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**VIA ECFS**

September 11, 2019

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Attention: Wireline Competition Bureau

**Re: Supplement to Consolidated Communications Networks, Inc.  
Petition for Waiver of Rural Broadband Experiment Requirement  
WC Docket No. 10-90, 14-58, 07-13; CC Docket No. 01-92**

Dear Ms. Dortch:

On behalf of Consolidated Communications Networks, Inc. ("CCNI"), JSI hereby supplements CCNI's Petition for Waiver the requirement that CCNI must certify that it completed the full one hundred percent of its Rural Broadband Experiment funded locations in order to be alleviated from keeping its Irrevocable Letter of Credit open.<sup>1</sup> The attached documents were requested by the Wireline Competition Bureau to provide more information about how CCNI determined that it had fewer location in the funded census blocks than what the Connect America Cost Model had calculated.

Inquiries may be directed to the undersigned consultant for CCNI.

Sincerely,

John Kuykendall  
Vice President  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

Attachment

Cc: Alex Minard, Nissa Laughner

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<sup>1</sup> Consolidated Communications Networks, Inc. Petition for Waiver, WC Docket No. 10-90, 14-58, 07-135; CC Docket No. 01-92, (filed April 11, 2019).

## **DECLARATION OF KEN WEISENBERGER CONSOLIDATED COMMUNICATIONS NETWORKS, INC.**

I, Ken Weisenberger, am the Chief Financial Officer of Consolidated Communications Networks, Inc. ("CCNI" or the "Company"), and hereby declare the statements herein to be true and accurate to the best of my knowledge in my role at CCNI. I have been employed by CCNI for 22 years. I have overseen CCNI's Rural Broadband Experiment ("RBE") project from the application until present time, and I have certified all CCNI's FCC Form 481 and HUBB filings. I have directly overseen CCNI's broadband deployment in its RBE-funded census blocks. Additionally, I have been a member of the community of Dickinson, North Dakota for 38 years, and have direct knowledge of CCNI's RBE-funded census blocks. I attest that the following statements accurately describe the steps that were taken to determine the actual number of locations in the funded census blocks for which RBE support was awarded to CCNI which then led to the conclusion that CCNI's RBE broadband deployment obligation of 171 locations is nine more locations than how many locations actually exist in the funded blocks. I attest that 162 locations meeting the FCC's definition of a "location" for RBE buildout purposes were found in the funded blocks, and that CCNI has extensively searched for additional locations in those blocks to meet its buildout obligation of 171 locations but was unable to identify any additional locations.


I, or other CCNI staff under my direct supervision, conducted the following field research, mapping, and other evaluations to come to the conclusion that there are 162 locations in the RBE-funded census blocks.

1. CCNI's engineer, KLJ Engineering, gathered geocode information about each location passed during the construction process and ensured that records and maps were maintained, and no location information was missed during the process.

2. CCNI hired its engineers, KLJ who hired a firm, to take aerial photos, which CCNI's mapping systems developer, Landon Filkowski, overlaid on CCNI's internal mapping system.
3. CCNI reviewed the photos to help identify locations in the funded census blocks that it may have missed during the construction process.
4. CCNI accessed the Stark County Assessors website to get additional information about locations in the funded census blocks. This resource was used to help identify addresses, and to cross-check them with CCNI's own database to further make sure that it did not miss any locations either during construction or in reviewing the aerial photos.
5. CCNI employees physically drove approximately 180 miles of rural roads to determine if certain location sites were habitable or not, and if they could be counted towards CCNI's buildout obligation.
6. CCNI's mapping systems developer looked specifically at the census blocks where the company was short locations compared to the RBE-funded locations for those blocks, and he identified 16 locations where there was some type of building (not an occupied home or business) or what appeared to be an abandoned property or farm.
7. CCNI gathered aerial photos of these properties and have attached samples as part of this petition.

The result of this extensive research concluded that there are 162 residential or business locations in the 103 census blocks in which CCNI receives RBE funding.

Ken Weisenberger, Chief Financial Officer

 8/2/2019

Consolidated Communications Networks, Inc.

Consolidated Communications Networks, Inc.  
Rural Broadband Experiment Funded Census Blocks

Rural Broadband Experiment Funded Census Block	Number of Funded Locations	Number of Locations Reported in HUBB	Difference Between Funded and Actual	Number of Observed Abandoned Locations	Photo of Abandoned Location	Exhibit #
380899633002205	1	1	0			
380899633002213	7	3	(4)	3	yes - 3 photos	5,6,7
380899633002222	3	1	(2)	2	Yes - 2 photos	8,9
380899633002225	3	3	0			
380899633002228	1	1	0			
380899633002415	2	2	0			
380899633002431	1	0	(1)	1	Yes - 1 photo	1
380899633002437	2	1	(1)	1	Yes - 1 photo	10
380899633002440	3	3	0			
380899633002442	2	1	(1)			
380899633002444	3	3	0			
380899633002448	2	1	(1)	1	Yes - 1 photo	11
380899633002450	1	1	0			
380899633002453	1	1	0			
380899633002455	1	1	0			
380899633002623	2	1	(1)		Yes - 1 photo	2
380899633002625	1	0	(1)		Yes - 1 photo	2
380899639001005	2	2	0			
380899639001017	4	4	0			
380899639001027	1	1	0			
380899639001039	1	1	0			
380899639001051	1	0	(1)			
380899639001096	1	1	0			
380899639001100	1	2	1			
380899639001105	1	1	0			
380899639001108	1	1	0			
380899639001109	1	0	(1)		Yes - 1 photo	3
380899639001110	1	1	0			
380899639001149	1	1	0			
380899639001182	5	3	(2)		Yes - 1 photo	12
380899639001192	2	2	0			
380899639001193	1	1	0			
380899639001196	1	1	0			
380899639001211	1	1	0			
380899639001221	2	3	1			
380899639001226	1	0	(1)			
380899639001242	1	0	(1)		Yes - 1 photo	4
380899639001244	1	0	(1)			
380899639001247	1	1	0			
380899639001248	1	2	1			
380899639001251	2	2	0			
380899639001279	1	1	0			
380899639001284	1	0	(1)			
380899639001296	2	1	(1)		Yes - 1 photo	13
380899639001301	1	1	0			
380899639001310	2	2	0			
380899639001318	2	2	0			
380899639001322	2	2	0			
380899639001330	3	3	0			



Consolidated Communications Networks, Inc.  
Rural Broadband Experiment Funded Census Blocks

380899639001342	1	1	0			
380899639001359	1	0	(1)			
380899639001360	2	2	0			
380899639001366	1	1	0			
380899639001379	1	1	0			
380899639001390	3	3	0			
380899639001398	1	1	0			
380899639001409	4	6	2			
380899639001431	4	4	0			
380899639001440	1	2	1			
380899639002004	3	3	0			
380899639002019	1	1	0			
380899639002021	2	1	(1)			
380899639002023	1	6	5			
380899639002033	4	3	(1)		Yes - 1 photo	14
380899639002036	1	0	(1)			
380899639002048	1	1	0			
380899639002078	1	1	0			
380899639002082	1	0	(1)			
380899639002090	2	4	2			
380899639002121	1	2	1			
380899639002139	1	0	(1)			
380899639002231	3	2	(1)			
380899639003008	1	1	0			
380899639003015	2	0	(2)			
380899639003018	2	2	0			
380899639003020	1	1	0			
380899639003043	1	1	0			
380899639003045	1	1	0			
380899639003061	2	1	(1)			
380899639003082	1	1	0			
380899639003105	2	3	1			
380899639003119	1	1	0			
380899639003173	1	1	0			
380899639003177	2	2	0			
380899639003190	1	1	0			
380899639003255	1	4	3			
380899639003276	1	2	1			
380899639003285	1	2	1			
380899639003298	1	1	0			
380899639003304	1	2	1			
380899639003356	2	2	0			
380899639003361	3	3	0			
380899639003392	1	1	0			
380899639003457	1	1	0			
380899639003487	1	1	0			
380899639003500	1	0	(1)			
380899640002000	2	1	(1)			
380899640002018	1	2	1			
380899640002026	3	3	0			
380899640002034	3	2	(1)		Yes - 1 photo	15
380899640002054	1	1	0			
380899640002061	2	3	1			
380899640002085	1	3	2			
<b>Totals</b>	<b>171</b>	<b>162</b>	<b>(9)</b>			

EXHIBIT 1

380899633002437

380899633002431

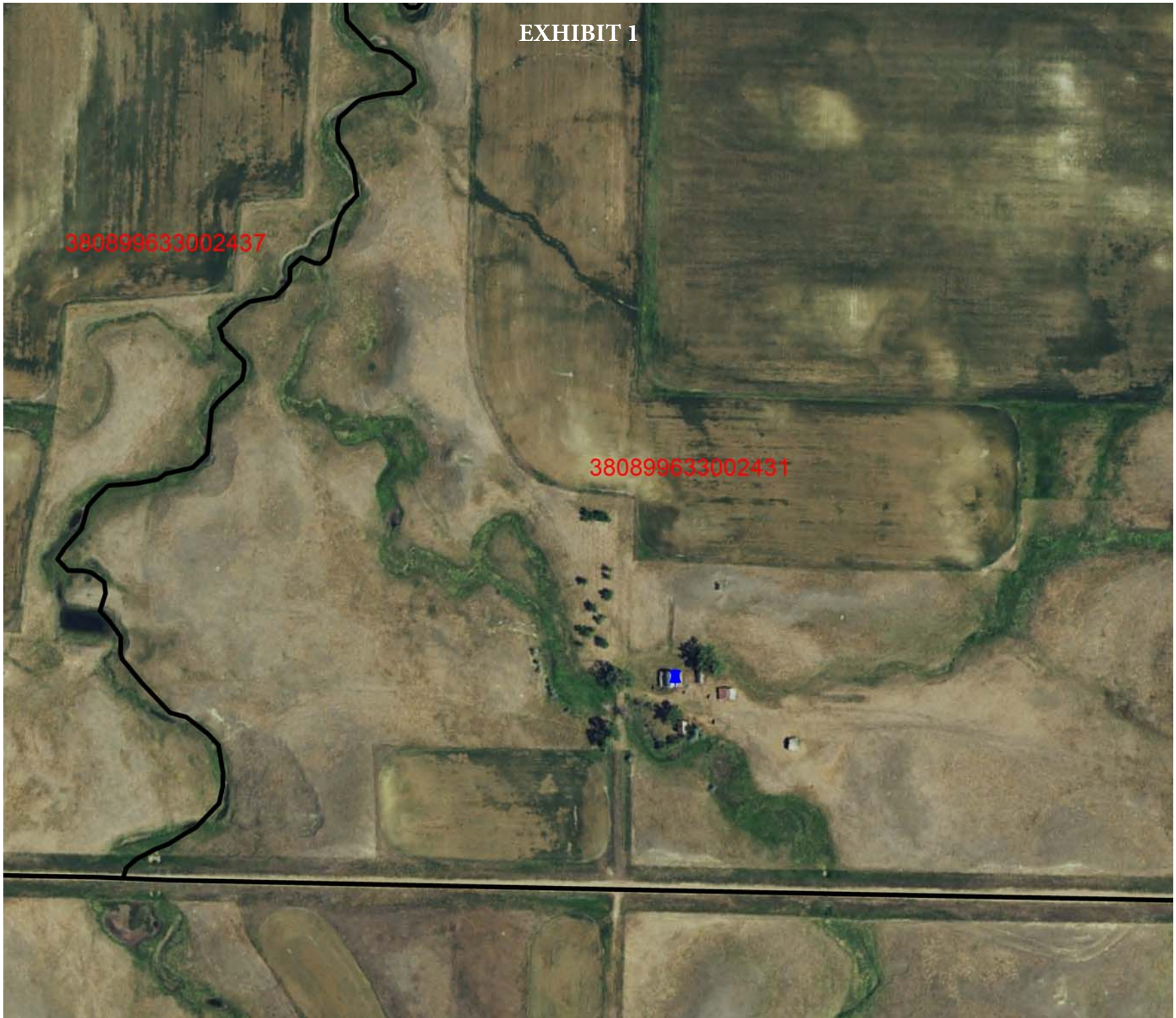




EXHIBIT 2

380899633002625

380899633002222

380899633002623





EXHIBIT 3

380899639001005

380899639001109

380899639001108





EXHIBIT 4

380899639001242



380899639001318



EXHIBIT 5

380899633002213

380899633002222





380899633002213





EXHIBIT 7

GS/16

GS/17

380899633002213



EXHIBIT 8

380899633002213

380899633002222





EXHIBIT 9

380899633002222

380899633002440

380899633002448



EXHIBIT 10

380899633002450

380899633002437





EXHIBIT 11

380899633002448



380899633002450



EXHIBIT 12

380899639001182





380899639001296

380899633002222





380899639002033

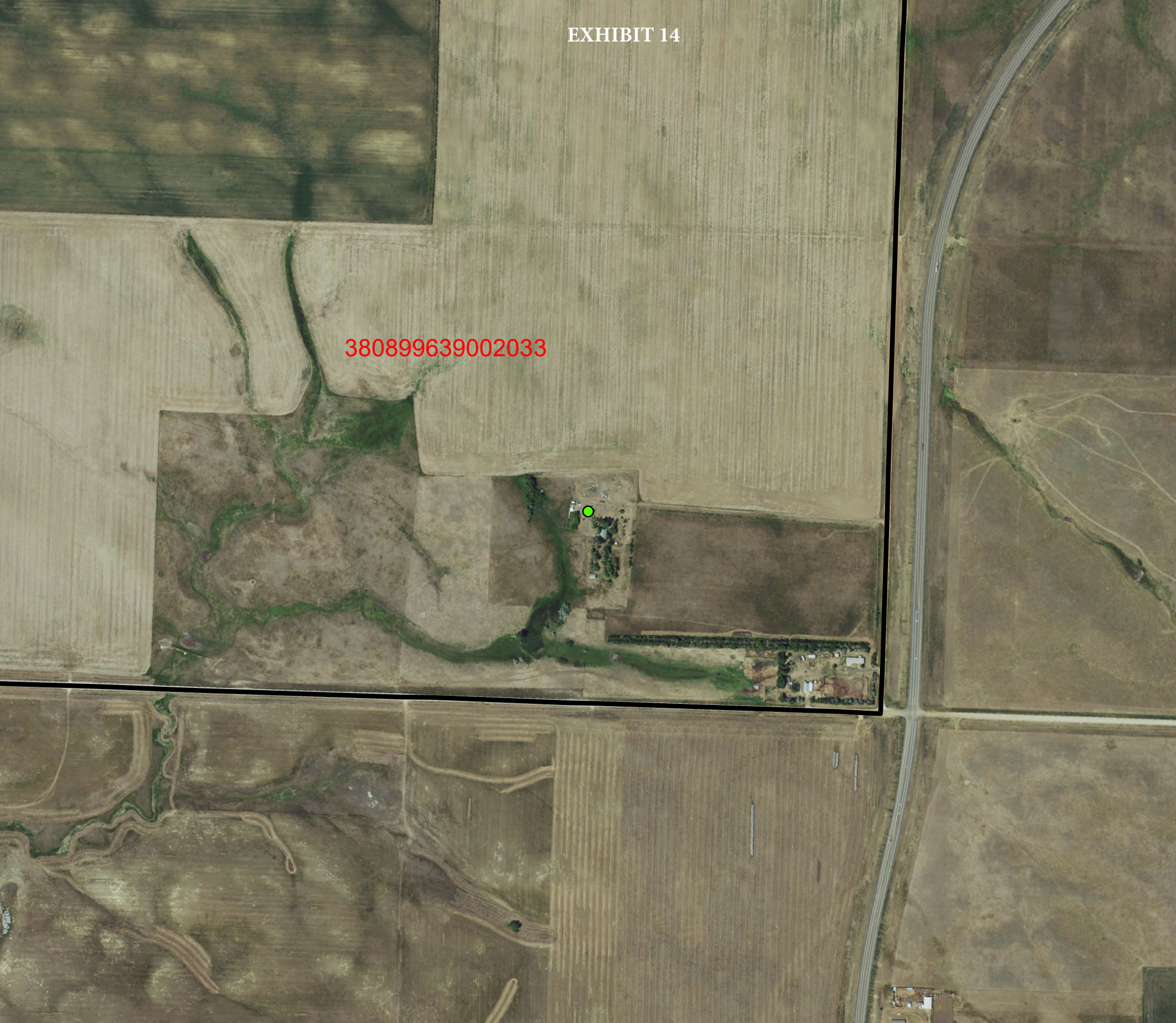




EXHIBIT 15

380899640002034

380899640002054