Clarke County, Virginia

Comcast Clarke County White Post Broadband Project

Application ID:	59812112018113255
Application Status:	In Progress - DHCD
Program Name:	Virginia Telecommunications Initiative 2019
Organization Name:	Clarke County, Virginia
Organization Address:	101 Chalmers Court Berryville, VA 22611-1387
Profile Manager Name:	Brandon Stidham
Profile Manager Phone:	(540) 955-5130
Profile Manager Email:	bstidham@clarkecounty.gov
Project Name:	Comcast Clarke County White Post Broadband Project
Project Name: Project Contact Name:	Comcast Clarke County White Post Broadband Project David Ash
-	David Ash
Project Contact Name:	David Ash
Project Contact Name: Project Contact Phone:	David Ash (540) 955-5100

Total Requested Amount: \$209,513.00 Required Annual Audit Status: No Current Audits Found

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Dudget Information.

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Cost/Activity Category	DHCD Request	Other Funding	Total
Telecommunications	\$209,513.00	\$119,463.00	\$328,976.00
Construction	\$209,513.00	\$119,463.00	\$328,976.00
Total:	\$209,513.00	\$119,463.00	\$328,976.00

Budget Narrative:

Questions and Responses:

1. Project Area

Provide a map and description of the proposed geographic area including specific boundaries of the project area e.g.; street names, local and regional boundaries, etc. Explain why and how the project area(s) was selected. Attach a copy of your map(s).

Answer:

The geographic area for this proposed project is in the White Post area of Clarke County ("County"). It includes portions of Lord Fairfax Highway east of State Route 522 and south of Route 50, plus Vista Lane, Stone Quarter Road, Fox Lane, portions of Berrys Ferry Road, portions of Carter's Line Road, and portions of White Post Road. A map and spreadsheet of street addresses are attached to this application. The project area was selected after consultation between Clarke County, the White Post Home Owners Association, and Comcast, and it meets the eligibility criteria established by the Virginia General Assembly and the Department of Housing and Community Development ("DHCD") for a Virginia Telecommunication Initiative ("VATI") award.

The project area is bordered on one side by railroad tracks. Crossing railroad tracks requires applying for special permits from the railroad company, in this case Norfolk Southern, which can alter a project's construction timeline and is outside Comcast's control. To ensure that Comcast can meet the construction obligations associated with a VATI grant, locations on the opposite side of the railroad tracks are not included in the proposed project.

2.

Describe your outreach efforts to identify existing providers in the selected project area. Provide a map and list of all existing providers (fixed and wireless), and speeds offered within the project area. Provide a detailed explanation of how this information was compiled and the source(s).

Answer:

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Verizon provides DSL service to some parts of Clarke County, but does not provide service over 10 Mbps down / 1 Mbps up within the selected project area. White Post residents have previously requested that Verizon provide DSL service in the project area without success.

The Virginia Cable Telecommunications Association, of which Comcast is a member, received verification from the fixed wireless broadband service provider Virginia Everywhere, LLC, dba All Points Broadband, that it does not serve the project area. Additional information can be made available to DHCD upon request.

Clarke County submitted a public notice on its website and in the Winchester Star newspaper on November 29 and December 6, 2018 to which no providers responded. It read:

"Clarke County is soliciting public comment for a potential Broadband Project as part of an application(s) for Virginia Telecommunication Initiative Grant Funds. The potential project includes Lord Fairfax Highway east of State Route 522 and south of Route 50, plus Vista Lane, Stone Quarter Road, Fox Lane, portions of Berrys Ferry Road, portions of Carter's Line Road, and portions of White Post Road. For additional information, contact Brandon Stidham at (540) 955-5130. Written comments may be addressed to the County's Planning Office, 101 Chalmers Court, Suite B, Berryville, VA 22611, via email to bstidham@clarkecounty.gov, or in person during normal business hours, no later than December 14, 2018."

3. Project Need/Description

To be eligible for VATI, applicants must demonstrate that the proposed project area(s) is unserved. An unserved area is defined as an area with speeds of

10 Mbps/1 Mbps or less, and with less than 10% service overlap within the project area. Describe the anticipated service overlap with current providers within the project area.

Answer:

The proposed project area is unserved based on data available through the Federal Communications Commission's publicly available Form 477 data and direct information from broadband providers. Comcast and Clarke County anticipate zero service overlap with current providers within the project area according to VATI guidelines.

The attached map of FCC Form 477 data shows several providers offering Internet service in the census blocks encompassing the project area.

Verizon DSL is shown to provide service to the following census blocks, however it is under the speed threshold noted in the VATI guidelines:

Census Block Reported Speed (MBPS DOWN) Reported Speed (MBPS UP)

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• 510430102003036	5	0.768
• 510430102003070	5	0.768

The data also show Comcast may serve the project area in census blocks 510430102003036 and 510430102003070. This is related to a minor geocoding issue in the data, as there is currently no Comcast infrastructure in White Post. Comcast does not provide service to the White Post area.

Finally, FCC data show that fixed wireless company Virginia Wireless LLC, dba All Points Broadband, provides 15 Mbps / 4 Mbps service to the census blocks in White Post, however the company confirmed that it does not provide service to the area. In addition, the White Post HOA president found no resident accessing the Internet through a wired or fixed wireless provider.

As further support, see the Clarke County submitted a public notice excerpt quoted in response to question 2.

Residents' survey data are included as an attachment to this application.

Based on the best information currently available, Comcast and Clarke County understand that the area is unserved.

4. Describe population both in terms of absolute numbers within the project area and the eligible users that will be served by

the proposed project. Describe the basis for these projections.

Answer:

Clarke County does not have independent population estimates, however 2010 U.S. Census Bureau data show the population of the census block encompassing White Post was approximately 750.

There are a total of 97 residential and commercial locations within the proposed service area in Clarke County. The number of locations was determined after a physical "walk out" of the area around the village of White Post by Comcast's Design team.

Comcast proposes to expand its network so that each of these 97 locations is serviceable. Comcast further proposes to apply the same construction standards to the locations included in this project so that any location within 250 feet of the road center can be connected to Comcast's network without a customer contribution. There are 96 locations that are within the 250 foot distance from the road center, and there is one location further than 250 feet. While the location further than 250 feet would be serviceable, customers may be required to make a contribution to aid construction to the location.

In addition, upon completion of this project, Comcast customers who subscribe to an Xfinity Internet package will have access to Xfinity WiFi hotspots, including those that would be newly added to the White Post area, for no additional cost. Moreover, these White Post area customers would be able to access any of Comcast's hotspots throughout Virginia and across the country. Comcast has the country's largest WiFi network, including more than 19 million hotspots nationwide and over 600,000 in Virginia. Even non-subscribers of Xfinity Internet can gain WiFi hotspot access using a WiFi On Demand pass.

According to the Clarke County Public Schools ("CCPS") FY18 Student Broadband Survey, there are 33 public 12/17/2018 9:31:38 AM Pages: 4 of 17

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school students in 22 households within the White Post ZIP code without access to broadband. These students comprise 10.7% of the total number of CCPS students without access to broadband, and can be broken out by grade level as follows:

Grade Level	Number of Students
K – 5	16
6 - 8	7
9 - 12	10

Clarke County Public Schools has joined the multitude of school divisions throughout VA and nationwide in integrating technology throughout its curriculum. Each of its middle and high school students were issued a Chromebook for the first time during the 2018-2019 school year. This initiative has required CCPS students to complete more work online than through traditional paper-pencil methods. Although teachers have worked with individual students to modify assignments, broadband access for many CCPS students is no longer optional, but has become necessary.

In addition to the CCPS Chromebook initiative, each school within the division is focused on digital citizenship. CCPS is currently using the curriculum available through Common Sense Education to teach aspects of appropriate digital citizenship. It is the school system's hope that its students will learn to be great users and consumers of digital media and online resources.

Through construction of Comcast's network to the White Post area, more CCPS students could have Internet access, plus qualifying low-income students' families will also have access to Comcast's Internet Essentials program. Internet Essentials is the nation's largest and most comprehensive broadband adoption program and Comcast's number one community impact initiative. It provides low-cost Internet service, the option to purchase an Internet-ready computer, and access to free digital literacy training online. Internet Essentials is available to households with school-age children eligible for free and reduced price lunches, households living in HUD-assisted housing (including Public Housing, Housing Choice Vouchers, or Multifamily), and eligible low-income veterans. Since 2011, Internet Essentials has connected more than six million low-income Americans (in 1.5 million households) to the Internet at home.

5. Indicate the numbers of businesses and community anchor institutions the proposed project will pass in the project area.

Answer:

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According to Clarke County's Planning Department, there are at least 12 businesses in the project area. These include the local United States Post Office, a classic car restoration shop, and several home-based businesses. Comcast offers small and medium-sized businesses Internet services that accommodate significant bandwidth and networking needs, as well as a variety of voice services and plans that include multiple lines and calling features. Additionally, Comcast Business can provide multi-gig speeds to business customers in Comcast's footprint – whether an enterprise with locations across the country that needs multi-gigabit speed or a small business with only a handful of locations.

The White Post Home Owners Association operates two parks within the village. The first is at the intersection of Route 340 and White Post Road. The second is located just east of 257 White Post Road on Berrys Ferry Road. There are also two churches in the area: Ebenezer Primitive Baptist Church at 14374 Lord Fairfax Highway and Meade Memorial Episcopal Church at 192 White Post Road. The building at 14401 Lord Fairfax Hwy was a church and pre-school; it is now for sale.

6. Provide the anticipated take rate for the proposed service within one year of project completion and describe the basis for the estimate. Also provide all actions to be implemented to reach the identified potential customers within the project area.

Answer:

Comcast's business model is not dependent upon a particular take rate. Forecasting a take rate with a high degree of accuracy is most challenging. Nonetheless, Comcast has undertaken a survey of residents which, combined with its own industry experience, forecasts a take rate on the high end between 45% and 55% within the first year after project completion.

Comcast's take rate estimate for White Post is based upon several unique factors. Clarke County's support for the project and involvement with the community is expected to add heightened awareness earlier than might otherwise occur. The public nature of the VATI program is also expected to add to the early awareness of residents of broadband availability and positively enhance the take rate. Additionally, Comcast conducted a door-hanger campaign in the White Post community to survey the interest of residents in subscribing to Comcast's service offerings. These types of surveys are not accurate enough alone to determine the first year take rate, but in this case revealed a larger demand for service than anticipated. All of the factors combined inform our estimate that, on the high end, some 45% to 55% of residents may take service within the first year after project completion.

These projections for overall subscriber levels are dependent on several factors and even an initial prediction may change as the project progresses. Comparisons between applicants may not provide a useful measure of broadband access as each applicant will have different service offerings, marketing campaigns, and other intangibles that could drive take rates. For example, Comcast take rates may vary from those of other providers because Comcast offers more services than broadband alone – including video, telephone, mobile telephone, and home security – and the company offers bundled pricing promotions from time to time. These additional products and pricing options can change the value proposition of Comcast service for each household that is unique among providers.

Comcast does undertake various actions to make residents aware that service is available. During the construction phase, before the service is active, the presence of Comcast vehicles visually alerts residents that service is coming.

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Comcast personnel involved with the construction in the public rights of way are often asked about availability. Soon after completing construction, Comcast provides notice to potential customers of service availability on a rolling basis. It typically employs various communication tactics to inform residents of availability. These tactics can include direct mail pieces, door hangers, and visits by Comcast sales representatives to residents' homes. These efforts augment existing advertising campaigns already in place within Clarke County for Comcast's existing customer base. Once service is established, Comcast may communicate with these residents through direct mail, direct e-mail, radio ads, video ads, and other marketing tactics.

7. A statement whether the proposed project is targeting the "last mile," "middle mile," or "backbone" portion of the broadband infrastructure.

Answer:

The project in this application will involve constructing "last mile" broadband infrastructure, and will provide connectivity to the households and businesses within the service area represented in the attached map. Comcast will own, operate, and maintain the network it constructs pursuant to this application.

Comcast has built a fiber backbone at the core of its network that stretches across the country with more than 600,000 route miles of fiber-optic and coaxial plant nationwide – using the industry's most advanced optics/lasers and Internet Protocol ("IP") routing technologies. Dozens of converged regional area networks interconnect to create this fiber backbone that delivers video, voice, and high-speed Internet services to tens of millions of customers throughout the country. IP technology ties all of this together, creating a highly scalable connectivity platform or "IP core." Comcast has been building fiber into its networks incrementally over the past decade. In 2015, Comcast introduced Gigabit Pro, the industry's first residential fiber-to-the-home 2 Gigabit-per-second ("Gbps") service ever offered by an Internet service provider in the United States. In 2018, Comcast announced that it is the nation's largest provider of gigabit broadband, providing access to nearly 58 million homes and businesses.

Comcast's hybrid fiber coaxial ("HFC") network model offers the most flexibility and the best economics now and into the future. The company can surgically add speed, capacity, and fiber to its networks in a smart and economically feasible way.

Comcast's existing HFC network will deliver speeds up to 1 Gbps to residential customers. These speeds are among the fastest and most widely available and include access to the nation's largest WiFi network of more than 19 million hotspots. Combined with the company's recently launched Xfinity xFi platform, a new and personalized home WiFi experience, Comcast would provide its White Post customers with the fastest speeds, the best WiFi coverage, and ultimate WiFi control in their homes.

8. For wireless projects only: Please explain the ownership of the proposed wireless infrastructure. Will the wireless co-applicant own or lease the radio mast, tower, or other raised structure onto which the wireless infrastructure will be installed?

Answer:

N/A

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9. Provide a description of the broadband service to be provided, including estimated download and upload speeds, whether that speed is based on dedicated or shared bandwidth, and the technology that will be used. This description can be illustrated by a map or schematic diagram, as appropriate.

Answer:

In 2018, Comcast increased the download speeds of several of its residential "Performance," "Performance Pro," and "Blast!" broadband options. The broadband infrastructure Comcast would put in place in White Post would offer all customers six residential and business broadband options that exceed the minimum requirements for VATI, as noted in the tables below:

Residential Tier	Speeds up to
Performance	60 Mbps down / 5 Mbps up
Performance Pro	150 / 5
Blast!	250 / 10
Extreme Pro	400 / 10
Gig	1000 (1 Gbps) / 35
Gigabit Pro	2000 (2 Gbps) / 2000 (2 Gbps)

Business Tier	Speeds up to
Starter	25 Mbps down / 5 Mbps up
Business Internet 75	75 / 15
Business Internet 150	150 / 20
Business Internet 300	300 / 25
Business Internet 500	500 / 35
Business Internet 1G	1000 (1 Gbps) / 35

Comcast will utilize DOCSIS technology in building the network. DOCSIS technology is an international telecommunications standard that permits the addition of high-bandwidth data transfer to an existing cable TV system. It is employed by many cable television operators, including Comcast, to provide Internet access over an existing HFC infrastructure. The industry continues to deliver great speeds over DOCSIS 3.0, and is moving 12/17/2018 9:31:38 AM Pages: 8 of 17

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purposefully toward increased adoption of DOCSIS 3.1, which Comcast began deploying in Clarke County in 2017. DOCSIS 3.1 enables Comcast to bring broadband speeds of up to almost 1 Gbps to a service area.

10. Provide a description of the network system design used to deliver broadband service from the network's primary Internet point(s) of presence to end users, including the network components that already exist and the ones that would be added by the proposed project. Also describe specific advantages of using this technology. Provide a detailed explanation on how this information was compiled and source(s). For wireless projects, provide a propagation map including the proposed project.

Answer:

Comcast proposes to complete the construction of the area with a hybrid fiber coaxial solution, emanating from the closest facility to the project. Fiber optic cables would be constructed to the service area, commonly referred to as a serving node, where optical signals would be converted to electrical or radio frequency for distribution on the coaxial network.

Upon completion of the White Post Project build, Comcast will be able to offer its full suite of products and services to residents in the proposed service area, including broadband services, voice, video, and home security. With respect to broadband service, Comcast's 1 Gigabit Internet service will use DOCSIS 3.1 technology to deliver the speeds through its HFC network. To enjoy the service, all customers need to do is install a DOCSIS 3.1 cable modem, which can be rented from Comcast or purchased on their own.

According to the FCC's "2016 Measuring Broadband America: Fixed Broadband Report," (Federal Communications Commission 2016)[1] Comcast's actual upload and download speeds were over 100% of what was advertised. Residents and businesses in the proposed service area will be offered broadband services of the same quality and current price as those offered in other Comcast service areas. Comcast will not offer a separate rate applicable to only those customers within the project area included in this proposal. The customer will ultimately decide which service tier best suits their needs and preferences.

Residential Xfinity Internet and Video customers will also have access to Xfinity X1. X1 is a video platform that delivers the simplest, fastest, and most complete way for customers to access all of their entertainment on all of their screens. Features include Netflix and Amazon Prime Video access for those with a membership, YouTube access, advanced search and recommendations, and Xfinity apps for home and on the go. Xfinity X1 customers can also use the X1 Voice Remote for voice commands to change channels, search for shows, get recommendations, and more.

In addition, upon completion of this project, Comcast customers who subscribe to an Xfinity Internet package will have access to Xfinity WiFi hotspots, including those that would be newly added to the White Post Project area, for no additional cost. Moreover, these customers would be able to access any of Comcast's hotspots throughout Virginia and across the country. Comcast has the country's largest WiFi network, including more than 19 million hotspots nationwide and over 600,000 in Virginia. Even non-subscribers of Xfinity Internet can gain WiFi hotspot access using a WiFi On Demand pass.

Comcast Small and Medium Business customers will have access to gig speeds through the newly-launched 12/17/2018 9:31:38 AM Pages: 9 of 17

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"Business Internet 1 Gig" product. Comcast's "Business Internet 1 Gig" and "Business Internet 500" speed tiers are now available to business customers using the company's existing network.

[1] https://www.fcc.gov/reports-research/reports/measuring-broadband-america/measuring-fixed-broadband-report -2016#_Toc464398851

11. Project Readiness

What is the current state of project development (i.e. planning, preliminary engineering, final design, etc.)? Prepare a detailed project timeline or construction schedule, which identifies specific tasks, staff, contractor responsible(s), collection of data, etc., and estimated start and completion dates. The timeline should include all activities being completed within 12 months of contract execution with DHCD.

Answer:

The White Post project is in the preliminary engineering phase. Final design will commence upon the award of the grant by DHCD and will continue to completion on or before the construction deadline pursuant to a final grant agreement. Comcast is confident it can complete the proposed work on time and within budget. Workflow is included in the attached project management plan.

The specific initial tasks include project engineering and right of way preparation. These projects are designed to place all new facilities underground, thus avoiding time consuming and expensive negotiations with the local electric cooperative. While make-ready work and pole application agreements will be avoided, Comcast will need to obtain the necessary permits from the Virginia Department of Transportation ("VDOT") to place facilities underground in the VDOT right of way and will need support from the county in ensuring that necessary power supplies are coordinated and installed with the local electric company. Comcast will ask Clarke County officials to assist in obtaining these permits and power supplies expeditiously. This coordination will need to begin immediately upon notice of the grant award. Also upon receipt of the grant, Comcast will make contact with all "nonstandard drop" customers to determine if they will be interested in Comcast services and if they would allow Comcast to perform work on their private property. Material procurement and some pre-construction work will occur during this period and will enable Comcast to proceed with actual construction as soon as VDOT issues the right of way permits.

Activation of all HFC plant will be completed by both in-house Comcast employees and select contract personnel. The final quality control inspection of all new infrastructure will be completed by Comcast employees to ensure all new construction meets or exceeds FCC standards. As noted above, an additional notice of service availability will be provided not later than 20 days prior to the Completion Date.

12. Matching funds: Provide a description of the matching funds the applicant and co-applicant will invest in the proposed project, (VATI funding cannot exceed 80% of total project cost). The Funding Sources Table should be completed.

i. For each element of matching funds in the description, indicate the type of match (cash, salary expense, or inkind contribution).

ii. Identify whether the applicant or co-applicant is responsible for providing each element of the proposed matching funds.

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iii. Include copies of vendor quotes or documented cost estimates supporting the proposed budget.

Answer:

Comcast, the co-applicant, upon award of the VATI grant, will be responsible for any matching funds and will provide the labor and materials to complete the provision of services to the area delineated in the attached map. The total value of the labor and materials provided by Comcast is \$119,463. VATI requested funding of \$328,976 would represent approximately 64% of the total project cost.

A breakdown of costs is attached below.

Name	Locatio ns	Mileag e	HP/Mil e	Total Cost	Comcas t Cost	Requeste d Gap Funding	VATI Gap Fundin g
White Post	97	5.08	19.1	\$328,97 6	\$119,46 3	\$209,51 3	64%

13. Identify key individuals, including name and title, who will be responsible for the management of the project. Describe their role and responsibilities for the project. Present this information in table format.

Answer:

The project area for this application was selected in part because of a need for service and the absence of any contractual or legal requirements for Comcast, or any other provider, to extend service there.

Clarke County supervisors agreed to proceed with a VATI application in partnership with Comcast at their work session on November 8, 2018. The staff of Clarke County then coordinated this partnership arrangement with Comcast. Comcast and Clarke County will complete a formal agreement to make review of work and processing of payments as efficient as possible. Comcast anticipates submitting invoices at the mid-point of the project and at project completion.

The partners have agreed in principle on the following responsibilities:

 \cdot Clarke County intends to partner with Comcast as a co-applicant for a VATI grant to extend broadband service to unserved areas of Clarke County.

• Clarke County would complete the grant application (with Comcast's assistance); submit the completed application(s) to the Virginia DHCD; and manage the processing of work payments. Because Clarke County will

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be the funded applicant in the event of award, the county would timely process all VATI related Comcast invoices that applied directly to the approved work plans, design, and statement of work. Any delays in completing the work as planned would be negotiated with DHCD as partners.

• Clarke County also would provide services and support for any necessary citizen engagement activities, including but not limited to: processing applications for right of way in a manner consistent with all local, state, and federal law; advocating and describing the benefits of the project to those affected; and working with Comcast and other partner agencies (e.g. VDOT) and private industry (e.g. Rappahannock Electric Cooperative) to help coordinate construction and/or pole attachments.

 \cdot Comcast would provide accurate VATI construction plans; associated material and work invoices to match the construction plans; detailed descriptions of necessary right of way or pole attachments; and timely notice of other needs to Clarke County.

• This general agreement proceeds from the notice of VATI award to the completion of the projects.

14. Applicant and Co-Applicant: A description of the public-private partnership involved in the project. Detail the local government assistance: Local government co-applicants should demonstrate assistance to project that will lower overall cost and further assist in the timely completion of construction, including assistance with permits, rights of way, easement and other issues that may hinder or delay timely construction and increase cost.

i. If the partnership is formalized in a written agreement provide a copy of that agreement.

ii. If the partnership has not been formalized, provide a short description of the project management role, financial commitment, or other contribution to the project for the applicant and co-applicant and any additional partners.

Answer:

Name	Title	Responsibility
Nathan Daugherty	Manager, Comcast Gov. Affairs	Coordination with Clarke County
Brian Engle	Manager, Comcast Construction	Supervision of Construction
David Ash	County Administrator, Clarke County	Coordination with Comcast; conduct project administration including invoice processing with DHCD

15. Project Budget and Cost Appropriateness

Applicants shall provide a detailed budget as to how the grant funds will be utilized, including an itemization of

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equipment and construction costs and a justification of proposed expenses. Expenses should substantiated by clear cost estimates.

Answer:

Comcast's Construction and Design team managed projects that added thousands of HFC miles to Comcast's regional network between 2015 and 2018. This team estimates that the total cost to complete the VATI project depicted on the attached map is \$329,976 and will comprise approximately 5.08 miles of new construction in total. The cost anticipates internal and contract labor costs of \$230,283.20 and material and supply costs of \$98,692.80. Comcast agrees to provide \$119,463 of the total, with the remaining \$209,513 being requested from DHCD. Any cost overruns during construction will be borne by Comcast.

Comcast's construction estimates are determined through a detailed project analysis that includes a field survey, an analysis of permitting costs (internal or external), a network impact study to determine necessary hub site preparation and possible infrastructure requirements, and a financial evaluation for overall build costs and likely return-on-investment. When contract labor is utilized, costs are accrued according to the fee schedule in the contract. This design and construction process is standard within the telecommunications industry.

The precise amount to be spent on contract labor versus in-house resources will be determined when the grant is approved and the work commences. The allocation of work will depend on the level of construction activity at that time. Any contracted engineering and design work outlined in this proposal will be performed by Comcast's contractor Precision Valley Communications of Vermont LLC with offices located at 36 Precision Drive, Suite 200, North Springfield, VT 05150. Any contracted network construction will be performed by Comcast's contractor Fiber Technologies Solutions, LLC with offices located at 4901 Waller Road, Richmond, Virginia 23230. A copy of the contracts between Comcast and its contractors can be made available for confidential review upon award of this grant.

Comcast and DCHD would be the only two revenue sources for the White Post project. The amount sought through a VATI grant is the difference between the total cost of construction and the capital investment Comcast can make according to its financial models. The grant funds received would be used in conjunction with the contribution of labor and material from Comcast to complete the project.

16. The cost benefit index is comprised of three factors: (i) state share for the total project cost, (ii) state cost per unit passed, and (iii) the internet speed. From these statistics, individual cost benefit scores are calculated. Finally, the three component scores are averaged together and converted to a 30 point scale to form a composite score.

Answer:

- (i) State share of total project cost = 64%
- (ii) State cost per unit passed = \$2,159.93
- (iii) Internet speed = up to 2 Gbps down / 2 Gbps up
- 17. A description of applicant and co-applicant's history or experience with managing grants and constructing broadband communications facilities in the Commonwealth of Virginia and elsewhere.

Answer:

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Clarke County has significant experience managing both federal and state grants. According to the County's FY17 Comprehensive Annual Financial Report for fiscal year ending June 30, 2017, the County actively managed \$1,437,401 in federal grants and awards as well as \$5,448,587 in state awards.

These totals include grants in the general areas of government, schools, and sanitation. In addition, Clarke County's Joint Administrative Services Department was awarded, and successfully completed, a \$510,000 Community Development Block Grant with DHCD in FY2003. Related to the subject of technology, the County was previously awarded a Virginia Technology Bond grant for \$154,000.

Comcast is a leading communications provider in Virginia, offering video, high-speed Internet, home security, and phone services to residential customers under the Xfinity brand and also providing services to businesses through its Comcast Business suite of products. Comcast has invested in technology to build an advanced network that delivers among the fastest broadband speeds, and brings customers personalized video, communications, and home management offerings. Comcast has invested billions of dollars to create a network across the U.S. that makes broadband widely available, as part of its commitment to provide superior services to its customers.

Between 2011 and 2017, Comcast made more than \$1.6 billion in technology and infrastructure investments in Virginia to offer reliably fast speeds even during peak use periods. The company has invested significant resources in both local and national Network Operations Centers ("XOC") to ensure continued proactive monitoring of network health, increased its Internet speeds for customers 17 times in 17 years, and doubled the capacity of its broadband network every 18-24 months.

In Virginia, Comcast employs over 3,400 people. It invests more than \$213 million annually in payroll, benefits, and training for its Virginia workforce. The company maintains a large, locally based engineering technical operations team that works around the clock to maintain network reliability and to directly support the company's business and residential customers. For many decades, Comcast, through its Beltway Region, has served over 140 communities in Virginia. Many of these communities are very rural in nature.

Comcast has experience partnering with public agencies to deploy broadband infrastructure in unserved areas. Comcast was awarded two Virginia Telecommunications Initiative grants in early 2018. Both construction projects are now complete with Internet service offered to residences and businesses throughout the project footprints. In 2018 it also earned a Last Mile Broadband grant from the Virginia Tobacco Region Revitalization Commission to provide broadband access to nearly 7,000 homes and businesses.

In Massachusetts, Comcast was awarded a grant of \$4,000,000 from the Massachusetts Technology Collaborative ("Mass Tech") for construction of line extensions to areas in nine towns whose costs to construct exceeded Comcast's economic standards. Comcast completed the project on time, on budget, and reached 20% more homes than the 1,000 originally anticipated.

Comcast was also awarded a grant of \$805,800 by Mass Tech for construction of approximately 27 miles of line extensions in Montgomery, Massachusetts, a town which is currently unserved.

In 2013 and 2014, Comcast received two grants from the Vermont Telecommunication Authority ("VTA") totaling \$336,558 to provide service to areas that were economically unfeasible for construction. In 2015 and 2017, the Vermont Department of Public Service ("DPS") twice awarded Comcast funds from its Connectivity Initiative grant totaling \$359,850. Comcast has either fulfilled or is on schedule to fulfill its grant obligations to the VTA and DPS.

18. Service

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Describe the Internet service offerings to be provided after completion of this project and your price structure for these services. The service offerings should include all relevant tiers.

Answer:

Upon completion of the White Post area build, Comcast will offer its full suite of products and services to residents in the proposed service area, including broadband services, voice, video, and home security. With respect to broadband service, Comcast's 1 Gigabit Internet service will use DOCSIS 3.1 technology to deliver the speeds through its HFC network. To enjoy the service, all customers need to do is install a DOCSIS 3.1 cable modem. Pricing for all relevant residential Xfinity Internet tiers is listed below.

Residential Tier	Xfinity Internet Service Only	With Xfinity TV or Voice Service
Performance	\$74.95	\$61.95
Performance Pro	\$89.95	\$76.95
Blast!	\$92.95	\$79.95
Extreme Pro	\$99.95	\$86.95
Gig	\$104.95	\$91.95
Gigabit Pro	\$299.95	\$299.95

Comcast Business customers will have access to gig speeds through the newly-launched "Business Internet 1 Gig" product. Comcast's "Business Internet 1 Gig" and "Business Internet 500" speed tiers are now available to business customers using the company's existing network. Pricing for all relevant Comcast Business SMB Internet tiers is listed below.

Business Tier	Standalone Pricing
Starter	\$69.95
Business Internet 75	\$149.95
Business Internet 150	\$249.95
Business Internet 300	\$349.95
Business Internet 500	\$399.95
Business Internet 1G	\$499.95

Residents and businesses in the proposed service area will be offered broadband services of the same quality and current price as those offered in other Comcast service areas. Comcast will not offer a separate rate applicable to only those customers within the project area included in this proposal. The customer will

Clarke County, Virginia

Comcast Clarke County White Post Broadband Project

19. Additional Information

Any other equitable factor that the applicant desires to include.

Answer:

N/A

Attachments:

Derivation of Cost (Project Budget)

Attachment1DerivationofCostsWorksheetClarke20181214201893706.pdf

Project Management Plan

Attachment2ProjectManagementPlanClarke201812142018100642.pdf

Supporting documentation for costs estimates

 $\label{eq:linear} Attachment 3 Supporting Documentation Of Cost Estimates Clarke 20181214201820251.pdf$

Map(s) of project area, including proposed infrastructure Attachment4ProjectAreaMapClarke201812142018100657.pdf

Map(s) or schematic of existing broadband providers (inventory of existing assets) Attachment5SchematicOfExistingProvidersClarke201812142018100716.pdf

Documentation of relationship between applicant and co-applicant (formal or informal) Attachment6DocumentationOfRelationshipClarke20181214201820259.pdf

Two most recent Form 477 submitted to FCC

Attachment7Form477SubmittedByComcastClarke201812142018100743.pdf

Documentation for in-kind contributions, including value(s) Attachment8DocumentationOfInKindContributionsAndValueClarke201812142018100752.pdf

Clarke County, Virginia Comcast Clarke County White Post Broadband Project

Documentation supporting project costs (i.e. vendor quotes)

Attachment9DocumentationOfSupportingProjectCostsClarke201812142018100757.pdf

Documentation of source of match funding

Attachment10DocumentationOfSourceOfMatchFundingClarke201812142018100809.pdf

Documentation that proposed project area is unserved based on VATI criteria Attachment11DocumentationThatAreaIsUnservedClarke20181214201824016.pdf

Documentation that proposed project area is not designated for Connect America Funding (CAF) Attachment12DocumentationArealsNotEligibleForCAFClarke201812142018100929.pdf

Funding Sources Table

Attachment13FundingSourcesTableClarke201812142018103413.pdf

	Comcast / Clarke County Broadba	and Project Derivat	ion of Costs		
	Total	VATI	Non-VATI	Source of Estimate	Date
WHITE POST PROJECT					
Construction					
Broadband Construction - 5.08 miles	\$328,976	\$209,513	\$119,463	Comcast survey	12/14/2018

		Proposed Timeline - Comcast / Clarke County Broadband Project														
Task	Responsible Entity	February 2019	March	April	May	June	June	July	August	September	October	November	December	January 2020	February	March
VATI project awards announced	VA DHCD															
Finalize grant agreement(s)	Comcast, Clarke County, VA DHCD															
Project engineering	Comcast, Clarke County															
Obtain permits from VDOT for VDOT right of way	Clarke County, Comcast															
Materials procurement	Comcast															
Construction/installation of fiber	Comcast															
Turn-up, test and database work	Comcast															
Service availability notification to potential customers	Comcast															
Final field inspection	Comcast, Clarke County, VA DHCD															



Mr. David Ash County Administrator Clarke County 101 Chalmers Court, Suite B Berryville, VA 22611

Dear Mr. Ash:

The purpose of this letter is to provide information supporting documentation for cost estimates for the White Post project proposed to the Virginia Telecommunications Initiative ("VATI") program.

Comcast's Construction and Design team managed projects that added thousands of miles to Comcast's regional hybrid fiber coaxial network between 2015 and today. Comcast's construction estimates are determined through a detailed project analysis that includes a field survey, an analysis of permitting costs (internal or external), a network impact study to determine necessary hub site preparation and possible infrastructure requirements, and a financial evaluation for overall build costs and likely return-on-investment. When contract labor is utilized, costs are accrued according to the fee schedule in the contract. This design and construction process is standard within the telecommunications industry.

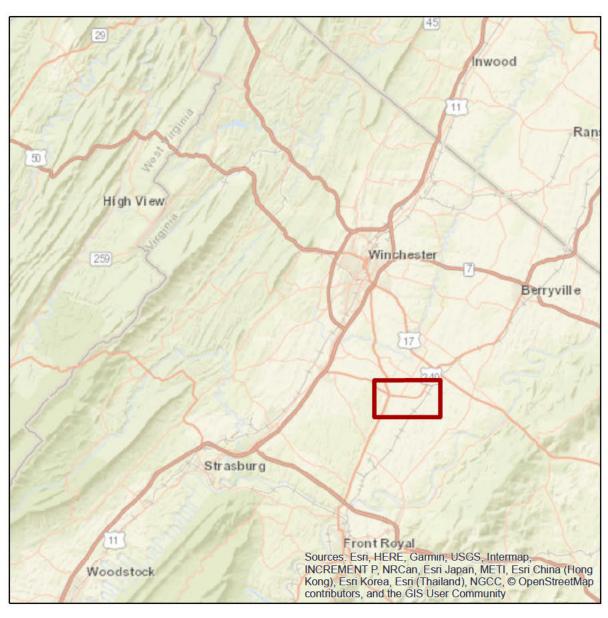
The precise amount to be spent on contract labor versus in house resources will be determined when the grant is approved and the work commences. The allocation of work will depend on the level of construction activity at that time. Any contracted engineering and design work outlined in this proposal will be performed by Comcast approved contractors.

Should you have any questions regarding the information listed above, please do not hesitate to contact Nathan Daugherty with Comcast Government Affairs.

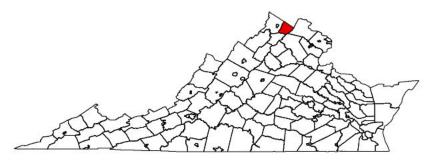
Sincerely,

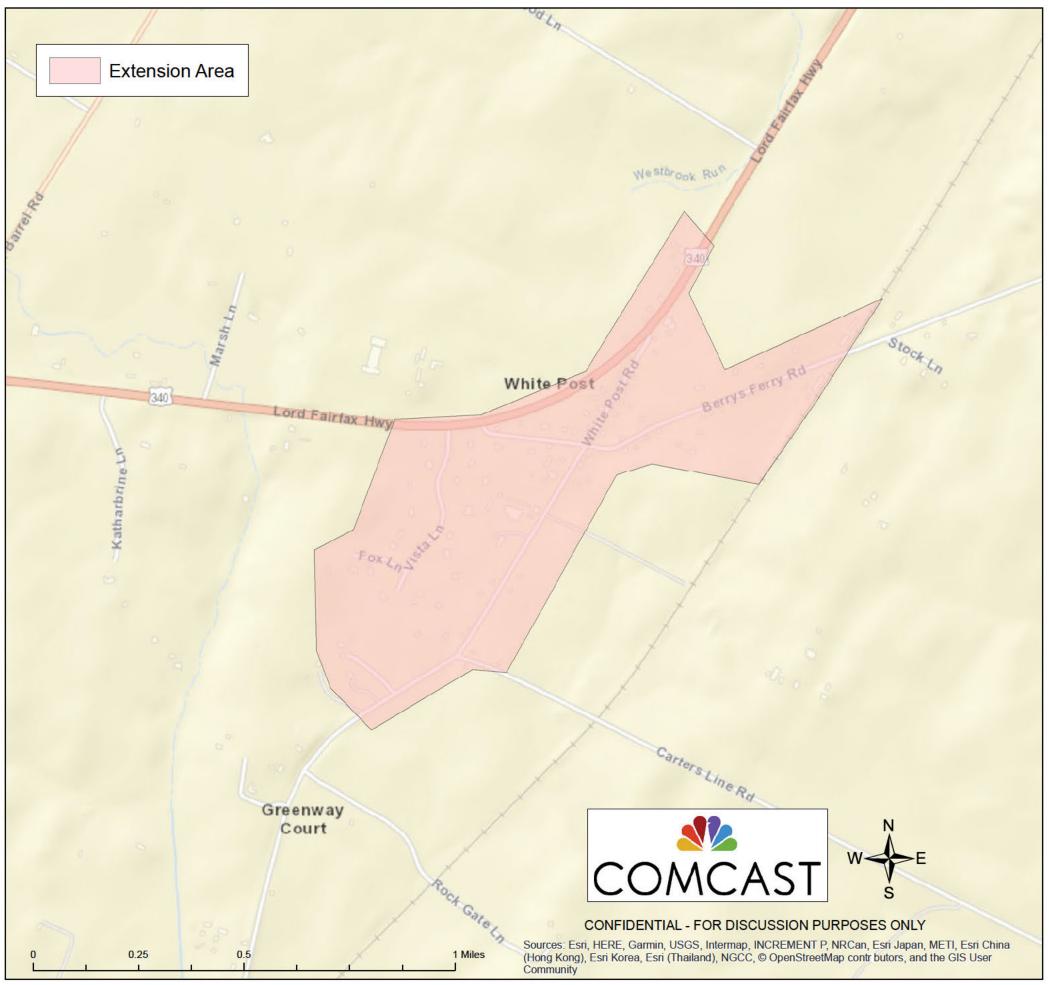
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Tom Yates Senior Director, Construction



CLARKE COUNTY SERVICE EXTENSION WHITE POST AREA





Comcast / Clarke County Broadband Project							
	vice Addresses						
Address	City	State	Zipcode				
14270 LORD FAIRFAX HWY	WHITE POST	VA	22663				
14290 LORD FAIRFAX HWY 14314 LORD FAIRFAX HWY	WHITE POST	VA VA	22663				
14314 LORD FAIRFAX HWY 14336 LORD FAIRFAX HWY	WHITE POST WHITE POST	VA VA	22663 22663				
14356 LORD FAIRFAX HWY	WHITE POST	VA VA	22663				
14401 LORD FAIRFAX HWY	WHITE POST	VA VA	22663				
14402 LORD FAIRFAX HWY	WHITE POST	VA	22663				
14419 LORD FAIRFAX HWY	WHITE POST	VA	22663				
14420 LORD FAIRFAX HWY	WHITE POST	VA	22663				
14478 LORD FAIRFAX HWY	WHITE POST	VA	22663				
14725 LORD FAIRFAX HWY	WHITE POST	VA	22663				
14767 LORD FAIRFAX HWY	WHITE POST	VA	22663				
106 BERRYS FERRY RD	WHITE POST	VA	22663				
127 BERRYS FERRY RD	WHITE POST	VA	22663				
136 BERRYS FERRY RD	WHITE POST	VA	22663				
161 BERRYS FERRY RD	WHITE POST	VA	22663				
179 BERRYS FERRY RD	WHITE POST	VA	22663				
221 BERRYS FERRY RD	WHITE POST	VA	22663				
272 BERRYS FERRY RD	WHITE POST	VA	22663				
275 BERRYS FERRY RD	WHITE POST	VA	22663				
300 BERRYS FERRY RD	WHITE POST	VA	22663				
320 BERRYS FERRY RD	WHITE POST	VA	22663				
325 BERRYS FERRY RD	WHITE POST	VA	22663				
344 BERRYS FERRY RD	WHITE POST	VA	22663				
40 BERRYS FERRY RD	WHITE POST	VA	22663				
404 BERRYS FERRY RD	WHITE POST	VA	22663				
408 BERRYS FERRY RD	WHITE POST	VA	22663				
428 BERRYS FERRY RD	WHITE POST	VA	22663				
432 BERRYS FERRY RD	WHITE POST	VA	22663				
433 BERRYS FERRY RD	WHITE POST	VA	22663				
450 BERRYS FERRY RD	WHITE POST	VA	22663				
492 BERRYS FERRY RD 586 BERRYS FERRY RD	WHITE POST WHITE POST	VA VA	22663 22663				
644 BERRYS FERRY RD	WHITE POST	VA VA	22003				
649 BERRYS FERRY RD	WHITE POST	VA VA	22663				
650 BERRYS FERRY RD	WHITE POST	VA VA	22663				
668 BERRYS FERRY RD	WHITE POST	VA	22663				
692 BERRYS FERRY RD	WHITE POST	VA	22663				
713 BERRYS FERRY RD	WHITE POST	VA	22663				
715 BERRYS FERRY RD	WHITE POST	VA	22663				
26 CARTERS LINE RD	WHITE POST	VA	22663				
33 CARTERS LINE RD		VA	22663				
83 CARTERS LINE RD	WHITE POST	VA	22663				
163 FOX LN	WHITE POST	VA	22663				

38 FOX LN	WHITE POST	VA	22663
55 FOX LN	WHITE POST	VA	22663
99 FOX LN	WHITE POST	VA	22663
97 STONE QUARTER LN	WHITE POST	VA	22663
109 STONE QUARTER LN	WHITE POST	VA	22663
119 STONE QUARTER LN	WHITE POST	VA	22663
104 VISTA LN	WHITE POST	VA	22663
145 VISTA LN	WHITE POST	VA	22663
165 VISTA LN	WHITE POST	VA	22663
186 VISTA LN	WHITE POST	VA	22663
201 VISTA LN	WHITE POST	VA	22663
209 VISTA LN	WHITE POST	VA	22663
238 VISTA LN	WHITE POST	VA	22663
281 VISTA LN	WHITE POST	VA	22663
283 VISTA LN	WHITE POST	VA	22663
311 VISTA LN	WHITE POST	VA	22663
314 VISTA LN	WHITE POST	VA	22663
37 VISTA LN	WHITE POST	VA	22663
40 VISTA LN	WHITE POST	VA	22663
47 VISTA LN	WHITE POST	VA	22663
75 VISTA LN	WHITE POST	VA	22663
76 VISTA LN	WHITE POST	VA	22663
111 WHITE POST RD	WHITE POST	VA	22663
125 WHITE POST RD	WHITE POST	VA	22663
140 WHITE POST RD	WHITE POST	VA	22663
145 WHITE POST RD	WHITE POST	VA	22663
158 WHITE POST RD	WHITE POST	VA	22663
169 WHITE POST RD	WHITE POST	VA	22663
17 WHITE POST RD	WHITE POST	VA	22663
172 WHITE POST RD	WHITE POST	VA	22663
192 WHITE POST RD	WHITE POST	VA	22663
213 WHITE POST RD	WHITE POST	VA	22663
214 WHITE POST RD	WHITE POST	VA	22663
257 WHITE POST RD	WHITE POST	VA	22663
267 WHITE POST RD	WHITE POST	VA	22663
279 WHITE POST RD	WHITE POST	VA	22663
290 WHITE POST RD	WHITE POST	VA	22663
315 WHITE POST RD	WHITE POST	VA	22663
326 WHITE POST RD	WHITE POST	VA	22663
37 WHITE POST RD	WHITE POST	VA	22663
398 WHITE POST RD	WHITE POST	VA	22663
400 WHITE POST RD	WHITE POST	VA	22663
515 WHITE POST RD	WHITE POST	VA	22663
548 WHITE POST RD	WHITE POST	VA	22663
549 WHITE POST RD	WHITE POST	VA	22663
576 WHITE POST RD	WHITE POST	VA	22663
626 WHITE POST RD	WHITE POST	VA	22663

648 WHITE POST RD	WHITE POST	VA	22663
662 WHITE POST RD	WHITE POST	VA	22663
690 WHITE POST RD	WHITE POST	VA	22663
91 WHITE POST RD	WHITE POST	VA	22663
98 WHITE POST RD	WHITE POST	VA	22663

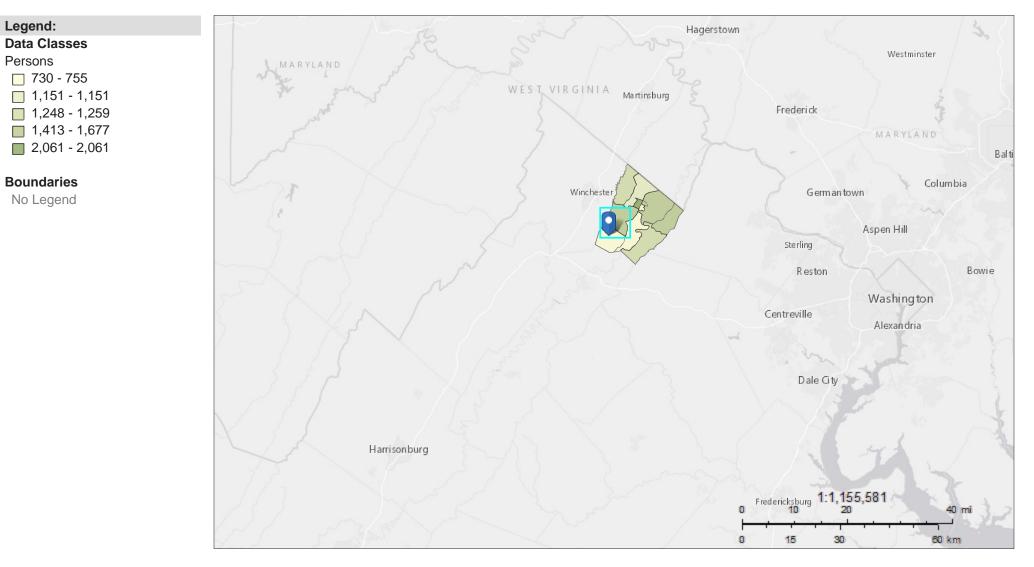


P1

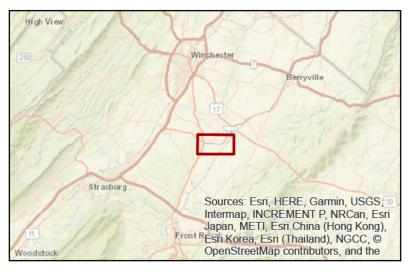
TOTAL POPULATION Universe: Total population 2010 Census Summary File 1

White Post, VA Area Population by Census Block

Thematic Map of Total Geography by: Block Group within Census Tract



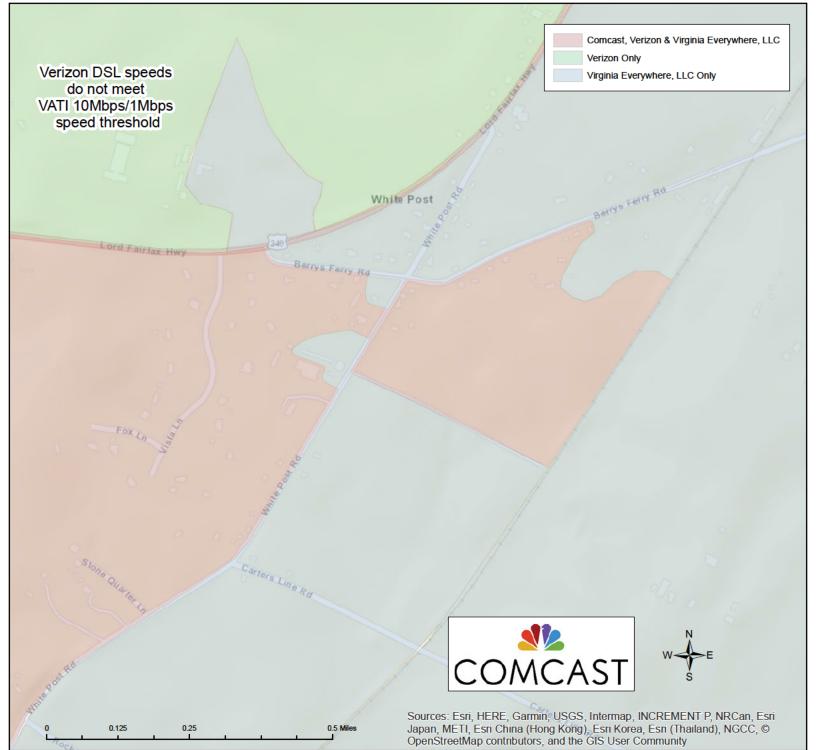
NOTE: For information on confidentiality protection, nonsampling error, and definitions, see http://www.census.gov/prod/cen2010/doc/sf1.pdf. Source: U.S. Census Bureau, 2010 Census.

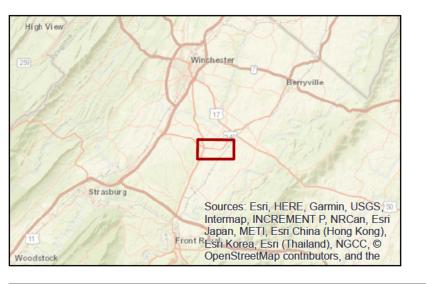


BROADBAND AVAILABILITY AS REPORTED BY THE FCC

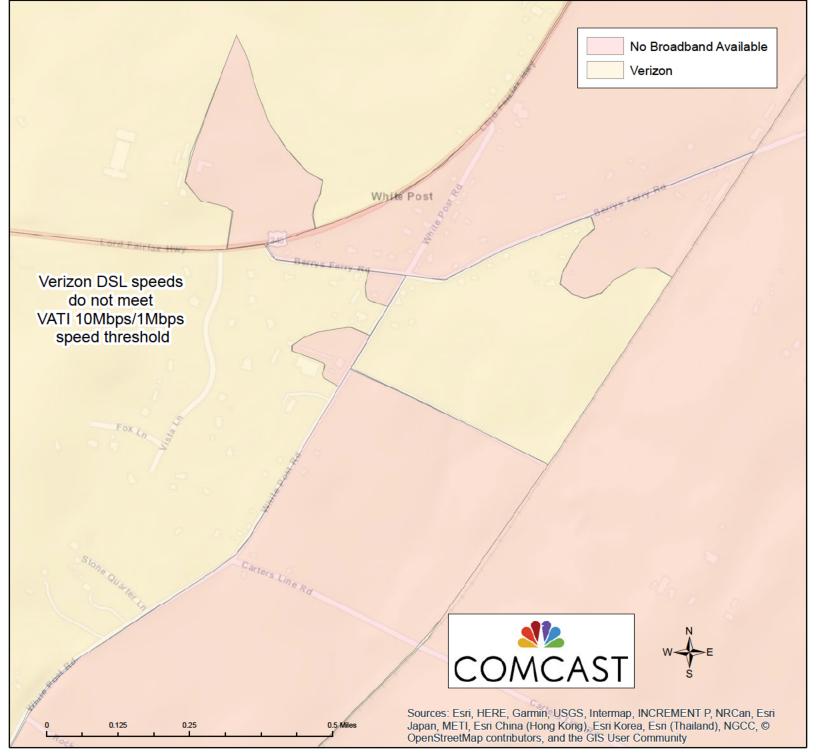
Form 477 Broadband Deployment Data June 2017 (Version 2)

Version 2 includes revisions made to this round between August 21, 2018 and November 13, 2018





ACTUAL BROADBAND AVAILABILITY



Documentation of relationship between applicant and co-applicant (formal or informal).

Clarke County supervisors agreed to proceed with a VATI application in partnership with Comcast at their work session on November 8, 2018. The staff of Clarke County then coordinated this partnership arrangement with Comcast. Comcast and Clarke County will complete a formal agreement to make review of work and processing of payments as efficient as possible. Comcast anticipates submitting invoices at the mid-point of the project and at project completion.

The partners have agreed in principle on the following responsibilities:

· Clarke County intends to partner with Comcast as a co-applicant for a VATI grant to extend broadband service to unserved areas of Clarke County.

• Clarke County would complete the grant application (with Comcast's assistance); submit the completed application(s) to the Virginia DHCD; and manage the processing of work payments. Because Clarke County will be the funded applicant in the event of award, the county would timely process all VATI related Comcast invoices that applied directly to the approved work plans, design, and statement of work. Any delays in completing the work as planned would be negotiated with DHCD as partners.

• Clarke County also would provide services and support for any necessary citizen engagement activities, including but not limited to: processing applications for right of way in a manner consistent with all local, state, and federal law; advocating and describing the benefits of the project to those affected; and working with Comcast and other partner agencies (e.g. VDOT) and private industry (e.g. Rappahannock Electric Cooperative) to help coordinate construction and/or pole attachments.

• Comcast would provide accurate VATI construction plans; associated material and work invoices to match the construction plans; detailed descriptions of necessary right of way or pole attachments; and timely notice of other needs to Clarke County.

• This general agreement proceeds from the notice of VATI award to the completion of the projects.



Mr. David Ash County Administrator Clarke County 101 Chalmers Court, Suite B Berryville, VA 22611

Dear Mr. Ash:

The purpose of this letter is to provide information regarding the two most recent Form 477 submissions by Comcast to the Federal Communications Commission. Data from these submissions can be located at <u>https://www.fcc.gov/general/broadband-deployment-data-fcc-form-477</u>. Summaries of each are attached to this letter.

Should you have any questions regarding the information listed above, please do not hesitate to contact me.

Sincerely,

NA

Nathan Daugherty



Mr. David Ash County Administrator Clarke County 101 Chalmers Court, Suite B Berryville, VA 22611

Dear Mr. Ash:

The purpose of this letter is to provide documentation regarding the in-kind contributions for the projects proposed to the Virginia Telecommunications Initiative ("VATI") program.

The proposed project represents a partnership between Comcast and Clarke County. As indicated in the application, Comcast will provide approximately 36% of the projected construction costs of \$328,976 (\$119,463). Clarke County will assist in providing in-kind contributions including application analysis and preparation, coordination with the Department of Housing and Community Development, assistance with right of way permitting, and participating in further concert with Comcast as the project is approved and construction begins. The value of these services will depend on the level of activity occurring as the project commences.

Should you have any questions regarding the information listed above, please do not hesitate to contact me.

Sincerely,

NA

Nathan Daugherty Manager, Government Affairs & Regulatory Affairs



Mr. David Ash County Administrator Clarke County 101 Chalmers Court, Suite B Berryville, VA 22611

Dear Mr. Ash:

The purpose of this letter is to provide information supporting the construction costs for the White Post project proposed to the Virginia Telecommunications Initiative ("VATI") program.

The White Post project consists of extending Comcast infrastructure from existing facilities to Lord Fairfax Highway east of State Route 522 and south of Route 50, plus Vista Lane, Stone Quarter Lane, Fox Lane, portions of Berrys Ferry Road, portions of Carter's Line Road, and portions of White Post Road.

The total build is estimated to be 5.08 miles of infrastructure and laterals. Estimated budget costs for construction are:

Materials:	\$78,954
Labor:	\$250,022
Total cost:	\$328,976

Examples of items that are included in the Materials category are power supplies, fiber, conduit, splice enclosures, pedestals, and taps. Examples of items in the Labor category are in-house and contract labor to trench and backfill, lay conduct and fiber, perform administration of VDOT permits, and provide crew supervision. The itemized breakdown of construction costs is confidential and proprietary information, and cannot be disclosed.

Should you have any questions regarding the information listed above, please do not hesitate to contact Nathan Daugherty with Comcast Government Affairs.

Sincerely,

T=RUft

Tom Yates Senior Director, Construction



Mr. David Ash County Administrator Clarke County 101 Chalmers Court, Suite B Berryville, VA 22611

Dear Mr. Ash:

The purpose of this letter is to provide information regarding the source of match funding for the projects proposed to the Virginia Telecommunications Initiative ("VATI") program.

The capital costs of this broadband construction project in Clarke County are coming from two sources. Comcast will provide \$119,463 in materials and labor for the construction of the network, and will assume all ongoing maintenance and upgrade expenses. The Department of Housing and Community Development, through the funds allocated by the General Assembly to the VATI program, will provide a grant of up to \$209,513.

Should you have any questions regarding the information listed above, please do not hesitate to contact me.

Sincerely,

NA

Nathan Daugherty Manager, Government Affairs & Regulatory Affairs

		DOCUMENT		IS UNSERVED.	Survey Re	sponses tro	m Residents within W	/hite Post Project Area	
Respondent ID	Date Survey Completed	Address	City/Town	State	ZIP/Po stal Code	County	What is the name of your internet service provider?	What type of connection do you have (DSL, satellite, cellular, cellular hotspot, wireless ISP, wired ISP, etc.)?	What other internet service providers are available to serve your residence?
			-						
10369252743	2018-11-21 20:57:44	450 BERRYS FERRY RD	White Post VA	VA	22663	Clarke	AT&T Wireless	cellular hotspot	cellular or cellular hotspot as satellite services are blocked by treelines.
		275 BERRYS FERRY							
10359538883	2018-11-16 18:57:15	RD	WHITE POST	VA	22663	CLARKE	VERIZON WIRELESS	CELLULAR HOTSPOT	NONE
10359302175	2018-11-16 16:36:39	290 white post rs	White Post	Va	22663	Clarke	Att	Cellular , cell hotspot	?
10358922088	2018-11-16 13:47:23		White Post	VA	22663	Clarke	ViaSat	Satellite	Cellular hotspot
		272 Berrys Ferry							
10345025182	2018-11-12 17:04:20	rd	White post	Va	22663	Clarke	AT&T	Cellular hotspot	Nothing viable for me
10343966550	2018-11-12 12:01:38		White Post	Virginia	22663	Clarke	Verizon Wireless	Cellular, using a mifi	None I work from home in a home based business and need reliable upload and download speed for large files. My current provider, Verizon Wireless, is very inadequate because of bandwidth reliability and amount of data used. I have 24gb of data to use per month and often run out at the end of the month. Internet use is almost purely business. I'm not watching Netflix, etc.
		257 White Post							
10343834927	2018-11-12 11:22:43	Road	White Post	VA	22663	Clarke	Verizon Wireless	Cellular Hotspot	Satellite, cellular, no WISPs, no others

DOCUMENTATION THAT AREA IS UNSERVED: Survey Responses from Residents within White Post Project Area

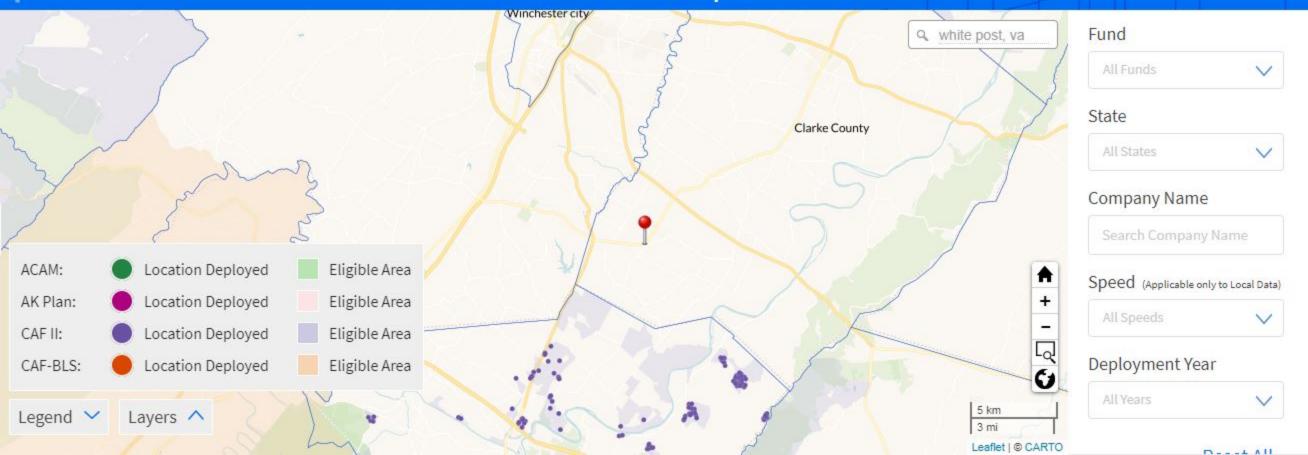
Documentation that proposed project area is not designated for Connect America Funding (CAF).

Comcast and Clarke County accessed the Universal Service Administrative Company's ("USAC") Connect America Fund ("CAF") Broadband Map to determine the area proposed for the Comcast / Clarke County Broadband Project is not designated for CAF. The map is accessible at the following web address: <u>https://data.usac.org/publicreports/caf-map/</u>.

As detailed in the attached map images, the White Post area of Clarke County does not fall within an area eligible for either CAF-BLS or CAF II.

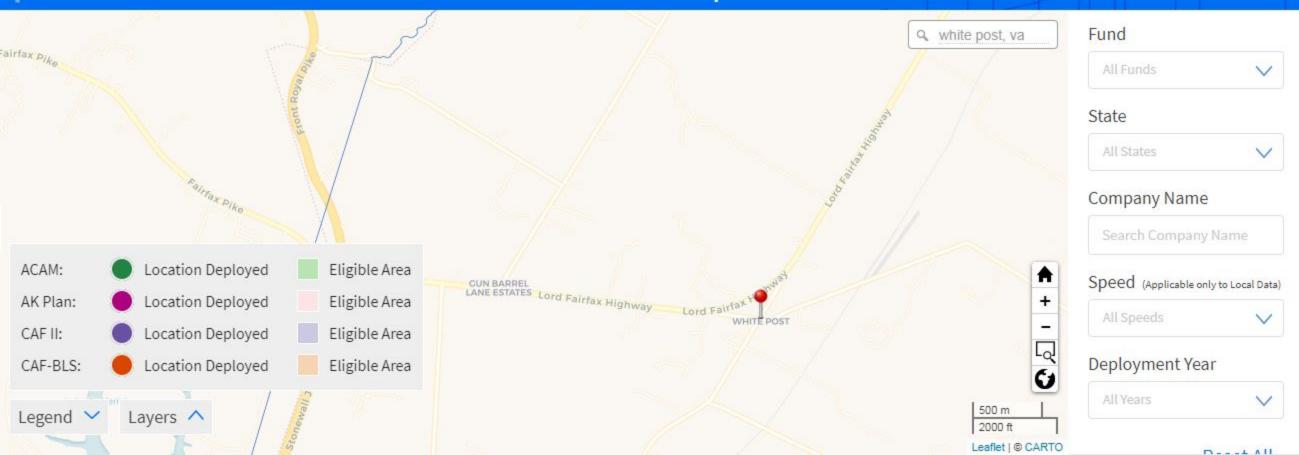
Connect America Fund Broadband Map

Universal Service Administrative Co.



Connect America Fund Broadband Map

Universal Service Administrative Co.



Comcast / Clarke County Broadband Project - Development Funding Sources							
Source (e.g., HUD)	Amount	Status	Documentation Included				
Comcast	\$119,463	Committed pending	Yes No				
DHCD	\$209,513	🗌 committed 🔀 pending	🗌 Yes 🔀 No				
		committed pending	Yes No				
		committed pending	Yes No				
		committed pending	Yes No				
Operating Funding Sources							
Source (e.g., HUD)	Amount	Status	Documentation Included				
n/a		committed pending	Yes No				
		committed pending	Yes No				
		committed pending	Yes No				
		committed pending	Yes No				
		committed pending	Yes No				