access to telecommunications services from providers around the world.
- 3.Provides access to connect private WANs to locations through other providers around the world.

* The design of the middle mile route has over [REDACTED] additional fiber connection points along its path further supporting unserved anchor locations.

- 1.These tie-ins provide both dark fiber and lit service connection options for unserved anchor institutions.
- 2.The connections can provide broadband and private data transport on both dark fiber and lit services.
- 3.The connections can provide unserved anchor institutions with a virtual presence at any of the physical collocations along the route, enabling the same options listed above associated with the physical collocations.

The MMG network will enable lower end-user broadband prices, including but not limited to existing end-user pricing and related middle mile services:

- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] This savings will be accessible to all third-party providers using the MMG route.

* [REDACTED]
[REDACTED] type providers and pricing available from wholesale internet access providers at the [REDACTED] peering locations at the ends of the proposed MMG route.

[REDACTED]
[REDACTED]
[REDACTED]

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.

SyncGlobal is actively planning and coordinating with state, local government leadership and several critical private sector and non-profit organizations who have a real need for this critical infrastructure [REDACTED] to support the growing demands for unserved and underserved broadband services in the community and region.

[REDACTED]

SyncGlobal has also partnered with [REDACTED] to bring broadband access to approximately 10,000 rural homes funded in part by a USDA RUS ReConnect 2 grant. [REDACTED] and its members will directly benefit from the MMG route.

SyncGlobal regularly interfaces with the Georgia Technology Authority (GTA) to align efforts with the state. A State of Georgia/GTA letter of support for this MMG Grant application is attached in the organization chart section.

Lack of access to broadband in these unserved and underserved rural areas has made it impossible for residents in rural counties along and adjacent to the MMG route to fully participate in school, work, and personal healthcare in this era of online engagement. The county and development authority leaders, local state representatives, [REDACTED] and SyncGlobal have ongoing interactions with the Georgia State Broadband Office to ensure that needs of the region are clearly coordinated and

understood. The MMG route will also enable other critical service providers in the region such as [REDACTED] with much needed access to continue serving the region. SyncGlobal will offer dark fiber and lit fiber services along the route, maintaining low-cost access.

— — —

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

— — —

Is the project connecting non-contiguous trust lands?

No

— — —

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

— — —

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

— — —

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

— — —

Please describe:

The proposed Middle Mile project will increase the redundancy and resiliency of telecommunication networks that support broadband services for both commercial and residential services in the area,

[Redacted text block]

This middle mile project will ensure that these entities have the needed redundancy, extended network life and growth capacity to support on-going operations, new technologies and expanded capacity needs.

— — —

Project

Duration

Number of Years

[Redacted text block]

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.

The proposed project plan is based on an award date on May 1, 2023. Any delay in the award will push the timeline and associated spending. The project is [REDACTED]

This project's timeline and completion is accelerated by [REDACTED] years because of [REDACTED]

Critical Path Overview

[REDACTED]

[REDACTED]

Milestone Project Plan

Immediately upon contract execution and award, the project team will initiate a formal team kick off, finalization of project governance and detailed planning including compliance reporting plans. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Annual Capital Investment Schedule:

[REDACTED]

[REDACTED]

Total Grant Funds \$ 12,234,350

All Information is confidential and/or proprietary to SyncGlobal Telecom.

Project Timeline File

Applicants are asked to upload a template 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.

Milestone Schedule and Capital Investment

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Is an extension being requested?

No

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

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.

SyncGlobal is in compliance with all federal labor and employment laws. [REDACTED]

SyncGlobal Telecom has a demonstrated record of compliance with federal labor and employment laws as evidenced in the most recent broadband deployment. Over the past two years SyncGlobal has used contract labor for portions of its large-scale fiber-to-the-home project under Rural Utility Service (RUS) funding, which follows competitive sealed bid procedures. [REDACTED]

SyncGlobal has [REDACTED]. Employees receive full training on the employee handbook at hire and retraining when there are any CEO approved changes. They all sign the handbook, which details how SyncGlobal compensates, time off policies (including FMLA, 401K, ERISA, USERRA, Worker's Comp, inclement weather), anti-discrimination rules, and anti-harassment rules. This is a "living" document and retrained when there are any applicable changes that are reviewed and approved by the corporate CEO. SyncGlobal also advertises all employment law postings on the employee board and online for traveling employees. SyncGlobal trains all interviewers on non-discrimination hiring practices.

SyncGlobal offers employees a safe working environment as required by OSHA and SyncGlobal's own Safety Committee, supported by corporate leadership. Employees are trained on the company Safety Manual and tested according to the company's safety requirements at hire. Employees (according to their job type) undergo additional training such as Ladder Safety, Defensive Driving, ATSSA Certified Flagging, State Utility Foreman License, Competent Person Excavation, Confined Space Entry, GSWCC, Competent Person Silica, and Railway training. [REDACTED]

SyncGlobal offers quality jobs. SyncGlobal offers job training and mentorship from leadership. SyncGlobal's practice is to develop and promote from within.

This is a progressive industry, and as such, it requires employees that can understand and implement cutting edge technology. Tech service companies, such as SyncGlobal, provide more opportunities for employees to work with next generation telecom technologies. [REDACTED]

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.

[REDACTED] Dovetel Communications, L [REDACTED]

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 6000 characters as an open field narrative.

SyncGlobal has a proven 22-year successful history of building and operating broadband networks.

The MMG route's implementation is [REDACTED]
[REDACTED]. We are using an internally skilled and certified workforce alongside contractors with an existing skilled workforce. [REDACTED]

SyncGlobal retains an internal workforce appropriately skilled and credentialed with the technical and operational ability to design, construct, and manage the proposed MMG route.

SyncGlobal's [REDACTED] will manage the project in coordination with the [REDACTED] who has an

active GA Low Voltage-Telecommunication license [REDACTED]. Our CFO will oversee budgets and implementation timeline.

SyncGlobal is a State of GA Utility Contractor [REDACTED]. The fiber installation and project inspection will be overseen by SyncGlobal's [REDACTED]. They hold a State of GA Utility Manager License [REDACTED]. A [REDACTED] h State of GA Utility Foreman License [REDACTED] will provide oversight with third-party construction crews to ensure work quality and support construction process and timeline. SyncGlobal will provide a project coordinator and locate department. [REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED] transport network implementation. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

SyncGlobal staff will operate the dark fiber and lit services across this MMG route. Our 24/7 network operations and control center will monitor the route for dig tickets, emergency locates, fiber cuts, and more. Customer support will work with other providers wishing to use the route.

SyncGlobal delivers robust training programs for new hires and existing employees. Training is for aerial and burial work. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

— — — 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.

To meet the ongoing maintenance and operational needs of the MMG Program, SyncGlobal's damage prevention department, network operations and control center, and optical transport network will continue to hire new staff.

Since 2001 we have operated our existing network developing a skilled pool of diverse workers from the local area. [REDACTED]

SyncGlobal's outreach and recruitment approaches ensure that diverse and underrepresented groups are fully represented and included. We prioritize the hiring of local workers due to the nature of our business. [REDACTED]

Jobs are posted at technical colleges within our reach. We start educating on positions by speaking at local primary and secondary schools, including a team that deploys to local schools to educate the surrounding community on safe underground digging (811 program - "Call before you dig"). We deploy our equipment and staff to give demonstrations.

SyncGlobal [REDACTED]

[REDACTED] We focus on ensuring an unbiased recruiting process, equal pay, and promotional opportunities that reflect the diversity of the community. [REDACTED]

The company has implemented internal training programs. The programs create an equitable on-ramp for unskilled individuals with a clear focus of developing them into higher level technicians. [REDACTED]

All new hires receive industry standard safety training relevant to their positions [REDACTED]

[REDACTED] Teams conduct

regular team safety meetings, and the outside plant has daily meetings to address potential safety concerns for under/over ground work.

— — —
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.

Our MMG route design was reviewed for current and future anticipated weather and climate related hazards and risks.

Plan to identify geographic areas and time scales for performing initial hazard screenings:

[REDACTED] During our application process we evaluated any risk found in [REDACTED] sections to be built to determine if there were any modifications needed to the design. Our plan included implementing all sections of the route in buried conduit to avoid and/or mitigate any current and future weather and climate risk identified:

Plan to avoid and / or mitigate the weather and climate risk identified:

There were no design changes necessary to [REDACTED] ensured hand-holes and access points were not placed in flood plains.

All material risk that materializes over the life of the asset will involve a plan to mitigate the risk. This ongoing analysis is detailed within our annual Climate and Hazard Network Review Process for this route. [REDACTED]

How our initial climate and hazard review was used in finalizing the design of our MMG route and infrastructure.

A climate and hazard review was performed by our company's internal staff in consultation with a third party licensed Professional Engineering [REDACTED]

In compliance with the NTIA MMG program, the initial climate and hazard review included wildfires, extreme heat and cold, inland and coastal flooding, tornado, hurricane, and extreme wind reviews. The frequency and severity of these events in the areas applicable to our route were also reviewed. We used local and national tools such as the 2019 Georgia Hazard Mitigation Strategy, NOAA Storm Events Database, FEMA National Risk Index Map, NOAA State Climate Summaries in our review. We also used our local data sets and hazard communication discussions with providers in the southeast. We used the tools listed in this MMG routes NOFO Section K. Climate Resilience and as specifically listed in our annual "Climate and Hazard Network Review Process.pdf" process provide to the NTIA.

Our review found no current material climate hazard risk. [REDACTED]

Buried fiber in conduit comprises this entire route. This mitigates all current potential climate hazard risk found. [REDACTED]

The [REDACTED]s totaling all new buried fiber construction associated with the laterals to the [REDACTED] collection facilities are not located in flood plains. To mitigate future climate and hazard concerns these were designed to also be buried in conduit. [REDACTED]

The [REDACTED] collocation facilities associated with this MMG route are not located in flood plain areas. All collocation sites have redundant power sources mitigating risk of loss of power from commercial power storm-related damage. All collocation facilities are secure data centers with fire protection, suppression, and monitoring systems mitigating risk from these hazards.

In support of protecting the network from emergency hazards and in support of rapid restoration, the following have been implemented into our MMG route design and operational support plans. Our OSP department maintains fiber and all materials to overbuild sections of the route should a natural disaster occur or to repair fiber cuts and damage. Our internal Locate department inspects and watches every network dig or crossing associated with this MMG route, thus mitigating the risk of construction related fiber cuts.

The [REDACTED] [REDACTED] collocation locations on each end of the MMG route provide bidirectional feeds of broadband access via dark fiber and lit services. This provides fault tolerance and resiliency in network services during network events.

Electronics specified for this route are from [REDACTED] These are major optical vendors ensuring longevity of vendor support and product life.

[REDACTED] will be used to support documentation of the network.

Plan to periodically repeat the process over the life of the project:

We will perform an annual Climate and Hazard Network Review Process for the route, all access points, and all colocation facilities per our [REDACTED] process. This detailed process was submitted to the NTIA and is summarized below.

[REDACTED]

[REDACTED]

-All material risks found.

-Plans and timeline to mitigate or remove risk found .

* If necessary, the mitigations plans will include rerouting and rebuilding affected section(s).

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

Certification of Technical Capability

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

[REDACTED]

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.

[REDACTED]

[REDACTED]

Interconnection practices: Wholesale carriers that are licensed, certificated, and in good standing with the Georgia Public Service Commission and Federal Communications Commission are allowed to interconnect to the project facilities for dark fiber use and lit transport services along the project's route. Interconnections may be made at any of the interconnection splice points beside or inside anchor institutions, data centers, or central offices along the project's route for providing any lawful broadband or other telecommunications services.

Interconnections will be offered in perpetuity (the useful life of the MMG asset [REDACTED].)
Interconnection will include both the ability to connect to the public internet and physical interconnection for the exchange of traffic both on an open access basis.

Network Management practices: End users are required to accept SyncGlobal's Acceptable Use Policy (AUP) and to comply with all applicable federal and state laws. Similarly, wholesale customers are required to sign SyncGlobal's wholesale AUP and to comply with all applicable federal and state laws. All SyncGlobal AUP's comply with the principles set forth in the Federal Communications Commission's (FCC) Internet Policy Statement FCC 05-151, adopted August 5, 2005, or any subsequent ruling or statement. Service level agreements will contain service level guarantees and standards related to jitter, latency, and service availability. The network management policies will be perpetually displayed in a prominent location on SyncGlobal's web page describing any relevant business practices or technical mechanisms employed to manage illegal or harmful content. Subject to the needs of law enforcement, end users are entitled to access the lawful Internet content of their choice and to run applications and services of their choice.

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.

The last mile service objective for this project's 184.77-mile route between Chattanooga Tennessee, Bremen Georgia, and Atlanta Georgia is to enable end user broadband to all unserved and underserved homes and businesses in the rural areas accessible from the proposed route.

SyncGlobal's end user rural broadband service enabled by this project's middle mile route will: 1) provide broadband service coverage to every location within the [REDACTED]
[REDACTED]
[REDACTED] 2) provide high-quality and reliable residential end user [REDACTED]
[REDACTED]
[REDACTED] 3) support end users' ability to simultaneously receive all the bandwidth they have purchased; 4) support dramatic increases in bandwidth demand over time (evidenced by our network's design details which include multiple internet peering points and a scalable fiber network); 5) deliver end user services at a low-cost rate while supporting the ongoing operational needs of the network.

SyncGlobal will offer dark fiber to any broadband provider in good standing with the Federal Communications Commission and Georgia Public Service Commission in addition to critical utility and transportation companies who use the route to manage and operate their operations in the Southeastern United States [REDACTED] SyncGlobal will offer lit services over coherent optical transport platforms. These lit services will be offered along this path's route in Georgia between Atlanta, Douglasville, Villa Rica, Bremen, Rome, and Summerville as well as Chattanooga Tennessee. MMG wholesale rates will be kept at the low end of market rates for similar areas that have middle mile networks. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

All information is confidential and proprietary

Applicants are encouraged to upload supplemental documentation.

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.

The West and Northwest Georgia areas associated with the proposed route and service footprint currently have no known commercially available dark fiber service offerings. The only known commercial offerings of any type at this time are limited bandwidth [REDACTED] lit ethernet transport services, which are only sparsely available in the cities but not in the rural areas that this proposed route will serve.

SyncGlobal's proposed middle mile route is 184.77 miles of buried fiber. This route will provide access to the main [REDACTED] internet peering points in Chattanooga, Tennessee and Atlanta, Georgia. It is the route that West and Northwest Georgia need for bringing broadband internet access to their residents and businesses.

SyncGlobal will offer dark fiber to any broadband provider in good standing with the Federal Communications Commission and Georgia Public Service Commission at a just and reasonable wholesale rate in addition to [REDACTED] who use the route to manage and operate their operations in the Southeastern United States. Furthermore, this network will offer lit large-scale transport services using coherent optical transport platforms. These lit services will be offered along this path's route in Georgia between Atlanta, Douglasville, Villa Rica, Bremen, Rome, Summerville and Chattanooga Tennessee at the lowest prevailing wholesale rates in the Southeast region.

The route in Atlanta will begin [REDACTED]

[REDACTED] This route also has over [REDACTED] interconnection and/or

splicing points along its path, making it easy for any broadband provider to access by design.

SyncGlobal will use the broadband access this route makes available to deliver broadband to the residential and business end users it serves directly in rural West and Northwest Georgia. This MMG route minimizes and, [REDACTED]. By connecting to these low-cost [REDACTED] broadband access hubs in both Tennessee and Georgia, this route will enable SyncGlobal to offer the lowest possible wholesale rates to its end users. This new middle mile fiber network will significantly reduce backhaul transport costs associated with bringing broadband from the main [REDACTED] and locations to the rural end users. This means cost for future broadband access to end users in rural West and Northwest Georgia will be reduced by lowering the middle mile access cost.

Type of technology to be used in proposal:

Fiber Optic Technology

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

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

[REDACTED]
[REDACTED]
[REDACTED]

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

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.



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.



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.



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 proposed project primarily utilizes [REDACTED]
[REDACTED]
[REDACTED] potential adverse environmental impacts to threatened or endangered species.

Along with the mainline route, laterals into the [REDACTED]
interconnects will be constructed within the previously disturbed rights of ways in the respective communities. By proposing to construct the new routes within the existing Right of way of previously disturbed dirt, potential environmental impacts are minimized [REDACTED]

Potential impacts to the flood plains were evaluated for the proposed routes and interconnect locations. The proposed routes and interconnects are not within the documented flood plain areas. Since the proposed construction does not pass-through documented flood plains, impacts to aquatic species are minimized [REDACTED]

[REDACTED]

All information in this narrative is considered private and confidential.

— — —

Upload Map Images:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

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.

— — —

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 it 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.

— — —

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.

— — —

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.

[REDACTED]

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.

[REDACTED]

— — —

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.**

[REDACTED]

— — —

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.

[REDACTED]

— — —

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 the MMG ZIP folder.

[REDACTED]

— — —

Any other funding provided for this project?

No

— — —

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.

— — —

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

04-10-2023

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Dovetel Communications, LLC

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. UEI:

d. Address:

* Street1:

1090A Pacific Avenue

Street2:

* City:

Bremen

County/Parish:

Georgia

* State:

Georgia

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

30110-2238

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Middle Name:

* Last Name:

Suffix:

Title:

CEO

Organizational Affiliation:

* Telephone Number:

Fax Number:

* Email:

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

R: Small Business

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

US Department of Commerce (DOC)

11. Catalog of Federal Domestic Assistance Number:

11.033

CFDA Title:

Middle Mile Grant Program

* 12. Funding Opportunity Number:

NTIA-MMG-2022

* Title:

Middle Mile Grant Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

The counties locations directly and indirectly se

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

West and Northwest Georgia Middle Mile Broadband Backbone

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant **GA-03*** b. Program/Project **GA-03**

Attach an additional list of Program/Project Congressional Districts if needed.

GA-05, GA-13, GA-14

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: **05-01-2023**

* b. End Date:

18. Estimated Funding (\$):* a. Federal **12,234,350*** b. Applicant **20,012,223.54*** c. State **0*** d. Local **0*** e. Other **0*** f. Program Income **0*** g. TOTAL **32,246,573.54***** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☐ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

CEO

* Telephone Number:

Fax Number:

* Email:

* Signature of Authorized Representative:

* Date Signed:

04-10-2023

MMG Budget Narrative

Applicant Name: DoveTel Communications, LLC dba SyncGlobal Telecom

Applicant Type: Single Entity

[REDACTED]

Total Project Costs: \$32,246,574

Total Federal Grant Request: \$ 12,234,350

Total Matching Funds (Cash): [REDACTED]

Total Matching Funds (In-Kind): [REDACTED]

Total Matching Funds (Cash + In-Kind): [REDACTED]

Total Matching Funds (Cash + In-Kind) as Percentage of Total Project Costs: [REDACTED]

Fiscally Sustainable Strategies

SyncGlobal is adopting fiscally sustainable middle mile strategies for this middle mile route. These strategies are comprised of a) by design keeping ongoing operational cost extremely low, b) providing an easy to access route along its entire path., c) providing middle mile service offerings meeting cost and carrier grade service demands of providers and industry today and tomorrow.

- Ongoing operations cost must be kept low to ensure operating the middle mile route is sustainable over the course of time. This is a key foundation point for supporting a fiscally sustainable carrier neutral and open access middle mile route.
 - In support of this goal the route is 100% buried and designed primarily [REDACTED]
[REDACTED]
 - Being [REDACTED] protects the route from most crossings, digs, and construction related work that would otherwise impose fiber damage risk [REDACTED]
[REDACTED] This greatly reduces operation cost as the daily locate and protection services required are low and the risk associated with damage and repairs is much lower.

- [REDACTED].
- When looking 20 years and beyond into the future considerations were given to route moves requested by governing authorities and private needs resulting from the economic growth and development that the middle mile route would stimulate. [REDACTED]
[REDACTED] his mitigates if not completely removes operational cost associated with future adds moves and changes along the middle mile route over time.
- The [REDACTED] [REDACTED] are primarily buried [REDACTED] avoiding additional [REDACTED] the strategy of keeping any recurring operational cost low.
- Network Maintenance and Monitoring cost by design will be extremely low. In support of our fiscally sustainable middle mile route strategy this function is performed by SyncGlobal's existing Network operations and control department and existing locate and damage prevention department. This keeps any direct additional cost associated with monitoring and maintaining the middle mile route extremely low day one and over the course of time.
- Providing an easy to access route along its entire path is part of our fiscally sustainable strategy. This helps ensure adoption and continual use of the route.
 - By design our route goes by all existing co-location facilities where other last mile broadband providers and industry would reasonably be expected collocate.
 - By design our route goes by the major internet peering facilities where other last mile broadband providers and industry would collocate and peer for the lowest cost of internet access and to access any number of other telecommunications wholesale and retail services.
 - This middle mile route was designed to pass all existing anchor institutions within 1000 feet of route with fiber access to the middle mile route.
 - This middle mile network was designed with [REDACTED] [REDACTED] locations making it possible for future anchor locations, industry, and broadband providers to request access to the middle mile network at these points placed along the entire path.
- Middle mile service offerings meeting the cost points and carrier grade service demands of third-party broadband provider's and industry's needs today and tomorrow is part of our strategy. This fiscally sustainable strategy supports third party entities continuing to

invest into providing broadband services using the middle mile route over the course of time.

- The technology being deployed [REDACTED]
[REDACTED] optical transport technologies.
- The technologies used are [REDACTED] that have long standing histories of supporting and continually upgrading their electronics meeting the future needs of middle mile networks.
- Service cost points will continually be evaluated against like services in metro and non-rural areas. Cost points requested by third party broadband providers and industry needing to use the middle mile network will be adjusted to support continual use of the network, support of the low operational cost of the network, and to promote third party continual investments into the communities that will be served off the middle mile network.

1. Administrative and Legal Expenses - [REDACTED]

SyncGlobal has [REDACTED]
[REDACTED] has been allocated to the services in the following manner:

[REDACTED]
program. Engineering costs [REDACTED] preliminary design cost estimates. Consulting financial analysis and project management [REDACTED]
[REDACTED] financial analysis required for financial analysis and submission of application.

[REDACTED]					

2. Land, structures, rights-of-way, appraisals, etc. [REDACTED]

The

6. Project Inspection fees .

SyncGlobal will be performing the project inspections [REDACTED]
[REDACTED]

7. Site work - [REDACTED]
[REDACTED]

8. Demolition and removal - \$0

Not Applicable

9. Construction - [REDACTED]

[REDACTED] The MMG grant will provide SyncGlobal and future 3rd party broadband providers using this MMG network with a presence at and middle mile access to this facility. [REDACTED]
[REDACTED]

OSP Construction: [REDACTED] – Chattanooga:

[REDACTED] This configuration was also selected because it is also the most climate, weather, and hazard resilient design possible. The estimated cost to install fiber [REDACTED]
[REDACTED]

This [REDACTED] miles of fiber is comprise of the total route miles [REDACTED] plus slack in handholes and fiber splice locations. There is [REDACTED] feet of slack in the handholes and fiber splice locations along the proposes MMG route. This amount of slack is needed to ensure splice closures can be moved from fiber splice locations and handholes into splicing trailers along the route for tying in other providers and for performing route maintenance. [REDACTED]
[REDACTED]

[REDACTED] The [REDACTED] slack ensures [REDACTED]
access requirements and can perform splicing in a safe location. There are [REDACTED]
[REDACTED]
[REDACTED]

OSP Construction: Lateral Routes:

Material (minus fiber cost as the fiber cost is included above)) and labor to construct lateral
routes [REDACTED] via directional drilling in existing ROW and
blowing the fiber into the conduit. The laterals are in total [REDACTED]
[REDACTED]

ISP Optical Transport

Funding for [REDACTED] transport sites along the route [REDACTED]
[REDACTED]. These sites provide add/drop/multiplexing
capabilities and signal amplification.

Materials for [REDACTED]
[REDACTED]
Additional material cost for [REDACTED]
Labor for installation at [REDACTED]

In Kind Match – [REDACTED]

As stated in the MMG NOFO on page 12, Section C and consistent with federal cost principles,
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED]

We are aware of no material risk associated with the proposed match.

Award of this MMG grant is a condition associated with the proposed match.

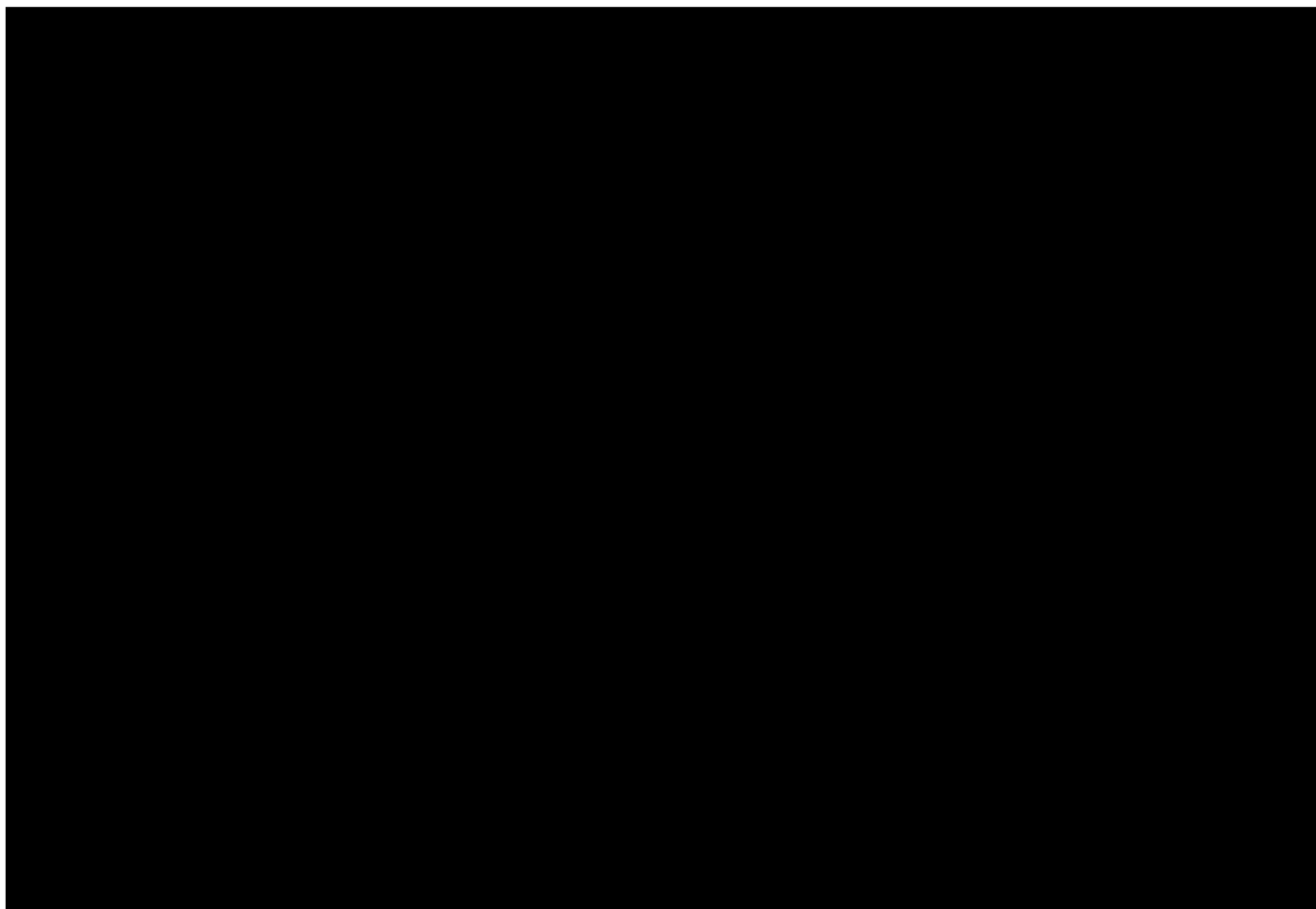
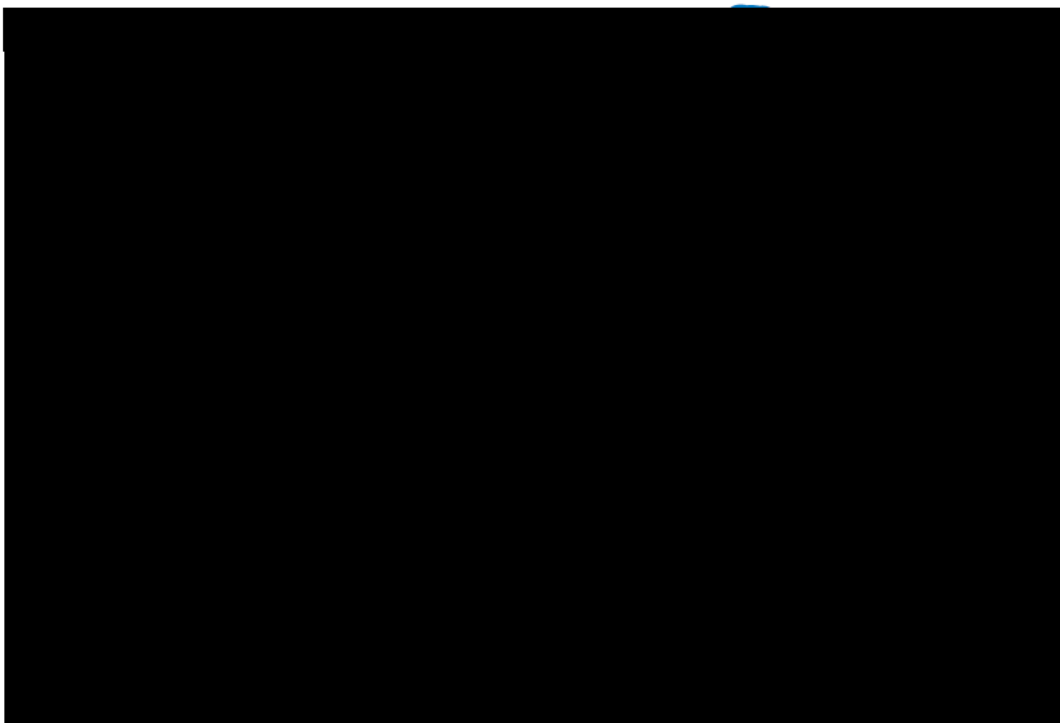
[REDACTED]

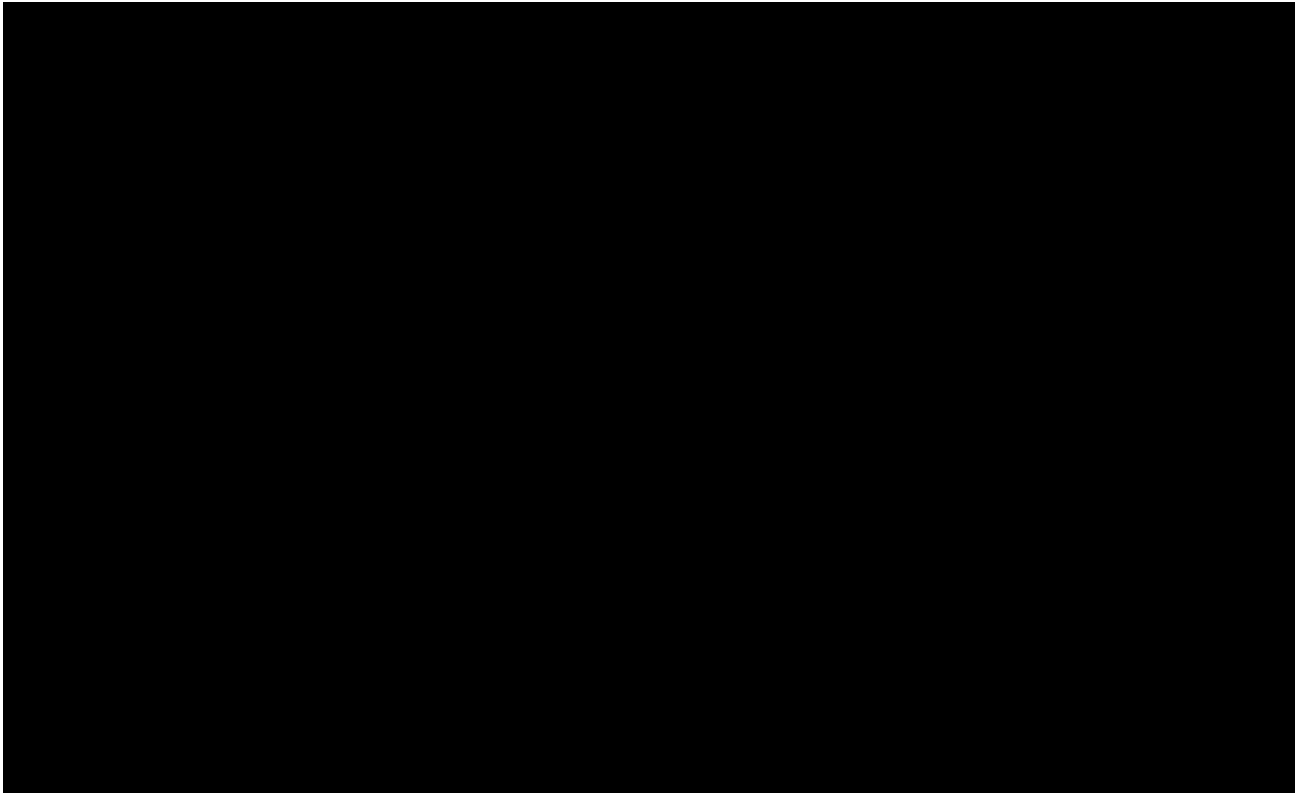
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]





10. Equipment - [redacted]



11. Miscellaneous - [redacted]



12. SUBTOTAL (sum of lines 1-11) - [redacted]

13. Contingencies - \$ [redacted]



14. SUBTOTAL (sum of lines 12-13) - [redacted]

15. Project (program) income - [redacted]



16. TOTAL PROJECT COSTS - [REDACTED]

BUDGET INFORMATION - Construction Programs

NOTE: Certain Federal assistance programs require additional computations to arrive at the Federal share of project costs eligible for participation. If such is the case, you will be notified.

COST CLASSIFICATION

a. Total Cost

b. Costs Not Allowable
for Participationc. Total Allowable Costs
(Columns a-b)

17. Federal assistance requested, calculate as follows:
(Consult Federal agency for Federal percentage share.)
Enter the resulting Federal share.

Enter

\$

INSTRUCTIONS FOR THE SF-424C

Public reporting burden for this collection of information is estimated to average 180 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0041), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

This sheet is to be used for the following types of applications: (1) "New" (means a new [previously unfunded] assistance award); (2) "Continuation" (means funding in a succeeding budget period which stemmed from a prior agreement to fund); and (3) "Revised" (means any changes in the Federal Government's financial obligations or contingent liability from an existing obligation). If there is no change in the award amount, there is no need to complete this form. Certain Federal agencies may require only an explanatory letter to effect minor (no cost) changes. If you have questions, please contact the Federal agency.

Column a. - If this is an application for a "New" project, enter the total estimated cost of each of the items listed on lines 1 through 16 (as applicable) under "COST CLASSIFICATION."

If this application entails a change to an existing award, enter the eligible amounts *approved under the previous award* for the items under "COST CLASSIFICATION."

Column b. - If this is an application for a "New" project, enter that portion of the cost of each item in Column a. which is *not* allowable for Federal assistance. Contact the Federal agency for assistance in determining the allowability of specific costs.

If this application entails a change to an existing award, enter the adjustment [+ or (-)] to the previously approved costs (from column a.) reflected in this application.

Column. - This is the net of lines 1 through 16 in columns "a." and "b."

Line 1 - Enter estimated amounts needed to cover administrative expenses. Do not include costs which are related to the normal functions of government. Allowable legal costs are generally only those associated with the purchases of land which is allowable for Federal participation and certain services in support of construction of the project.

Line 2 - Enter estimated site and right(s)-of-way acquisition costs (this includes purchase, lease, and/or easements).

Line 3 - Enter estimated costs related to relocation advisory assistance, replacement housing, relocation payments to displaced persons and businesses, etc.

Line 4 - Enter estimated basic engineering fees related to construction (this includes start-up services and preparation of project performance work plan).

Line 5 - Enter estimated engineering costs, such as surveys, tests, soil borings, etc.

Line 6 - Enter estimated engineering inspection costs.

Line 7 - Enter estimated costs of site preparation and restoration which are not included in the basic construction contract.

Line 9 - Enter estimated cost of the construction contract.

Line 10 - Enter estimated cost of office, shop, laboratory, safety equipment, etc. to be used at the facility, if such costs are not included in the construction contract.

Line 11 - Enter estimated miscellaneous costs.

Line 12 - Total of items 1 through 11.

Line 13 - Enter estimated contingency costs. (Consult the Federal agency for the percentage of the estimated construction cost to use.)

Line 14 - Enter the total of lines 12 and 13.

Line 15 - Enter estimated program income to be earned during the grant period, e.g., salvaged materials, etc.

Line 16 - Subtract line 15 from line 14.

Line 17 - This block is for the computation of the Federal share. Multiply the total allowable project costs from line 16, column "c." by the Federal percentage share (this may be up to 100 percent; consult Federal agency for Federal percentage share) and enter the product on line 17.

National Telecommunications and Information Administration (NTIA)
Middle Mile Grant Program
Bi-Annual Performance Report



Note: Form instructions and definitions will be created to support the report. Instructional guidance and training will be developed. Numbering to be updated based on final approved form.

RECIPIENT NAME:
Dovetel Communications LLC

OMB Control No.	0660-0052
Expiration Date:	4/30/2026

Middle Mile Grant Program Bi-Annual Performance Report					
A. GENERAL INFORMATION					
GENERAL	1a. Recipient Organization:	Dovetel Communications LLC		1h. Award Identification Number:	13-40-MM531
	1b. Recipient Street Address:	1090 Pacific Ave. STE A		1i. Report Date (MM/DD/YYYY):	11/16/2023
	1c. City, State, and Zip Code:	Bremen, GA, 30110-22-92		1j. Final Report:	Yes I No I-
	1d. Unique Entity Identification (UEI) Number:	[REDACTED]		1k. Report Period Start Date (MM/DD/YYYY):	7/1/2023
	1e. Award Start Date (MM/DD/YYYY):	7/1/2023		1l. Report Period End Date (MM/DD/YYYY):	9/30/2023
	1f. Award End Date (MM/DD/YYYY):	6/30/2026			
	1g. Name of Person Completing Report:	[REDACTED]			
	B. PROJECT NARRATIVE				
PROJECT NARRATIVE	Please use the section below to provide a project narrative of the project(s). This section aims to help reviewers better understand what project is being proposed and steps taken to achieve this goal.				
	2a. A brief description of the recipient's organization and scope of work/project priorities:	Provide West and Northwest GA with a critical Middle Mile broadband access by building a 185 mile fiber route that passes through eight counties between Atlanta, GA to Chattanooga, TN.			
	2b. An overview of the significant outputs and outcomes to be accomplished in the project:	The proposed fiber network will significantly reduce future backhaul transport costs associated with bringing broadband from the main peering hubs and locations to the rural end users and provide over 140 splicing points for access.			
	2c. How would the project meet the recipient's business and/or administrative need(s)?	The last mile service objective for this project's route between Chattanooga Tennessee, Bremen Georgia, and Atlanta Georgia is to enable end user broadband to all unserved and underserved homes and businesses in the rural areas accessible from the proposed route.			
	2d. Provide an overview of key accomplishments achieved for this reporting period on the MM infrastructure project.	NA			
	2e. Provide any roadblock experienced during this reporting period impacting the expansion of the MM infrastructure project (i.e., supply chain, availability of labor).	NA			
	2f. Provide any barriers to improving job quality experienced during this reporting period.	NA			

National Telecommunications and Information Administration (NTIA)
Middle Mile Grant Program
Bi-Annual Performance Report

C. INFRASTRUCTURE MILESTONE CATEGORIES AND PROJECT TIMELINE																																																																																																																																																																																																																	
INFRASTRUCTURE MILESTONE CATEGORIES AND PROJECT TIMELINE	Please use the chart below to provide the start date and end date of your project.																																																																																																																																																																																																																
	OVERALL PROJECT	PROJECT DURATION	3a. PROJECT START DATE	3b. PROJECT END DATE																																																																																																																																																																																																													
		1095	July 1, 2023	June 30, 2026																																																																																																																																																																																																													
	Please provide the duration for each milestone category of your project. The duration should be based on the start and end dates of each category. For example, if you expect to complete a particular milestone within two weeks, fill in the total days (14) in the duration field.																																																																																																																																																																																																																
	Please use the table provided to indicate your EXPECTED percentage of completion on a bi-annual basis for each year of your project. Year 1 begins with your award start date.																																																																																																																																																																																																																
	The percentage of completion should be based primarily on the expenditure of your project budget and should be reported cumulatively from award inception through the end of each semi-annual reporting period. For example, if you expect to complete a particular milestone within the first three periods of your project, the third period and all subsequent periods should state 100%.																																																																																																																																																																																																																
	Please write "0" in the duration field if your project does not include an activity. If necessary, please insert additional milestones at the end.																																																																																																																																																																																																																
	<table border="1"> <thead> <tr> <th colspan="4">ANTICIPATED PROJECT MILESTONES</th> <th colspan="2">Year 1 Baseline</th> <th colspan="2">Year 2 Baseline</th> <th colspan="2">Year 3 Baseline</th> <th colspan="2">Year 4 Baseline</th> <th colspan="2">Year 5 Baseline</th> </tr> <tr> <th>3c. MILESTONE CATEGORIES</th> <th>3d. DURATION (Days)</th> <th>3e. START DATE</th> <th>3f. END DATE</th> <th>Period 1</th> <th>Period 2</th> <th>Period 1</th> <th>Period 2</th> <th>Period 1</th> <th>Period 2</th> <th>Period 1</th> <th>Period 2</th> <th>Period 1</th> <th>Period 2</th> </tr> </thead> <tbody> <tr><td>Overall Project</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Environmental Assessment</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Network Design</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Rights Of Way</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Construction Permits And Other Approvals</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Site Preparation</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Equipment Procurement</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Network Build (all components - owned, leased, infeasible Rights of Use, etc.)</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Equipment Deployment</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Network Testing</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Status of Procurement</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Other (please specify):</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr> </tbody> </table>													ANTICIPATED PROJECT MILESTONES				Year 1 Baseline		Year 2 Baseline		Year 3 Baseline		Year 4 Baseline		Year 5 Baseline		3c. MILESTONE CATEGORIES	3d. DURATION (Days)	3e. START DATE	3f. END DATE	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Overall Project														Environmental Assessment														Network Design														Rights Of Way														Construction Permits And Other Approvals														Site Preparation														Equipment Procurement														Network Build (all components - owned, leased, infeasible Rights of Use, etc.)														Equipment Deployment														Network Testing														Status of Procurement														Other (please specify):													
	ANTICIPATED PROJECT MILESTONES				Year 1 Baseline		Year 2 Baseline		Year 3 Baseline		Year 4 Baseline		Year 5 Baseline																																																																																																																																																																																																				
	3c. MILESTONE CATEGORIES	3d. DURATION (Days)	3e. START DATE	3f. END DATE	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2																																																																																																																																																																																																			
Overall Project																																																																																																																																																																																																																	
Environmental Assessment																																																																																																																																																																																																																	
Network Design																																																																																																																																																																																																																	
Rights Of Way																																																																																																																																																																																																																	
Construction Permits And Other Approvals																																																																																																																																																																																																																	
Site Preparation																																																																																																																																																																																																																	
Equipment Procurement																																																																																																																																																																																																																	
Network Build (all components - owned, leased, infeasible Rights of Use, etc.)																																																																																																																																																																																																																	
Equipment Deployment																																																																																																																																																																																																																	
Network Testing																																																																																																																																																																																																																	
Status of Procurement																																																																																																																																																																																																																	
Other (please specify):																																																																																																																																																																																																																	
Please use the table provided to indicate your ACTUAL percentage of completion on a bi-annual basis for each year of your project. Year 1 begins with your award start date.																																																																																																																																																																																																																	
The percentage of completion should be based primarily on the expenditure of your project budget and should be reported cumulatively from award inception through the end of each semi-annual reporting period. For example, if you expect to complete a particular milestone within the first three periods of your project, the third period and all subsequent periods should state 100%.																																																																																																																																																																																																																	
Please provide a brief description of the primary activities involved in meeting each milestone (a single description should be provided for each milestone, covering all periods in years one through five. Please write "N/A" if your project does not include an activity. If necessary, please insert additional milestones at the bottom of the chart. Please add additional milestones as applicable).																																																																																																																																																																																																																	
% OF PROJECT COMPLETION	ACTUAL PROJECT MILESTONES			Year 1		Year 2		Year 3		Year 4		Year 5																																																																																																																																																																																																					
				Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2																																																																																																																																																																																																				
	4a. MILESTONE	4b. DESCRIPTION		Actual Milestone Completion (Cumulative)																																																																																																																																																																																																													
	Overall Project																																																																																																																																																																																																																
	Environmental Assessment																																																																																																																																																																																																																
	Network Design																																																																																																																																																																																																																
	Rights Of Way																																																																																																																																																																																																																
	Construction Permits And Other Approvals																																																																																																																																																																																																																
	Site Preparation																																																																																																																																																																																																																
	Equipment Procurement																																																																																																																																																																																																																
Network Build (all components - owned, leased, infeasible Rights of Use, etc.)																																																																																																																																																																																																																	
Equipment Deployment																																																																																																																																																																																																																	
Network Testing																																																																																																																																																																																																																	
Status of Procurement																																																																																																																																																																																																																	
Other (please specify):																																																																																																																																																																																																																	

National Telecommunications and Information Administration (NTIA)
Middle Mile Grant Program
Bi-Annual Performance Report

Subrecipients and Subawards	List of Subrecipient(s) that received a subaward or subcontract from the eligible entity and a description of the specific project for which grant funds were provided.									
	Associate projects names to any subrecipient or subaward associated with grant, approved grant funds, and expenditures to date.									
	5a. Project Name	5b. Project Description	5c. Subrecipient	5d. Minority Business Enterprise (MBE)	5e. Women's Business Enterprise (WBE)	5f. Labor Surplus Area Firm	5g. Awarded Funds	5h. Expenditures to Date	5i. Remaining Grant Balance	5j. % of work complete
	NA	NA	NA	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	NA			
				Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>				
				Yes <input type="checkbox"/>	Yes <input type="checkbox"/>	Yes <input type="checkbox"/>				
D. INFRASTRUCTURE BUDGET EXECUTION DETAILS										
INFRASTRUCTURE BUDGET EXECUTION DETAILS	Please provide details below on your total budget and total fund expended to date for each budget element, including detailed disbursements of both matching funds approved and federal funds obligated from project inception through end of this reporting period. Figures should be reported cumulatively from award inception to the end of the applicable reporting period.									
	6a. Projected Budget Element	6b. Federal Funds	6c. Non-Federal Funds	6d. Total Project Budget	6e. Total Federal Funds Expended to Date	6f. Total Non-Federal Funds Expended to Date	6g. Total Funds Expended	6h. Percent of Federal Funding Expended to Date (Cumulative)		
	Administrative and legal expenses									
	Land, structures, rights-of-way, appraisals, etc.									
	Relocation expenses and payments									
	Architectural and engineering fees									
	Other architectural and engineering fees									
	Project inspection fees									
	Site work									
	Demolition and removal									
	Construction									
	Equipment									
	Miscellaneous									
	Subtotal									
Contingencies										
Totals										
E. COMMUNITY BENEFIT AGREEMENT										
COMMUNITY BENEFIT AGREEMENT	As stated in the MM Grant Program NOFO a Community Benefit Agreement (CBA) is an agreement signed by community benefit groups and a developer, identifying the community benefits a developer agrees to deliver, in return for community support of the project.									
	Please use the fields below to state the Community Benefit Group and Developer Name and describe the activities in how this partnership has supported with the Middle Mile Infrastructure project (i.e. wage agreements, targeting hiring of apprentices and disadvantaged groups in labor market, education and training opportunities, sub-contracting to local small business for construction, services, and supply chain needs).									
	<u>Description of Community Agreement</u>									
	7a. Community Benefit Group Name: Please provide the name of the Community Benefit Group									
	NA									
	7b. Developer Name: Please provide the name of the Developer									
	NA									
7c. Community Benefit Group and Developer Partnership: Please describe in the space below the nature of the partnership and how the MM grant funds being used are assisting to provide community support for the Infrastructure project.										
NA										

National Telecommunications and Information Administration (NTIA)
Middle Mile Grant Program
Bi-Annual Performance Report

F. CLIMATE RESILIENCE			
CLIMATE RESILIENCE	<p>Recipients must demonstrate that they have sufficiently accounted for current and future weather and climate related risks to new MM infrastructure projects. At present, weather and climate related risks to broadband networks include wildfires, extreme heat and cold, inland and coastal flooding, and the extreme winds produced by weather events such as tornadoes, hurricanes, and other weather events. Because retrofitted and new infrastructure for broadband might be expected to have a lifetime of 20 years or more, recipients must account not only for current risks but also for how the frequency, severity, and nature of these extreme events may plausibly evolve as our climate continues to change over the coming decades.</p> <p>Climate Resiliency Risk Mitigation</p> <p>This purpose of this section is for the recipient to demonstrate that they have sufficiently accounted for current and future weather and climate-related risks to new MM infrastructure projects. In particular, each recipient should demonstrate how they've addressed the known and identifiable risks of current and future projected weather and climate conditions through measures such as (but not limited to) choice of a technology platform suitable to the climate risk of the region, reliance on alternatives siting of facilities (i.e., underground construction where appropriate), retrofitting, or hardening of existing assets, and use of network redundancy to safeguard against threats to infrastructure.</p> <p>8a. Were any geographic areas identified for this reporting period subject to an initial and/or updated hazard screening for future weather and climate related risk? If so, please provide the date of the screening and provide related documentation as an attachment to this report.</p>		
	no		
	8b. Climate Resilience Category	8c. Date of Most Recent Hazard Screening	8d. Name and Title of Representative Completing Most Recent Hazard Screening
	na	na	na
	<p>8f. Identified Risk: For your MM project, what are the potential weather and climate hazards that may be most important to be addressed that could impact the resiliency of the middle mile infrastructure deployed (i.e. wildfires, extreme heat and cold, inland and coastal flooding, extreme winds: tornadoes, hurricanes and other weather events)?</p> <p>The route area hazard risks include; inland flooding, severe weather, wildfires, tornadoes, snow and ice, and tree damage (2019 Georgia Hazard Mitigation Strategy, NOAA Storm Events Database, FEMA National Risk Index Map, NOAA State Climate Summaries).</p>		
	<p>8g. Weather and Climate Hazards: Were any significant climate or weather hazards experienced during this reporting period (i.e., floods, tornados) impacting infrastructure buildout or service? Briefly describe how you monitored for weather and climate caused issues for the reliability of the system. If so, please provide the date of the disaster, location and backup documentation related (i.e., news articles).</p>		
	no		
	<p>8h. Risks to Deployment of New Infrastructure: Has the team identified any risks impacting the deployment of new or repaired infrastructure due to current and future weather and climate-related threats during this reporting period?</p>		
	No		
	<p>8i. Risk Mitigation: How will the project avoid and/or mitigate the risk identified? If not applicable, please explain why.</p> <p>Our MMG route plan includes the following to avoid and/or mitigate any weather and climate risk identified:</p> <p>All sections of the route will be buried in conduit.</p> <p style="margin-left: 40px;">i. Underground conduit is the most climate resilient design for our geographic area.</p>		
	<p>8j. Additional Information: Is there any additional information you would like to share during this reporting period that the grant team should be aware of regarding the management of sustainable climate resiliency for your MM project?</p>		
	NA		
	<p>8k. Additional Resources</p> <p>Has the team utilized the available resources to assist with mitigation and long-term planning efforts for this reporting period? If so, which resources?</p> <p>2018 National Climate Assessment NOAA's 2022 State Climate Summaries NOAA Disaster and Risk Mapping Tool NOAA's Storms Event Database NOAA Climate Explorer and Digital Coast FEMA National Risk Index Consulted FEMA-approved Hazard Mitigation Plans prepared by states in which they propose to build middle mile infrastructure to help identify key risk and hazards</p>		
	2019 Georgia Hazard Mitigation Strategy, NOAA Storm Events Database, FEMA National Risk Index Map, NOAA State Climate Summaries		

National Telecommunications and Information Administration (NTIA)
Middle Mile Grant Program
Bi-Annual Performance Report

G. Workforce																										
DAVIS-BACON ACT CERTIFICATION	For projects receiving over \$5,000,000 (based on expected total cost), as determined by the U.S. Secretary of Labor by subchapter IV of chapter 31 of title 40, United States Code (commonly known as the "Davis-Bacon Act"), all laborers and mechanics employed by contractors and subcontractors in the performance of such project are paid wages at rates not less than those prevailing.																									
	Davis-Bacon Act Certification																									
	9a. Does the recipient have access to the information requested (all laborers and mechanics employed by contractors and subcontractors in the performance of such project are paid wages at rates not less than those prevailing?)										Yes <input type="checkbox"/>		No <input checked="" type="checkbox"/>		NA at this time											
LOCAL HIRE PRIORITIZATION AND IMPACT	Local Hire Prioritization and Impact																									
	Local hiring is a goal or requirement to hire people who live close to the place of work. This aim is often more specifically structured as a requirement for contractors awarded certain types of publicly funded projects to recruit a certain proportion of the people working on the project from a particular area. Please provide all direct hires and contractors supporting the MM Infrastructure project.																									
	Please use the table below to describe how the project prioritizes local hiring.																									
	Hires by Race, Ethnicity and Gender	Number of Hires																								
		Race/Ethnicity																								
		9b. Hispanic or Latino			9c. Non-Hispanic/Non-Latino												Totals									
					9c-1. Men						9c-2. Women							9c-3. X								
		9b-1. Men	9b-2. Women	9b-3. X	White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More Races	White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More Races		White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More Races			
	Number of Local Direct Hires	0	0																				0			
	Number of Non-Local Direct Hires		0	0																		0				
Percentage of Local Direct Hires on Award		0%	0%	0%	0%	0%	0%	0%	0%	0%	25%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%					
Number of Local Subcontractors			0								0										0					
Number of Non-Local Subcontractors			0																		0					
Percentage of Local Subcontractors on Award		0%	0%	0%	50%	0%	0%	0%	0%	0%	100%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%					
DAVIS-BACON WAGES	Davis-Bacon Act Wages																									
	Please confirm if wages are at least prevailing*																									
	*As stated in the MM NFO as determined by the U.S. Secretary Labor in accordance with subchapter IV of chapter 31 of title 40, United States Code (commonly known as the "Davis-Bacon Act"), for the corresponding classes of laborers and mechanics employed on projects of a character similar to the contract work in the civil subdivision of the State (or the District of Columbia) in which the work is to be performed.																									
	10a. Are wage rates at least the Davis-Bacon prevailing wage for all laborers?										Yes <input type="checkbox"/>		No <input type="checkbox"/>		10c. Are wage rates at least the prevailing wage for all mechanics?						Yes <input type="checkbox"/>		No <input type="checkbox"/>			
	10b. Please cite your source of how this information was gathered (for 10a).										10d. Please cite your source of how this information was gathered (for 10c).															
10e. If you answered "No" to either 10a. or 10c., please provide an attachment reporting the wages and benefits of workers on the project by job classification, and whether those wages are less than the prevailing wage.																										
WORKFORCE DEMOGRAPHICS	Workforce Demographic Data																									
	Jobs by Race, Ethnicity and Gender	Number of Jobs																								
		Race/Ethnicity																								
		11a. Hispanic or Latino			11b. Non-Hispanic/Non-Latino												Totals									
					11b-1. Men						11b-2. Women							11b-3. X								
11a-1. Men		11a-2. Women	11a-3. X	White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More Races	White	Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More Races	White		Black or African American	Native Hawaiian or Pacific Islander	Asian	Native American or Alaska Native	Two or More Races				
Jobs Created	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-	-	0				
Jobs Retained	0	0	0	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0					
UNIONIZED WORKFORCE	12-a. Does this project include some workforce elements that are unionized?										Yes <input type="checkbox"/>		No <input checked="" type="checkbox"/>		12-c. Does your MM project utilize a project labor agreement?						Yes <input type="checkbox"/>		No <input type="checkbox"/>		NA	
	12-b. Are workers provided access to union educators/organizers on employer property or during the work day?										Yes <input type="checkbox"/>		No <input type="checkbox"/>		12-d. Did workers receive additional information or training about their workplace rights in addition to already required notice postings?						Yes <input type="checkbox"/>		No <input type="checkbox"/>		NA	

National Telecommunications and Information Administration (NTIA)
Middle Mile Grant Program
Bi-Annual Performance Report

H. Workforce Continuity Plan
National Labor Relations Act (29 U.S.C. 158 (f))

WORKFORCE CONTINUITY PLAN
NATIONAL LABOR RELATIONS ACT

As stated in the MM NOFO, if a recipient has not provided a certification that a project either will use a unionized project workforce or included a project labor agreement, meaning a pre-hire collective bargaining agreement consistent with section 8(f) of the National Labor Relations Act (29 U.S.C. 158 (f)), then the recipient must provide a project workforce continuity plan.

Workforce Continuity Plan

13a. Please describe the steps taken to ensure the project has ready access to a sufficient supply of appropriately skilled and unskilled labor to ensure construction is completed skillfully throughout the project's life (as required in Section III.B of the MM NOFO). As stated in the MM NOFO, the middle mile grant recipient is capable of carrying out the proposed project in a competent manner, including a plan to attract or retain an appropriate skilled and credentialed workforce.

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

Has the team offered any of the following resources to assist with maintaining a sufficient supply of appropriately skilled labor force for this reporting period? If so, which resources (please provide a brief description of any of the following that apply):

Professional Certifications
In-House Training
Registered Apprenticeships
Labor-Management Partnerships
Partnerships with entities like unions, community colleges, or community-based groups?

SyncGlobal's outreach and recruitment approaches ensure that diverse and underrepresented groups are fully represented and included. We prioritize the hiring of local workers due to the nature of our business. Our business requires [REDACTED]
Jobs are posted at technical colleges within our reach. We start educating on positions by speaking at local primary and secondary schools, including a team that deploys to local schools to educate the surrounding community on safe underground digging (B11 program - "Call before you dig"). We deploy our equipment and staff to give demonstrations.
SyncGlobal utilizes the Indeed online posting site, one of the largest in the US. Indeed takes action to embed diversity, inclusion and belonging throughout the business as integral to their mission to help all people get jobs. We focus on ensuring an unbiased recruiting process, equal pay, and promotional opportunities that reflect the diversity of the community [REDACTED]
The company has implemented internal training programs. The programs create an equitable on-ramp for unskilled individuals with a clear focus of developing them into higher level technicians [REDACTED]

13b. Please describe below, the steps taken to minimize risks of labor disputes and disruptions that would jeopardize the timeliness and cost-effectiveness of completing the MM project.

[REDACTED]

13c. Please describe below the steps to ensure a safe and healthy workplace that avoids delays and costs associated with workplace illnesses, injuries, and fatalities.

All new hires receive industry standard safety training relevant to their position [REDACTED]. This may include areas such as OSHA required safety protocols (ie. Hazardous Communication, PPE, Safety Action Plan, Driver & Fleet Safety, Equipment Safety). Teams conduct regular team safety meetings, and the outside plant has daily meetings to address potential safety concerns for under/overground work.

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

Has the team offered any of the following resources to assist with maintaining a safe and healthy workplace for this reporting period? If so, which resources (please provide a brief description of any of the following that apply):

Safety Training
Certifications and/or Licensure Requirements for all relevant works (e.g., OSHA 10, OSHA 30, confined space, traffic control, or other training required of workers employed by contractors)
Issues raised by workplace safety committees and their resolutions?

NA

13e. Please provide the name(s) below of any subcontracted entities performing work on the project, and the total number of workers employed by each entity.

13e-1. Name of Subcontracted Entity Performing Work	13e-2. Total Number of Workers within this Subcontract	13e-3. Job Categories of Workers Supporting Project within this Subcontract
[REDACTED]	[REDACTED]	Professional Engineer

13f. Please describe below the steps taken to ensure that workers on the project receive wages and benefits sufficient to secure an appropriately skilled workforce in the context of the local and regional labor market.

Contracted hourly billing rate for Professional Engineer is consistent with industry standards for role after reviewing average wages and benefits for this position across multiple sites including Indeed, salary.com

I. ANCHOR INSTITUTIONS

ANCHOR INSTITUTIONS	Please provide Anchor Institution (AI) data for the current period only (not cumulative). Please add rows as needed.						
	14a. Anchor Institution Name	14b. Street Address	14c. City	14d. State	14e. Type of Anchor Institution	14f. Interconnection within 1,000 Feet of AI Enabling Gig Symmetrical Service	14g. Narrative Description of how the Anchor Institution may benefit from the Grant Funded Infrastructure
	NA						

National Telecommunications and Information Administration (NTIA)
Middle Mile Grant Program
Bi-Annual Performance Report

J. BROADBAND ACCESS KEY INDICATOR: SUBSCRIBERS AND SPEED													
PROJECTED NUMBER OF SUBSCRIBERS AND SPEED	Please use the following table to provide anticipated key indicators with the projected totals for each beneficiary category, access type and speed category for your infrastructure service or project. Except as indicated, information should be reported cumulatively from award inception through the end of the semi-annual period for Semi-Annual Indicators. Please write "N/A" if your project does not include this indicator.												
	PROJECTED NUMBER OF SUBSCRIBERS AND SPEED		Year 1		Year 2		Year 3		Year 4		Year 5		
	SUBSCRIBER TYPE	ACCESS TYPE	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	
	15a. Anchor Institutions (AIs)	15a-1. Total number of AIs passed											
		15a-2. Number of AIs within 1,000 feet of the middle mile infrastructure											
		15a-3. Total number of AIs served	NA										
		15a-4. AIs with new access	NA										
		15a-5. AIs with improved access	NA										
		15a-6. Total number of AIs served with speeds of at least 1/1Gbps	NA										
	15b. Broadband Wholesalers or Last Mile Providers	15b-1. Total number of broadband wholesalers or last mile providers served	NA										
		15b-2. Broadband wholesalers or last mile providers with new access	NA										
		15b-3. Broadband wholesalers or last mile providers with improved access	NA										
		15b-4. Total number of broadband wholesalers or last mile providers offering speeds of at least 25/3 Mbps	NA										
		15b-5. Total number of broadband wholesalers or last mile providers offering speeds of at least 100/20 Mbps	NA										
		15b-6. Total number of broadband wholesalers or last mile providers offering speeds of at least 1/1 Gbps	NA										
K. BROADBAND ACCESS KEY INDICATOR: NETWORK BUILD PROGRESS													
NETWORK BUILD PROGRESS	Please use the following table to provide anticipated key indicators and progress of your infrastructure project. Except as indicated, information should be reported cumulatively from award inception through the end of the semi-annual period. Please write "N/A" if your project does not include this indicator.												
	NETWORK BUILD PROGRESS		Year 1		Year 2		Year 3		Year 4		Year 5		
	KEY INDICATOR		Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	
	16a. Total of new fiber miles (aerial or buried)												
	16b. Total of fiber miles leased	NA											
	16c. Total of existing fiber miles upgraded	NA											
	16d. Total of new microwave links	NA											
	16e. Total of new towers	NA											
	16f. Total of new interconnection points												
	16g. Total of signed agreements with broadband wholesalers or last mile providers												
	16h. Total of potential agreements (i.e., agreements currently being negotiated) with broadband wholesalers or last mile providers (This Total should NOT be reported cumulatively)												
	L. QUANTIFIABLE METRICS												
	FIBER OPTIC-BASED	Quantifiable Metrics - Section designed to assist with reporting and audit purpose to quantify how much progress was made and track the location of where the progress was made.											
		17a. Fiber Optic Based		Year 1		Year 2		Year 3		Year 4		Year 5	
				Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2
17a-1. Is the fiber a buried/aerial or undersea application?			0										
17a-2. Number of strands deployed			0										
17a-3. Number of miles of buried fiber deployed			0										
17a-4. Number of miles of aerial fiber deployed			NA										
17a-5. Estimated capacity of fiber (i.e. throughput)			Other										
17a-6. Deployment cost per mile of buried fiber optics			0										
17a-7. Deployment cost per mile of aerial fiber optics			NA										
17a-8. Total Spent on Buried Fiber Deployment this reporting period			0										
17a-9. Total Spent on Aerial Fiber Deployment this reporting period			NA										
17a-10. Total spent on Fiber Deployment this reporting period			0										
17a-11. Please provide any additional information about the Fiber Optic deployment (200 words or less)			NA										
17a-12. Please provide the digital mappings (e.g., CAD, Revit, KMZ, KML) for the microwave nodes created during this reporting period.													

National Telecommunications and Information Administration (NTIA)
Middle Mile Grant Program
Bi-Annual Performance Report

		Year 1		Year 2		Year 3		Year 4		Year 5	
		Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2	Period 1	Period 2
MICROWAVE BASED	17b. Microwave Based										
	17b-1. How many microwave nodes have been deployed?	NA									
	17b-2. How many microwave nodes are operating for reporting period?	NA									
	17b-3. Installation cost per microwaveable node	NA									
	17b-4. Number of new towers built to support microwave structure	NA									
	17b-5. If applicable, what type of tower was constructed (a) Monopole (b) Self-Support, or (c) Guyed during this reporting period?	NA									
	17b-6. Average cost per tower installed	NA									
	17b-7. Total spend on Tower deployment this reporting period	NA									
	17b-8. Total spend on microwave deployment this reporting period	NA									
	17b-9. If you answered "other" to question 5a.6 or if it is a combination of multiple types, please provide a detailed narrative description detailing what type of tower or what combination of towers is used for the project and the their associated costs. (200 words or less).	NA									
17b-10. Please provide the digital mappings (e.g., CAD, Revit, KMZ, KML) for each new aerial fiber and buried fiber equipment installed during this reporting period.											
SATELLITE	17c. Satellite										
	17c-1. What satellite provider is being used?	NA									
	17c-2. What is the estimated capacity of the satellite link (i.e. throughput)?	NA									
	17c-3. What is the associated cost to use this satellite service?	NA									
	17c-4. Please provide any additional information about the Satellite deployment (200 words or less)	NA									
17c-5. Please provide the digital mappings (e.g., CAD, Revit, KMZ, KML) for each new aerial fiber and buried fiber equipment installed during this reporting period.											
CERTIFICATIONS	Certifications										
	18. Please provide certification evidencing compliance with Federal labor and employment laws along with the requirements of Infrastructure Investment and Jobs Act and Middle Mile Grant Program, for the bi-annual period for which this report is being filed.										
	I certify that DoveNet Communications LLC is in compliance with Federal labor and employment laws along with the requirements of the Infrastructure Investment and Jobs Act and Middle Mile Grant Program, for the bi-annual period for which this report is being filed.										
	19. Please provide certification evidencing compliance with the Build America, Buy America Act. The Build America, Buy America Act requires that all of the iron, steel, manufactured products (including but not limited to fiber-optic communications facilities), and construction materials used in the project or other eligible activities are produced in the United States unless a waiver is granted.										
I certify that DoveNet Communications, LLC is in compliance with the Build America, Buy America Act.											
MMG GRANT PROGRAM BI-ANNUAL REPORT CERTIFICATION	20. I certify to the best of knowledge and belief that this report is correct and complete for performance of activities for the purposes set forth in the award documents.										
	20a. Typed or Printed Name and Title of Authorized Certifying Official:						20c. Telephone (area code, number and extension):		[REDACTED]		
	[REDACTED], CEO						20d. Email Address:		[REDACTED]		
	20b. Signature of Certifying Official:						20e. Date:		11/16/2023		

Federal Financial Report

(Follow form Instructions)

1. Federal Agency and Organizational Element to Which Report is Submitted <div style="border: 2px solid red; padding: 5px; font-size: 1.2em; font-weight: bold; margin-top: 10px;">Depart of Commerce-NIST/NTIA</div>		2. Federal Grant or Other Identifying Number Assigned by Federal Agency (To report multiple grants, use FFR Attachment) <div style="border: 2px solid red; padding: 5px; font-size: 1.2em; font-weight: bold; margin-top: 10px;">13-40-MM531</div>			
3. Recipient Organization (Name and complete address including Zip code)					
Recipient Organization Name: <div style="border: 2px solid red; padding: 2px;">Dovetel Communications LLC</div>					
Street1: <div style="border: 2px solid red; padding: 2px;">1090 Pacific Ave STE A</div>					
Street2: <div style="border: 2px solid red; padding: 2px;"></div>					
City: <div style="border: 2px solid red; padding: 2px;">Bremen</div> County: <div style="border: 2px solid red; padding: 2px;">Haralson</div>					
State: <div style="border: 2px solid red; padding: 2px;">Georgia</div> Province: <div style="border: 2px solid red; padding: 2px;"></div>					
Country: <div style="border: 2px solid red; padding: 2px;">United States</div> ZIP / Postal Code: <div style="border: 2px solid red; padding: 2px;">30110-2292</div>					
4a. UEI <div style="border: 2px solid red; padding: 2px; background-color: black;"></div>		4b. EIN <div style="border: 2px solid red; padding: 2px; background-color: black;"></div>		5. Recipient Account Number or Identifying Number (To report multiple grants, use FFR Attachment) <div style="border: 2px solid red; padding: 2px;"></div>	
6. Report Type <input type="checkbox"/> Quarterly <input checked="" type="checkbox"/> Semi-Annual <input type="checkbox"/> Annual <input type="checkbox"/> Final		7. Basis of Accounting <input type="checkbox"/> Cash <input checked="" type="checkbox"/> Accrual		8. Project/Grant Period From: <div style="border: 2px solid red; padding: 2px;">7/1/23</div> To: <div style="border: 2px solid red; padding: 2px;">6/30/26</div>	
				9. Reporting Period End Date <div style="border: 2px solid red; padding: 2px;">9/30/2023</div>	
10. Transactions				Cumulative	
<i>(Use lines a-c for single or multiple grant reporting)</i>					
Federal Cash (To report multiple grants, also use FFR attachment):					
a. Cash Receipts				0.00	
b. Cash Disbursements				0.00	
c. Cash on Hand (line a minus b)				0.00	
<i>(Use lines d-o for single grant reporting)</i>					
Federal Expenditures and Unobligated Balance:					
d. Total Federal funds authorized				12,234,350.00	
e. Federal share of expenditures				<div style="border: 2px solid red; padding: 2px; background-color: black;"></div>	
f. Federal share of unliquidated obligations				0.00	
g. Total Federal share (sum of lines e and f)				<div style="border: 2px solid red; padding: 2px; background-color: black;"></div>	
h. Unobligated balance of Federal Funds (line d minus g)				12,121,428.20	
Recipient Share:					
i. Total recipient share required				<div style="border: 2px solid red; padding: 2px; background-color: black;"></div>	
j. Recipient share of expenditures				<div style="border: 2px solid red; padding: 2px; background-color: black;"></div>	
k. Remaining recipient share to be provided (line i minus j)				<div style="border: 2px solid red; padding: 2px; background-color: black;"></div>	
Program Income:					
l. Total Federal program income earned				0.00	
m. Program Income expended in accordance with the deduction alternative				0.00	
n. Program Income expended in accordance with the addition alternative				0.00	
o. Unexpended program income (line l minus line m or line n)				0.00	

11. Indirect Expense						
a. Type	b. Rate	c. Period From	Period To	d. Base	e. Amount Charged	f. Federal Share
g. Totals:				0.00	0.00	0.00

12. Remarks: Attach any explanations deemed necessary or information required by Federal sponsoring agency in compliance with governing legislation:

13. Certification: By signing this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the Federal award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812).

a. Name and Title of Authorized Certifying Official

Prefix: First Name: Middle Name:

Last Name: Suffix:

Title: CEO

b. Signature of Authorized Certifying Official

c. Telephone (Area code, number and extension)

d. Email Address

e. Date Report Submitted

10/18/23

14. Agency use only:

August 23, 2022

National Telecommunications
and Information Administration

**Re: NTIA-MMG-2022
Southern Company Letter of Interest for DoveTel Communication's 2022
National Telecommunications and Information Administration ("NTIA")
Middle Mile Broadband Grant Program Application**

Dear NTIA:

Southern Telecom is aware that DoveTel Communications, LLC d/b/a SyncGlobal Telecom "SyncGlobal" is in the process of applying for funding under the NTIA's 2022 Middle Mile Grant Program. It is our understanding that SyncGlobal's application is intended to help fund implementing a buried, middle mile, fiber route. Once implemented, this route would likely provide broadband access from Atlanta Georgia's and Chattanooga Tennessee's Tier 1, internet access, peering points to rural end users as well as broadband providers along the route.

Should NTIA grant SyncGlobal the NTIA award, this route could have a significant, beneficial impact to the infrastructure for fiber connectivity by enhancing broadband access throughout rural communities in Georgia and Tennessee.

Sincerely,

A solid black rectangular box used to redact the signature of the sender.



GEORGIA
TECHNOLOGY
AUTHORITY



BRIAN P. KEMP

Governor

Shawnzia A. Thomas

*Executive Director
and State Chief
Information Officer*

47 Trinity Avenue SW
Atlanta, GA 30334

(404) 463-2300

gta.georgia.gov

September 23, 2022

National Telecommunications and Information Administration
Herbert C. Hoover Building
U.S. Department of Commerce
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Re: NTIA-MMG-2022 State of Georgia Coordination and Support Letter for DoveTel Communication's 2022 National Telecommunications and Information Administration (NTIA) Middle Mile Broadband Grant Program Application

To Whom It May Concern:

The Georgia Technology Authority (GTA), which is coordinating the state's broadband expansion efforts, would like to offer its support for the NTIA 2022 Middle Mile Grant Program application of DoveTel Communications, LLC dba SyncGlobal Telecom (SyncGlobal). SyncGlobal's application proposes to help fund the implementation of a 200-mile middle mile fiber route. This route will help improve broadband access from the Tier 1 internet access peering points in Atlanta, GA and Chattanooga, TN to rural end users and broadband providers along this route. This route will be open to all broadband providers on a non-discriminatory basis offering both dark fiber and lit broadband services. The proposed route passes through eight counties and has over 140 interconnection points. This middle mile network will benefit current broadband providers and can support future Infrastructure Investment and Jobs Act (IIJA) Broadband Access, Equity, and Deployment (BEAD) awardees in providing improved broadband services to West and Northwest Georgia.

The state supports any Middle Mile Grant Program applications that work to bring additional opportunities for connectivity to the state of Georgia and appreciates NTIA's consideration of this application.

Sincerely,

Jessica Simmons
Deputy CIO for Broadband and Special Projects
Georgia Technology Authority
47 Trinity Avenue, S.W.
Atlanta, GA 30334



650 West Peachtree Street, NW
Atlanta, Georgia 30308
Box 48
404-323-1709



September 9th, 2022

National Telecommunications and
Information Administration

**Re: NTIA-MMG-2022
T Cubed Letter of Support for DoveTel Communication's 2022 National
Telecommunications and Information Administration (NTIA) Middle Mile
Broadband Grant Program Application**

NTIA:

T-Cubed, Thoroughbred Technology and Telecommunications, a subsidiary of Norfolk Southern Corporation, is aware that DoveTel Communications, LLC dba SyncGlobal Telecom (SyncGlobal) is in the process of applying for funding under the NTIA's 2022 Middle Mile Grant Program. SyncGlobal's application helps fund implementing a buried middle mile fiber route [REDACTED]

[REDACTED] This route will provide broadband access from Atlanta Georgia's and Chattanooga Tennessee's [REDACTED] internet access peering points to rural end users and broadband providers along this route.

[REDACTED]

Sincerely,

