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VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: AU Docket No. 20-34, WC Docket No. 19-126, WC Docket No. 10-90: *Comment Sought on Preliminary List of Eligible Areas for the Rural Digital Opportunity Fund Phase I Auction*

Dear Ms. Dortch:

In accordance with the Wireline Competition Bureau's *Public Notice*,¹ Frontier submits information about census blocks it believes are served with broadband speeds of at least 25/3 Mbps, and thus not eligible for the Rural Digital Opportunity Fund (*RDOF*) Phase I Auction. Consistent with the PN, Frontier provides, as Appendix 1 hereto, a list of census blocks to which it has deployed broadband at speeds of 25/3 Mbps or greater since Frontier's June 2019 Form 477 filing and that appear on the Bureau's preliminary list. This data is current as of March 2020. These blocks should be removed.

Attached as Appendix 2 hereto is a list of census blocks that Frontier believes are served, or will be served, at speeds of 25/3 Mbps or greater through state-funded programs. Frontier compiled Appendix 2 by reviewing each state's list of funded census blocks and overlaying it with the blocks identified by the FCC as eligible for RDOF.² For programs where addresses were provided, Frontier ran the addresses through Pitney Bowes Geocoding software to identify the census blocks. Information about each of the state programs can be found as follows:

- Arizona: <https://www.azcommerce.com/broadband/grant-opportunities/>³

¹ See *Wireline Competition Bureau Releases Comment Sought on Preliminary List of Eligible Areas for the Rural Digital Opportunity Fund Phase I Auction*, Public Notice, DA 20-275 (Mar. 17, 2020).

² See www.fcc.gov/auction/904.

³ The Arizona state program at issue is a grant to Mohave Electric Coop to cover its service area, i.e. "its 35,000 members" with Gig capable service. See also Mohave Electric Coop 2019 Annual Report at p. 4 (stating Mohave has "33,737 members"), available at <https://www.mohaveelectric.com/sites/mohaveelectric/files/documents/2019AnnualReport.pdf>. As

- Indiana: <https://www.in.gov/ocra/3004.htm>⁴
- Iowa: <https://ocio.iowa.gov/notice-funding-availability-002#APPLICATIONS>⁵
- Minnesota: https://mn.gov/deed/assets/2019-b2b-applications_tcm1045-403094.docx⁶
- New York: <https://nysbroadband.ny.gov/new-ny-broadband-program/phase-3-awards>⁷
- North Carolina: <https://www.nconemap.gov/datasets/great-projects-2019?geometry=-89.288%2C33.769%2C-70.831%2C36.905>⁸

Wisconsin also has a state broadband grant program, information about which can be found here: <https://psc.wi.gov/Pages/Programs/BroadbandGrants.aspx>. Frontier requested a list of the funded census blocks from the Public Service Commission of Wisconsin. The Commission responded that it did not have a list of census blocks funded by the broadband grants it had approved. Attached as Appendix 3 is a publicly available list of Wisconsin broadband grant awards, a map showing awarded areas, and approved applications. These awards are for speeds of 25/3 Mbps or greater. Frontier asks that the FCC request that the Public Service Commission of Wisconsin compile a list of the census blocks funded through the broadband grant program.

the grant covers the entire service area, Frontier overlaid Mohave’s electronic service-area map, available on page 20 of its annual report with the RDOF eligible areas map, available at <https://www.fcc.gov/reports-research/maps/auction-904-preliminary-eligible-areas/> to identify ineligible census blocks given there is no publicly available list of covered census blocks for this state program.

⁴ Indiana’s program provides funding for service of up to a gigabit per second. A list of the funded census blocks can be downloaded on the page linked above.

⁵ This page displays the applications and awarded support. The census blocks funded for each project are listed in each application and all funding is for 25/3 Mbps or greater.

⁶ As detailed in the summary of each grant, funding is provided for speeds at or above 25/3 Mbps. <https://mn.gov/deed/programs-services/broadband/grant-program/>.

⁷ The list of funded census blocks is available at the bottom of this landing page.

⁸ The funded census blocks are listed in the “data” tab of the mapping platform. The North Carolina Department of Information Technology confirmed to Frontier that all grant awards for this program were for speeds of 25/3 Mbps and higher. Information about the North Carolina GREAT Grant Program is available at <https://www.ncbroadband.gov/greatgrant/>.

Please contact the undersigned if you have any questions about these comments.

Respectfully submitted,

/s/ Diana Eisner

Diana Eisner

Attachments

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